Data Assurance Sumary APR 2023/24





July 2024

1. About this document

In the course of the year, we publish a range of information on the services we provide and our performance against key targets, including those contained within Ofwat's 2019 Final Determination. Building and maintaining a high level of customer trust and confidence is of paramount importance. We, therefore, have in place robust assurance arrangements to ensure that the information we publish is reliable and accurate and that we are providing the level of information and delivering the level of service that our customers expect.

We see assurance as integral to the work that we do do and, as we continue to and, as we continue to engage with our key stakeholders, we will use their feedback to tailor our assurance activities to match their expectations.

In April 2024, we published <u>Our Assurance Activities for 2023/24</u>. Having firstly assessed the risks, strengths and weaknesses associated with meeting our obligations and commitments, we outlined the measures we intend putting in place to assure all relevant data. This Data Assurance Summary, published alongside our Annual Performance Report (APR), summarises the outcomes of this assurance.



2. Summary of our assurance approach

Within the business we have well-established governance and accountability processes. We continue to build on this foundation and for our assurance activities for 2023-24, we incorporated lessons learned from Ofwat's investigation in to our Leakage and Per Capita Consumption reporting, these include:

- The delivery of a "Just and Fair Leadership Programme" to all managers during 2023 to help embed a culture of transparency and speaking up.
- Enhanced the framework that we use to assess the reporting methodology for our Performance Commitments.
- The delivery of training for staff involved in the reporting of data for the Annual Performance Report.
- The launch of a mandatory training programme for managers covering our organisational values.

We have an established framework to provide for the effective management of risk. We operate the 'three lines of assurance model' which distinguishes between first line (risks and controls), second line (oversight functions) and third line (independent assurance). This is illustrated in the image below.

In the first line of assurance, management has accountability for identifying risks and managing these by developing and maintaining sound processes, systems and controls in the normal course of their operations.	In the second line of assurance, the Regulation and Finance team have accountability for providing the framework and governance for regulatory reporting; and In the third line of assurance, our Audit team, review the assurance framework and provide risk-based assurance on individual elements

Our data assurance framework is underpinned by four key components:

- **Robust assurance principles** we operate a 'three lines of assurance model', targeted at areas of greatest risk;
- Clear ownership and accountability we have clear lines of ownership and accountability for both the delivery of performance and the accuracy and reliability of the data provided;
- Effective governance we are subject to scrutiny by our Board, Audit Committee, Quality and Safety Committee and the Dŵr Cymru Executive (DCE) with additional challenge provided by the Independent Challenge Group (ICG);
- Transparency and accountability we publicly report on our performance and hold ourselves to account where we do not meet our commitments



3. Data assurance summary

3.1 Annual Performance Report (APR)

This is an annual report which provides cost information, financial performance and information on our performance against our customer outcomes and commitments. The latest APR has been published alongside this document in July 2024.

Assurance Activities		
All data had been signed off by individual data owners and their Heads of Service. The Regulation and Finance teams have reviewed the data and ensured stated processes were followed through due diligence sessions. The majority of data owners have attended external assurance meetings. Our Dŵr Cymru Executive reviewed the finding of the assurance activities undertaken and approved the final APR before issuing to our Audit Committee and finally, our Board gave us approval to publish at their meeting on 4 July.	Complete	
Information packs containing all relevant information were made available on our dedicated Intranet page for all data owners, these were also reviewed in one-to-one meetings	Complete	
Between April and June and prior to the external audits, due diligence meetings took place with all data owners. Amongst the matters reviewed were:	Complete	
 The application of the appropriate; Methodology Statements and reporting requirements; Assumptions and judgements; and Data Commentaries explaining performance by reference to targets and historical data. 		
Verification checks by reference to previously reported data were also carried out.		
A Board Assurance Statement is available for all data contained within the APR and can be found in the Annual Performance Report Overview document.	Complete	

3.2 Annual Report and Accounts

This is an annual report which allows stakeholders to assess our business model, strategy, operation of our business, including its governance, and our results and financial performance, set within the context of our strategic objectives. Our Annual Report and Accounts is published on our website in July each year, and our half-yearly Interim Report is published in November each year.

Assurance Activities	
Licence /regulatory compliance assured by Compliance team.	Complete
Close liaison with the Regulatory Reporting Team to ensure consistency of information contained within the Annual Report and Accounts and the Annual Performance Report.	Complete
Statutory audit undertaken by independent External Auditors who issue a report to the Members of the Company within the Annual Report and Accounts.	Complete
Final draft critically reviewed by Audit Committee prior to review and approval by the Board, and submission to Members as part of the Annual Report and Accounts.	Complete
Board approval before publication.	Complete



3.3 Bioresources Market Information

Market information on where Bioresources are produced and the quality of data is key to supporting the Bioresources market in so far as it helps promote and encourage efficient entry and development of the market.

To allow third parties to identify market opportunities and thus facilitate discussions companies are required to publish Bioresources Market Information as frequently as they deem necessary, but this must be updated at least annually. The annual publication must be made by 31 July each year.

Assurance Activities	
The data assurance programme was implemented as planned. There were no material issues identified and the governance stages, e.g., sign off of data at different levels operated as planned. Detailed internal Methodology Statements have been developed which include a step-by-step guide on how the data is obtained, the checks and balances in place, any assumptions made, and any exclusions applied.	
The Head of Service and the Biosolids Manager both undertook a full review of the data and methodologies and verified them against historic information and applied operational experience. All data has been signed off by the data owner, his manager and the appropriate director.	
Jacobs (our Technical Auditor) undertook a process and data review in accordance with an agreed Audit Plan. Jacobs concluded that the data is accurate and in line with published guidance.	

3.4 PR24 Data and Business Plan Submissions

Every five years, Ofwat sets limits on the prices which each water company in England and Wales can charge to their customers and sets the performance targets that they must achieve. This process is known as a price review. Ofwat is currently working on the price review for 2024 (PR24) that will cover the prices, investments and service levels for the period 2025 to 2030. Revenues are set to enable companies to deliver the services required of them over the period, including allowances for maintenance of assets, ensuring security of supply, meeting drinking water and environmental quality requirements, and covering the costs of financing the business.

It was vital for the business that we prepared a sound regulatory business plan for submission to Ofwat as part of the price review, to ensure that we secure the required investment to provide a resilient service to customers and the environment over the long-term. Our assurance framework therefore includes measures that ensured that a high quality PR24 submission was delivered on time.

Assurance Activities	
The Board played an active role in the development of the PR24 business plan. Meetings on all main aspects of the plan were held monthly with a particular dedicated focus at Board Strategy days in November 2021 and November 2022. The Board continued to be involved in the development of the plan at each meeting through to provision of an assurance statement and submission of the plan in October 2023.	
A PR24 Steering Group met monthly and reported on progress to the executive team. A Detailed programme plan was used to track deliverables.	Complete
Attendance at Ofwat workshops on given subjects. Regular liaison meetings with Ofwat Director for Wales. Tracking and responding to Ofwat consultations.	Complete
A full assurance plan was developed to provide evidence to the Board and Ofwat on the quality of the business plan and the process followed in preparing the plan itself.	Complete



3.5 Our Published Charges

We are required to publish a number of charges schemes each year in compliance with Licence Condition D and Ofwat's Charges Scheme Rules. These documents set out the company's charges for services provided and the terms and conditions of those charges. The documents are:

<u>Scheme of Charges</u>– This document sets out the company's charges for water and sewerage services for household and non-household customers.

<u>Wholesale Charges Document</u> – This document sets out the primary charges for wholesale water supplies and services to eligible sites that could be supplied with water by a water supply licensee with a retail or restricted retail authorisation. This document also includes non-primary charges that would be payable by a water retailer for sundry services provided by our wholesale business.

<u>Developer Services Schedule of Charges</u> – This document sets out the charges for new connections and other activities to support developers.

Assurance Activities		
Charges policies are reviewed and agreed by our Charges Policy Steering Group, which meets monthly and is chaired by the Head of Charges and Regulation. A compliance manual is maintained which details how our policies are compliant with Ofwat's Charging Rules and Guidance.	Complete	
All charges calculations are subject to checks within the Charges team. An external peer reviewer checks all key models and calculations. Charges are reviewed and approved by the Head of Charges and Regulation and the Strategy and Regulation Director, prior to provision to Board.	Complete	
External assurance on our approach to charges is carried out by Jacobs, who provide a report to the Board.	Complete	
Indicative and Final Charges are presented to the Board who provide and publish assurance statements for each set of charges.	Complete	





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