

## Service For All - Compliance

The table below outlines our compliance with Ofwat's 'Service for All' vulnerability guidance.

Last updated: June 2025



No.	Minimum expectation	Our compliance against the minimum expectations	Our current services and our future plans	How we plan to track our progress	Any challenges we see in meeting this expectations	Our targets and measures of success
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	Our Priority Services Register is designed for customers who have health, access or extra communication needs and helps us tailor our services to support households who may need extra help, so we are reassuringly there, whatever the need.  Our systems allow colleagues 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 teams are able to identify the customers need and tailor the service accordingly in every interaction.  Our initiatives to date:  Support during an incident – We hand deliver bottled water to our highest priority customers on the register and our teams carry bottle openers for those customers with mobility and dexterity challenges.  Ways to get in touch – We offer a range of ways for customers to get in touch. These include face to face visits from one of our Here For You Officers and the option for customers to visit us at our Head Office in Redhill, Surrey, which is fully accessible. Last year, we also introduced SignVideo as a contact channel.  Alternative formats – We currently offer our customers bills in alternative formats, such as braille, large print, electronic PDF and audio CD.  Foreign language support – We provide this service through our team of internal volunteers and our website has an inbuilt accessibility tool, ReciteMe, which translates the information into more than 100 languages.  Homes visits – We offer a number of options for accessing people's homes, including a 'knock and wait' service, and a 'password scheme' to give customers the confidence we are who we say we are. Our field teams are also equipped with Braille passes to provide an inclusive service for our customers with visual impairments.  Help checking water consumption – We offer a meter reading service, for customers who may want more frequent meter readings throughout the year. This also includes the option to re-locate a meter to a more accessible location if needed.  Accessible core customer information – Our key	We will monitor and track our progress with this minimum expectation in a variety of ways:  • Each quarter, we carry out a 'Voice of the Customer' survey, covering a number of topics including satisfaction of those customers on our Priority Services Register. We will track this each quarter to make sure we are achieving our minimum target.  • Customer and Environmental Scrutiny Panel (CESP) and CCW Liaison Meeting reflects the interests and expectations of our customers. We will provide quarterly updates to our challenge group on our progress against the plans we have set out to achieve.  • We will provide regular updates at board level to review our progress on our customer improvement plans and endorse our future strategies.	As we share data and increase the number of our customers on our Priority Services Register, we need to carefully manage customer expectations around bottled water delivery, especially in the event of a large scale incident. Customers not sharing they are eligible for the PSR, or who do not want to be added to the register despite having additional needs.	Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.



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1.1 cont.		Compliant	Communications in alternative formats – We'll explore further translation services, particularly for those alternative languages most commonly used by our customers.  Smart metering – We plan to roll our smart meters across our region, which will give our customers greater control and visibility over the water they use.  Improving our support during an incident – We'll continue to deliver bottled water to those that need it the most, and we'll contact our customers in alternative form us.  Expanding ways to get in touch – We will introduce new contact channels such as live chat and SMS.	We regularly conduct reviews of our customer journey, and through these reviews we will complete ad-hoc testing to understand how well we are performing against our action plans within this expectation. This includes asking all affected customers, including those on the Priority Services Register, for their feedback after a water supply incident.		



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1.2 Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.		We want our customers to know the level of support available, and importantly that the information is presented in a way that customers can easily access and fully understand, no matter their need. We understand that part of this also entails equipping our partners with the relevant information for them to communicate effectively with their members.  Our initiatives to date:  Dedicated website page – We have improved the information on our website. This page can be found here https://seswater.co.uk/your-account/priority-customers.  A friendly welcome – We have introduced a welcome letter for customers joining our Priority Services Register.  Support information – Details of our support, and how to contact us are displayed on our website, customer letters (including bills) and emails. This includes email addresses, social media channels, our dedicated phone line, face-to-face locations and our postal address. Customers can self-serve to pay bills, submit meter readings and see how much water they use via our online MyAccount platform. In an emergency, customers can call us 24/7, 365 days a year. Details of our core customer information can now also be found on our water bills.  Customer leaflets – We have a number of customer facing leaflets to inform our customers about the financial and service-related support we offer. These are used at our community events, partner engagements and home visits.  Partner information pack – We've created a partner information pack so our partners can promote the support we offer to their members and in a clear and consistent way.  Partner page – We've launched a dedicated page on our website, promoting our key partner network and their key services and contact information. We will signpost customers to this page as and when necessary.  Simple sign up – We have created one simple online application form for our customers to this page as and when necessary.  Pilan English – Our customer communications are written in a friendly, plain English, and free from jargon. This is aligned	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.	We don't anticipate facing any significant challenges in meeting this expectation.	Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.  More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful'.



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1.2		Compliant	Our future plans:			
cont.			Partner newsletter – We'll relaunch our quarterly partner newsletter 'Connected' to increase the engagement and reach through our trusted partnerships, and equip them with improved information about our services for their members.			
			Customer friendly communications – We'll improve our written communications, including our complaint responses and bills, so they are consistently customer friendly and jargon-free. This will also include the redesign of our current customer bill. We will consider all vulnerabilities, including cognitive impairments (such as dyslexia) when completing these reviews.			
			<b>Enhanced application forms</b> – We will optimise our online application form, to make it even easier for customers to apply for the help they need.			
			<b>Telephone system</b> – We will make sure our telephone system is reviewed regularly and simplified where possible.			
			Enhanced welcome – We'll improve our welcome letter when customers join our Priority Services Register, by tailoring it to the customer's specific need, and whether the help requirement is considered transitory or longer term. This will also comply to Ofwat's PSR Standards and Defra's new GSS regulations (expected 2025).			
			Improved website accessibility – We'll review our website navigation and page structure to make sure information is easy to find, and labelled in a way customers understand. We'll also explore our options for working towards AA or AAA compliance.			
			<b>Continuous review</b> – We will monitor and continually evolve and improve the information we present to our customers, by working with and learning from our partners and stakeholder groups.			
			Alternative formats – we will expand our use of alternative formats (where possible).			



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1.3	Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.	Compliant	We believe that continual improvement is key to making sure our extra help services are truly reflective of our customers needs and preferences, now and in the future. We will continually to learn and involve our stakeholders and partners in the development of our plans to support customer who need extra help.  Our initiatives to date:  Stakeholder engagement — We regularly engage with our customer challenge group, Customer and Environmental Scrutiny Panel (CESP), as we recognise the importance of independent challenge on both our ongoing performance and our future plans. We also work with our partners to provide feedback on our services to make sure they are fully representative of our customers' needs.  Customer insight and engagement — We currently collect insight from several different sources, such as customer surveys, contact and complaint analysis, website analytics and our 'Voice of the Customer' programme. We regularly engage with our online customer panel 'Talk on Water', to get their view on our initiatives.  Other data sources — We capture learnings from our field and office front line agents who speak to customers on a daily basis. We also conduct root cause analysis on complaints to identify any corrective actions. Through our complaints data, we identify those on the PSR so we can compare their experience to those not on the register.  Best practise / learnings — Now we are part of the Pennon Group, we work closely with our colleagues across the other brands, sharing key learnings and best practise.  Our future plans:  Continued customer engagement — We'll continue to test our new initiatives through our online community panel 'Talk on Water', our Customer Scrutiny Panel, or through ad hoc customer research pieces. We will make sure our customer challenge groups fully represent a broad range of vulnerabilities (either through lived experience or experts in their field, representing their members).  Co-designing and collaborating — We'll start collaborating and co-designing our journeys, services	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.	We'll need to make sure our customer challenge groups represent a broad range of vulnerabilities when helping us design our services of the future. It may not always be possible to collaborate with customers with lived experience – we plan to work with our partners and wider stakeholder groups in these instances.	We will continue to host quarterly meetings with our customer and stakeholder challenge groups.



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1.4	Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.	Compliant	We monitor how we are performing in a number of ways, and routinely use what we learn to drive improvements.  Our initiatives to date:  'Voice of Customer' programme – We collect qualitative and quantitative insight through our Voice of the customer' programme which takes place quarterly. Through these results, we are able to directly compare how the satisfaction of customers receiving extra help compares to our wider customer base. We also receive customer feedback through our online customer panel 'Talk on Water'.  Website analytics – We actively track how our customers use our website so we can continually improve our user experience. This includes reviewing how our customer's behaviour changes during an incident.  Post incident research – We complete post incident research with all our customers to understand the experience they had with us during an incident, such as a water outage. We use this insight to improve our services.  Operational and system data – In addition to analysis of our quarterly C-MeX results, we routinely conduct post-call surveys to gather immediate feedback and carry out root cause analysis of unwanted and repeat contacts and complaints. We compare the results for those customers on our Priority Services Register to our wider customer base to identify areas for improvement. We also use system data to track the performance of our Priority Services scheme.  Stakeholder engagement – We regularly meet with local councillors, MPs and CCW to listen to their feedback and use it to shape our policies and customer communications. Through our partnerships, we work with organisations that represent customers who may have additional needs to help us design inclusive services and policies and communicate better with their service users. Our Customer and Environmental Scrutiny Panel also advises and challenges us as we deliver change and monitors our performance, reporting annually on our progress.  Customer data – We are continually improving the quality of customer data we hold and supplement thi	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.      We have weekly and monthly meeting with our senior leadership team and board members where we present our operational performance against our key performance indicators (KPIs).	Whilst we don't anticipate significant challenge in meeting this expectation, we need to be mindful that we may not always have the opportunity to capture feedback from customers who are on our Priority Services Register for a short period of time (defined as transient vulnerability, for example due to a short term illness). We will monitor this through reporting and consider and further developments if deemed necessary.	Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.



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1.4		Compliant	Our future plans:			
cont.			'Voice of Customer' programme – We'll broaden the range of questions we ask our customers on the Priority Services Register to cover a range of topics (such as bill understanding) so we can identify areas for improvement.			
			Quality assurance (QA) – We will embed a QA programme across our frontline office teams to monitor the effectiveness of our training (as outlined in Expectation 3.3) Through this we will get invaluable feedback on our customers' interaction with us, as well as how our advisors are performing.			
			Customer satisfaction measure – We'll implement a customer satisfaction measure across all our channels – including digital – to get feedback on how satisfied our customers are with our services. We'll compare the results for those customers on our Priority Services Register to make sure they are experiencing equal levels of service.			
			Speech and text analytics – We'll launch speech and text analytics to further deepen our understanding of every customer interaction.			
			Behavioural analytics – We will track how customers on our Priority Services Register interact with us, compared to the rest of our customer base. This includes the likelihood to complain, contact frequency or channel preference. We will use this insight to determine future initiatives.			



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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	As detailed in expectation 1.1 as soon as we become aware of a customer who requires extra help we make sure that we communicate in a way that meets their needs. We design our services with our customers in mind, making sure we provide an inclusive service for a diverse range of needs and audiences. We regularly seek the views of our customers, our customer challenge groups and expert partners to continuously improve our services.  Our initiatives to date:  Website accessibility – We've provided the accessibility tool ReciteMe on our website, which gives screen reader, alternate language translations and enlarged text. The toolbar also easily translates all our website content into more than 100 languages, including 35 text to speech voices. Last year alone, 48 languages were used via Recite Me, which shows the level of cultural diversity across our supply area.  Communication channels, SignVideo and other third parties – We've introduced SignVideo as a contact method, which allows customers who use British Sign Language to speak to us via a translator or speak to us via a live chat. The service is available 24/7, so customers can contact us in an emergency. We also provide our customer bills in alternative formats, and actively signpost customers to third parties should they require more specialised support.  Dedicated specialist support – We have expanded our home visits as we know some of our customers prefer face to face conversations. As well as using our dedicated field team, we also offer customers the option to visit us at one of our weekly community engagements, or our Head Office, so we can talk to them about how we can help face to face.  Support information – Details of how to contact us, and the support we offer customers who may need extra help, are displayed on all our channels, including our website and on our water bills. More information on how we plan to increase the awareness of the support we offer are outlined in Expectation 3.2.  Partnerships – We have partnered with several charities suc	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.      Maintain the ISO22458 through yearly audits.	The key challenge is making sure we design services that are fully inclusive and accessible for a full range of vulnerabilities. As such, the data we hold about our customers becomes ever more important.	Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.



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2.1		Compliant	Our future plans:			
cont.			Best practice – We have purchased the British Standard for Inclusive Service and are working towards compliance with the guidance.			
			Cross promotion of our schemes – Our 'Here For You' programme encompasses our Priority Services Register and financial support tariffs, and we'll continue to promote our financial schemes to our customers on the Priority Services Register so they are aware of all the support available to them.			
			<b>Customer &amp; stakeholder engagement</b> – As outlined in Expectation 2.3, we will continue to consult with our customers and stakeholders when making changes to our service offering.			
			Customer friendly communications – As mentioned in Expectation 1.2, we will continue to tailor and personalise our external communications making sure that, wherever possible, they are accessible to as many customers as possible. This will also extend to the redesign of our customer bill, where our aim is to make it more accessible to those with low English or low numeracy skills.			
			Improved website accessibility – We'll review our website navigation and page structure to make sure information is easy to find, and labelled in a way customers understand. We'll also explore our options for working towards AA or AAA compliance.			
			Co-designing and collaborating – As outlined in Expectation 1.3, we'll start collaborating and co-designing our journeys, services and policies with our partners and customers. We will explore working with customers with lived experience when designing these new services.			
			Kitemark for inclusive service – We will achieve the BS ISO 22458 Kitemark accreditation for Inclusive Service.			



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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 know the importance of offering a range of ways for customers to interact and community with us, in as way that works for our customers.  Our initiatives to date:  Communication preferences – We currently record our customers contact preferences and needs codes on our customer billing system. This guides how we communicate with our customers in the way that works for them.  Ways to get in touch – We offer a range of ways for customers to get in touch. These include face to face visits from one of our Here For You Officers and the option for customers to visit us at our Head Office in Redhill, Surrey, which is fully accessible. Last year, we also introduced SignVideo as a contact channel.  Alternative formats – As outlined in Expectation 1.1, we currently offer our customers bills in alternative formats, such as braille, large print, electronic PDF and audio CD.  Support information – As outlined in Expectation 1.2, details of our support, and how to contact us are displayed on our website, customer letters (including bills) and emails. This includes email addresses, social media channels, our dedicated phone line, face-to-face locations and our postal address. Customers can self-serve to pay bills, submit meter readings and see how much water they use via our online MyAccount platform. In an emergency, customers can call us 24/7, 365 days a year.  Our future plans:  Third party billing – We will explore the need for third party billing in our area.  Alternative formats – We plan to expand this service (where possible) to include other forms of communication, such as notifications around planned works.  Expanding ways to get in touch – We will introduce new contact channels such as live chat and SMS, which customers have told us would be useful.	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.      We will track the number of contacts or complaints we have received from customers on the Priority Services Register.	Whilst we don't anticipate any significant challenges in meeting this expectations, we are reliant on our customers keeping their details and information up to date, so we can meet their needs accordingly.	Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.  More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful.



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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 very much value the input from CCW, stakeholders and other customer representatives when making changes to our service offering and/or customer journeys. We use our established relationships with them to discuss our ideas and help shape our plans.  Our initiatives to date:  We regularly engage with our independent challenge group (Customer and Environmental Scrutiny Panel) when making significant changes, with a particular focus on the needs of customers who need extra help. For example we recently held a deep dive session on Smart Metering and the new PSR Standards.  We host regular sessions with the Consumer Council for Water (CCW), showcasing our plans and inviting challenge. Recently, we invited their feedback on our new debt journey and our re-designed Code of Practices. We also attend CCW's vulnerability workshops and consult with their vulnerability lead.  We maintain an active relationship with over 100 customers on our 'Talk On Water' customer panel, who regularly provide their feedback on our future initiatives, no matter how big or small! Over the last 12 months, we have completed 15 individual research pieces with our panel, from getting their thoughts on our new PSR page content and design, to what's important to them during an incident.  Finally, we regularly talk to our front line colleagues. For example we recently invited a group of our Customer Care agents to help shape our bill changes.  Our future plans:  We'll create a community of customer champions (Vulnerability Heroes) who can provide more detailed feedback as we develop our services so the needs of our end users are at the centre of our design thinking.  Make sure our customers needing extra help are fully represented on our customer challenge groups and panels (be it through lived experience or partner representation).  Develop an expert panel of stakeholders to work with the share best practise.  Work with other water companies across the Pennon Group to share wider learnings and best practise when designing and evolving our servi	As per Expectation 1.1, we will track progress through our customer and stakeholder challenge groups, clearly evidencing our decision making.      Written feedback from CCW, stakeholders and customer representatives.	As per Expectation 1.3, we need to make sure our customer challenge groups represent a broad range of vulnerabilities when helping us design our services of the future. It may not always be possible to collaborate with customers with lived experience – we plan to work with our partners and wider stakeholder groups in these instances.	To be able to clearly evidence how we have consulted with our customer and stakeholder groups when making significant changes to our service offerings.



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3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	As well our activities to raise awareness of our support schemes (as outlined in Expectation 3.2), we plan to identify customers who may need extra help through our continued work in the community and partners.  Our initiatives to date:  Community events – We've expanded our programme of community events. Last year we attended 30 events, including Run Reigate, Edenbridge and Oxted Show and Feasty Fest. In total, we reached an audience of over 100,000 customers.  Community engagements – We attended more than 100 local engagements across foodbanks, warm hubs and community centres. We've also worked with various local charities including Welcare, Crossroads Care and MHA which all provide support for vulnerable people within our community.  Partnerships – We've set up 40 partnerships with local authorities, charities, housing partnerships and many other organisations, to increase awareness and identify customers who need our help.  Partner funding – We have provided funding for a number of partner promotions (such as £350 in £10 Greggs vouchers through our partner NightWatch to support the homeless during the last Christmas period) to further expand our reach through our partner's promotional activities.  Training – As outlined in Expectation 3.3, our customer care advisors are universally trained to identify and promote our schemes and services.  Incidents – where there are incidents we work with Local Resilience forums to help support customers who may not yet be on our register.  Our future plans:  Expand our community events and engagements – We'll increase the range of community events we attend to reach a broader and more diverse audience.  Community projects – We will continue to support and increase our community projects (such as Christmas Hamper deliveries and Crossroads Care fundraising) through our employee 'Give A Day' scheme.  Increasing our partner network – We'll continue to increase our partner network, doubling the number of partners we work with, including partnering with those to help us get to	We will track our progress on this measure through our quarterly 'Voice of the Customer' Programme' and through our own internal reporting to show the number of customer joining the support scheme.	One of minor the challenges will always be identifying those customers who have transitory help needs i.e. who need our support for a short period of time. We plan to increase the awareness of our support (as outlined in 3.2), as well as work with our partner network to help identify customers with short term support needs.	The number of our customers on the Priority Services Register will increase to at least 28%.  More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful.



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3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Compliant	Awareness is crucial for effective support. We recognise that many vulnerable customers may be unaware of the resources available to them or may not fully understand how to access these services. To help our customers better find this information, our strategy prioritises proactive communication, leveraging the channels we have available to reach our diverse customer base.  Our initiatives to date:  Welcome letter — We currently send a welcome letter to every new customer joining our area. This signposts them to our services should they be struggling financially or need tailored or alternate communications.  Support messaging — We have enhanced the messaging on our communication channels to include information about our support schemes, such as on our website, across our social media channels and our bills. Most recently we have also added 'Here For You' messaging on our envelopes.  Promotional activity — To proactively raise awareness, we have also expanded the promotion of our support schemes across our digital channels at key points in the year. This includes a dedicated email campaign to over one hundred thousand customers promoting our financial and non-financial support schemes, and working with community partners to provide this information on their own channels. We have also recently created a short video, promoting our support across our social channels and website.  Events — We use community events and partnerships to target the areas where we believe a higher density of the population would need additional support.  Our future plans:  Expand our promotional activity — We'll develop year-round promotional initiatives as we're committed to the continued promotion of our support schemes through our regular promotional activities. We'll incorporate support scheme messagin into year-round promotional and content plans to make that customers are seeing relevant messaging at different touchpoints throughout the year. We will test this messaging with our customers and stakeholders, as well as monitor how wel	We will track our progress on this measure through our quarterly 'Voice of the Customer' Programme.      We will also measure the effectiveness of our promotional campaigns using our own internal success metrics, such as the number of click throughs, unique website visits etc.      We will use CCW's Water Matters report (for the awareness measure).      We'll use our data, such as uptake of support by region, to identify areas where more / targeted promotion is needed.	There are a number of minor challenges in meeting the awareness target for this expectation. These are listed below.  • We may struggle to increase the awareness of our support schemes in our more harder to reach communities.  • Despite increasing the messaging of support schemes and broadening our promotional activities in the last year, we have struggled to move the dial on our combined awareness percentage score.  • We know from our Voice of Customer Programme that customers on our Priority Services Register have , unsurprisingly, higher awareness compared to the rest of our customer base (55% versus 36%)  We therefore need to better target these customers through proactive, tailored and data led messaging.  *Full year scores from our 2023/24 results.	The awareness of our Priority Services Register and 'Here For You' schemes is greater than 75%.



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3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	Compliant	Our employees are our greatest asset in delivering exceptional customer care and we are investing in training designed to equip our teams with the skills and knowledge necessary to identify and support customers who may need extra help. We want to make sure that every interaction with our customers is respectful, informed, and genuinely supportive.  Our initiatives to date:  PSR information – All PSR information about our customers is held on our secure billing system, which is visible to our front line teams. Our advisors are able to adapt their service accordingly.  Quality Assurance (QA) – We have a check process in our QA framework. If the advisor fails to recognise vulnerability triggers, they will be given additional training.  Specialist training – We've provided specialist training to support our customer facing office teams, so they're able to better support customers going through difficult situations, such as a bereavement or mental health illnesses.  Training Academy – We've launched a new training module within our Training Academy to provide vulnerability training new customer service advisors.  Dementia Friends – 166 colleagues have completed Dementia Friendly training.  Incident training – Last year, we took part in a joint exercise with Affinity Water to test our approach to providing alternative water in the event of a water emergency. A number of colleagues from across the business took part, and as part of this we also practised delivering bottled water to volunteers' homes to simulate real life deliveries to our Priority Services Register customers.  Our future plans:  Expanding vulnerability training – We will roll out vulnerability training to all customer facing colleagues, including our field teams. We'll also make sure this extends to all our suppliers who work with us, so we are consistent in our approach.  Specialised training – We will work with our partners to continue to deliver specialised training across our business, making sure we cover the full and diverse range of vulnerabil	We will track and monitor the number of our colleagues completing vulnerability training through our Learning Management System.	No challenges in meeting this expectation.	100% of customer facing colleagues will have completed vulnerability training by 2030.



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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.	Compliant	Data sharing helps us identify customers who may need our support, and it also helps us to reduce communication burdens associated with multiple disclosures. Through these agreement's we're able to receive (and in some cases also the share) information about our customers who should be on the Priority Services Register. By having this information we can also identify if a customer might benefit from one of our financial support schemes, such as Water Support.  Our initiatives to date:  Data shares – We've established data sharing agreements with UK Power Networks, and Southern Water with our customers' consent, so they don't have to give the same information to multiple organisations. More recently, we have also completed a data share with the DWP.  Direct referrals – We're proud to have set up relationships with many trusted partners, including Age UK Sutton and Epsom & Ewell Citizens Advice. By receiving direct referrals from our trusted partners, we're able to automatically add our customers to the Priority Services Register (or one of our other support schemes) without the need for them to complete an application form.  'Tell us once' service – We have partnered with Life Ledger, which is a service that helps families deal with death notifications, removing the need to notify numerous organisations following the death of a loved one.  Our future plans:  Historical data share – We are working with UK Power Networks to share all historical customer data.  Open data – Open data allows our customers, community and stakeholders to access information about water quality, usage, and management practices and performance, promoting transparency. It helps the public and regulatory organisations to hold government agencies and utilities, including ourselves, accountable for performance and decisionmaking. Alongside the rest of the industry, we will be sharing data about our support schemes.  Expanding data shares – We plan to increase our customer sharing data arrangements, and we'll do this by introducing further dat	As per Expectation 1.1, we will monitor and track our progress through our customer and stakeholder challenge groups.	There may some minor challenges in 'matching' customer details across different data platforms, which may lead to some manual work before data sharing can commence. In addition, on some occasions we need to provide additional support to smaller community based organisations when setting up data share agreements.	We will proactively seek data sharing opportunities with energy suppliers, housing associations, resilience forums and community groups across all our supply region.  We will fulfill our obligations under existing data share agreements.



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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	Once we become aware that one of customers requires extra help, we capture and store this information securely within our customer billing system. By having this information, we are then able to tailor our support accordingly.  Our initiatives to date:  Our customer billing platform (Salesforce) offers several tools to capture and store information about our customers' extra help needs securely and compliantly. These include:  Secure login – This is protected with a multi factor authentication.  Data Encryption – The data is we hold is encrypted.  An Audit Trail – We have the ability to track all data access and modifications, providing a record of who accessed the information and when.  Access Controls – We have set up granular permission controls restrict access to customer data based on user roles and profiles.  Regular Security Audits – The platform we use (Salesforce) undergoes regular independent security audits to ensure its platform meets the highest security standards.  Cyber awareness training – We have completed company wide cyber awareness training. We also have existing procedures and polices in place in the event of a data breach, and these are continually reviewed.	We use a range of technical tools to manage and monitor access. These are outlined below;  • Salesforce utilises a multi-layered security approach to prevent data leaks.  • Salesforce provides a suite of technical tools for managing and monitoring user access. This allows administrators to define precise permissions for each user, ensuring they can only access the data they need for their specific role.  • System administrators hold the keys to the data kingdom. Salesforce enforces secure access procedures for administrators, making it harder for unauthorised individuals to gain access to sensitive information.  • Field-Level Security enables administrators to restrict access to specific data fields within a record. This ensures that users can only see the information relevant to their tasks, further minimising the risk of exposure.	Through the evolving cyber landscape, attackers are developing new ways to exploit systems, steal data, and bypass defences. This constant evolution means staying ahead of the curve is a challenge.  Phishing scams and other social engineering tactics are also becoming more sophisticated. Hackers prey on human trust and emotional manipulation.  We employ a team of experts whose sole purpose is to put strategies in place to keep information about our customers safe and secure.	Zero data breaches.



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4.1 cont.		Compliant	Our future plans:  Through Salesforce, we will deliver on-going improvements to our customers billing platform. We work closely with them, and our wider business, to ensure the needs of customers are satisfied.	Salesforce automatically logs user activity with audit trails, creating a detailed record of who accessed what data and when.  These audit trails provide valuable insights in case of suspicious activity or a potential breach.		
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	A key part of our strategy is keeping details and information about our customers' needs up to date. This is particularly important for customers who may require temporary help, such as support during a short term illness, and therefore may not need to be our the Priority Services Register long term.  Our initiatives to date:  Biannual check-ins — We have introduced a biannual check with our customers who are on the Priority Services Register each year to check if their details are up to date, or if their situation has changed.  Regular information checks — We regularly check a customers' information is up to date each time they contact a member of our Customer Care or Extra Care Team — our advisors use a 'data completeness bar' on our customer billing system as a way to identify if further contact information — such as a mobile number — is needed. Such information is particularly important in event of an incident. If the customer is shown to be on the Priority Services Register, a further check-in is completed to see if the customer needs anything else from us.  Our future plans:  Tailoring our biannual check ins — We will continue to proactively 'check-in' with our customers on the Priority Services Register every two years, but we'll tailor the way we communicate with customers with lifelong conditions versus those who may have shorter term extra help requirements. We will also tailor the approach to the 'check-in' depending on the customers needs' code and communication preferences. For those with transitory help requirements (such as short term illnesses) we will set up a process to complete more regular check-ins as we recognise some customers may only need our support for a shorter time period.  Innovative check-ins — We'll explore opportunities to complete check-ins through other key customer touchpoints, such as through our customer facing portal MyAccount.  Nominee contacts — We'll get in touch with any nominee contacts listed on the customer account when checking if the information we hold is current	We have a monitoring mechanism in place which regularly reports on the start, end and review date of customers on our Priority Services Register, to keep track of who we need to contact (and when).      We report on our performance through our Customer Committee and customer challenge group, the Customer Scrutiny Panel.	We are reliant on our customers providing us with accurate information when we contact them to check their details are to date. This also extends to having accurate information about any nominee contacts listed on our customer accounts.	We will contact 90% of customers on our Priority Services Register every two years.



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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	Whilst the industry level and indeed cross sector conversation and work regarding aligning and centralising Priority Services Register is ongoing, we have been considering how we can design our records of needs with the aim of reduce the communication burden on customers.  Our initiatives to date:  Aligning needs codes – We have aligned our 'needs codes' to the industry, making sure our records are easy accessible and close to industry standard as possible.  System development – We have developed our system so that our customer facing advisors are alerted to a customer who is on our Priority Services Register as soon as they have passed security and gain access to their records, meaning they are aware of the kind of support the customer needs and know not to promote the service.  Revalidation – As covered in Expectation 4.2, we revalidate our customers details every two years to capture and change any additions to needs codes or removals would then be communicated to our partners in accordance with our data share agreements. This means the data we hold, is as up to date as it can be.  Our future plans:  Data capture – We will continue to keep the records of our customers up to date through our activities as outlined in Expectation 4.2.  Industry cross collaboration – We are part of the industry working group to share best practise around data capture, data sharing and exception management.	As referenced in Expectation 4.2, we will regularly check the information about our customers is accurate and up to date through our data revalidation processes.	We know from our customer and stakeholder engagement that not everyone openly discloses information about their situation or specific needs. This can be particularly the case for customers in harder to reach communities. The result is we may not always have accurate and up to date information about our customers' needs.	Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.  We will contact 90% of customers on our Priority Services Register every two years.



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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 understand the importance of making sure our customers are in control of how their data is used and we take our responsibility in communicating their options very seriously.  Our initiatives to date:  Data sharing options – All our Priority Service Register touchpoints (including our webforms and system applications used by our agents) have clear consent options which explain how we will hold, use and share our customers sensitive data.  Substantial Public Interest (SPI) – To facilitate the sharing of data with our network distribution operators we moved to an SPI data model to facilitate the sharing of customer data. Although at this stage we only share new applications, changes or removals, we sent a communication to all customers on our existing Priority Services Register to explain the change and gave them the option to opt out. To do this we collaborated with Thames Water to align our letters as closely as possible.  Revalidation – As covered in Expectation 4.2, we recognise that people's views on how we use their data may change over time. This is why we make sure that we provide information on accessing our privacy statement when our Priority Services Register customers pass through the biannual revalidation process.  Our Privacy statement – Although we provide information on the basis upon which we hold use and share Priority Services Register data on the relevant pages of our website a detailed explanation can be found in our Privacy Statement. Customers are given a link to the statement on our corporate website Priority Services Register page and across our external communication channels.  Our future plans:  Enhancing MyAccount – We're currently developing our online customer portal so customers can apply for the Priority Services Register.  Improving the customer journey – We're planning to review the end to end Priority Services customer journey, and as part of this we'll focus on the efficacy of our 'consent' model to make sure it's easy to understand and leads to customers making a choice that	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.      We will track the number of contacts or complaints we have receive about how our customers' data on the Priority Services Register has been used, and will be used.	We need to be mindful that customers may not always see our communications about how their data will be used. We need to make sure this information is as visible as possible throughout the customer journey, and is accessible to range of audiences.	Zero complaints from our customers on the Priority Services Register about how their data is used.



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5.1	Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.	Compliant	We're fully committed to supporting customers who need extra help, both now and in the future.  We have produced a draft vulnerability strategy, which has been developed using customer and stakeholder feedback, as outlined in Expectation 2.3.  As per the guidance, we published our draft plans on the our website at the end of June 2024. Having referred to various accessibility guides when designing it, our draft strategy document is accessible to a range of audiences.  After our draft strategy was published, we sought feedback from Ofwat, CCW and our customer challenge group. We also posted promotional material across our social channels, and emailed our partners directly asking them for feedback on our draft strategy. We received a very limited response. We also joined the industry vulnerability sub-group to share knowledge and best practise, which proved invaluable.  We have reviewed our strategy against the new PSR Standards, and made necessary plans where required.  We intend to publish our final strategy at the end of June 2025, and commit to reviewing this on a yearly basis.  Finally, we welcome any feedback from our stakeholders on our final strategy.	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.      We will await feedback from our regulator Ofwat, on how well we've addressed this expectation, including any further areas to focus on.	We will review our draft plans once our we've received feedback on our business plan for the next business period (PR24).	We will consider all our key metrics when measuring success of our vulnerability strategy. These include:  Achieve an average satisfaction score of at least 95% for customers on our Priority Services Register.  More than 80% of customers receiving support, feel that SES Water's extra support services are 'helpful.  The awareness of our Priority Services Register and 'Here For You' schemes is greater than 75%  We will complete vulnerability training for all our customer facing colleagues.



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5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	As the number of the customers on our schemes increases, it's critical that our support schemes remain fit for purpose and have the necessary funding and focus to continue to support our customers with extra help needs.  Our initiatives to date:  Customer insight – We supplement our operational and system data with insight from the consumer data company, CACI. This gives us demographic information about our customers and their day to day lives, such as financial circumstances and difficulties, wellbeing and general attitudes. This insight improves our understanding and identification of customers who need extra support, so we can better target our proactive communication campaigns.  Monitoring future developments – We currently use data from a variety of public sources, such the Office of National Statistics to understand the future trends, such as predicted population growth in our region. We also work closely with our partners to understand future demand in their respective areas.  Our future plans:  Industry sub group participation – We're pleased to be a member of the vulnerability sub group, and look forward to collaborating with other water companies in this area by sharing best practice and providing additional insight to meet this minimum expectation.  Monitoring future developments – We'll continue follow national and local developments that may impact the demand (both short term or longer term) for our services.  Horizon scanning – We will stay ahead of industry trends by working closely with other support organisations (including our partners) across our supply area, utilising their expert knowledge, so we understand emerging vulnerability trends, and best practise both within and outside the water industry.  Predicting future behaviour – As outlined in Expectation 1.4, we'll use our operational and system data (such as payment or contact patterns) to help predict customer behaviour. We will use this insight to determine future initiatives to bridge any gaps in our service offering.  Customer Insight	As per Expectation 1.1, we will monitor and track our progress through our quarterly 'Voice of Customer' programme, and our customer and stakeholder challenge groups.      We will await feedback from our regulator Ofwat, on how well we've addressed this expectation, including any further areas to focus on.	Whilst we have the data to show the likely help needs of our customer today, we need further analysis to show (at a national and regional level) the potential needs of our customers in the future, recognising that situations can change.	We will continue to refresh our customer data each year.

## **PSR Standards – Summary**



Section	Standard	Compliance	Implementation
	Companies should refer to register as 'PSR' or 'Priority Services Register' rather than using their own names.	Compliant	We use the term <b>PSR</b> and ' <b>Priority Services Register</b> ' across all our customer communications and touchpoints. We tend to use the latter in our communications as feel this is more customer friendly.
			It is also included in our training material for frontline agents.
	Customers who are likely to benefit from being on the PSR include those who meet one or more of the following criteria:		We are aligned to the water and energy industry defined needs codes to facilitate data share.
	Of pensionable age;     Are disabled;		We make sure we are continuingly up to date with standards by our attendance at industry working groups and working with DNOs to keep ahead of any changes.
Definition	Have an illness which affects their day-to-day life;     Are pregnant or live with children aged 5 and under;	Compliant	Our Training Academy has a module focused on our needs codes and supporting customers through the disclosure process. And in addition to this, we make sure
	Have a mental health problem;		the needs codes we have captured are matched with the appropriate service requirements, based on the customers specific set of circumstances or condition.
	Have a hearing or sight condition;		
	Have a poor sense of taste or smell;     Are unable to or have difficulties in communicating in English or Welsh		
	Have a cognitive impairment, learning disability, developmental conditions or dementia;		
	Require additional showering or bathing due to a health condition;		
	Have physical impairments; or are going through a disruptive life event, such as bereavement.		
	The above list is non-exhaustive and companies should consider the full range of customers who may benefit from <b>PSR</b> support. This includes customers who may only benefit from		We conducted extensive customer research with customers ahead of our PR24 submission to understand their needs and service requirements.
Needs and services	PSR services for a short or intermittent period of time.	Compliant	We continuously consult with industry colleagues and the wider Pennon group, DNOs and Energy suppliers to learn from their expertise. We horizon scan to ensure we stay up to date.
			As we facilitate date share we are committed to remaining aligned to the industry recognised codes.



Section	Standard	Compliance	Implementation
Needs and services	Companies should provide customers on their PSR with relevant services or service adaptations. These are likely to include:  • Delivery of alternative water supplies during an interruption; Knock and wait facilities (where visiting staff know to allow extra time for customers to answer the door);  • Additional communications, contact, or support around outages or incidents;  • Additional metering support or services by the company;  • Alternative communication formats such as braille, audio information, large print, etc;  • Arrangement of additional presence during visits;  • Third party support (where a nominated trusted contact is allowed to manage a customer's account on their behalf);  • Password facilities (where staff use a password when dealing with a customer);  • Signposting to other support and services, both within and outside the company; and  • Priority contact before or during actual or potential outages to understand impact and / or ask if further support needed.  The above list is non-exhaustive and companies should consider the full range of extra help services they can provide to their PSR customers.	Compliant	We provide a range of services to support customers based on their needs. We have information on our website on the support we offer during incidents.  We regularly attend industry events, including CCW's vulnerability workshops, to share best practices and keep up to date with any social, technological, or regulatory changes.
Reach	All companies should make all reasonable endeavours towards having a comprehensive picture of <b>PSR</b> service requirements of individual customers in their area.	Compliant	We work with our specialist partners to get information on the service requirements of customers in our area.  Our partners help us shape and inform our PSR categorisation matrix.  We also use CACI data to target campaign work for our support schemes and tariffs.  Our online complaints form asks customers to disclose any PSR requirements to support ensure our complaints team provide the appropriate support.
Redeli	Companies will grow their <b>PSRs</b> beyond the levels achieved by incumbent companies during the 2020-25 period. (We estimate that as of 2021, up to approximately 50% of households in England and Wales may be eligible for <b>PSR</b> services).	Compliant	We have promised to increase our <b>PSR</b> reach to at least 28% by 2030.
	Eligible customers' level and nature of needs are likely to vary significantly. Therefore, as they take steps to grow their <b>PSRs</b> , companies should be mindful to prioritise those customers at greatest risk of harm.	Compliant	Our partners help us shape and inform our <b>PSR</b> categorisation matrix – we monitor our <b>PSR</b> registration levels to ensure we can serve our customers in all service scenarios.
	Companies' records of customers' <b>PSR</b> service requirements should be kept up to date and reviewed with an appropriate degree of regularity.		We continuously meet and exceed our targets in this area and have promised to continue to do so.
Data checking	At minimum, all companies should:  • achieve actual contact with 35% of households on the <b>PSR</b> every two years; and  • attempt contact with 90% of households on the <b>PSR</b> every two years.	Compliant	



Section	Standard	Compliance	Implementation
	When customers request to be added to the <b>PSR</b> , companies should implement this within relevant systems as soon as possible, and relevant support services provided as soon as possible.	Compliant	We operate an automated process for post sign up communications to customers.  During incidents we expedite sign up to ensure we reach customers who sign up during incidents.
Registration	When customers have been added to the <b>PSR</b> , companies should actively confirm this with the customer, for example, through a welcome letter or email. This communication should provide information about the support that customer will receive.		When a customer joins our <b>PSR</b> , they will receive a welcome letter which confirms they've joined. This is currently generic and is not available in alternative formats.  We recognise we can tailor this more and we will do this when making the changes
	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.	Partial Compliance	to our communication to include compensation payment information for our <b>PSR</b> customers (to be confirmed by DEFRA during 2025).  We will also work towards sending communications in accessible formats.