

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	<p>At Welsh Water, we have adapted our approach to communicating with customers, by offering the following choices:</p> <ul style="list-style-type: none"> •Braille, Large print, coloured paper (for neuro-diverse customers), audio (CS/MP3), Easy Read format bills and bills read over the telephone. •Website accessibility service (Recite), which includes translation services for 53 languages. This has recently been enhanced by the introduction of the British Sign Language video service. •Language line within our contact centre which includes translation services in 240 languages (this is in addition to our inhouse Welsh language team). <p>Through our priority services register, we offer customers priority contact during incidents and the provision of alternative water supplies, which we will deliver to those customers who are unable to get to distribution points. We have implemented a 4 tier approach based on individual customers needs from highest priority so that customers expectations are met. Alongside this we send PSR customers notifications through various channels on progress and where possible provide advanced notification to store water and water station locations.</p> <p>Following post incident research we have amended our auto-enrolment age from aged 90+ to 80+ throughout the last year, this ensures we have visibility of those customers that may be digitally excluded, unaware of the register and impacted based on their geographic locations (rural)</p> <p>Additionally, we provide the option of third-party billing (friend, family member or carer), nominee services for all account matters, password and knock and wait services. We have established a specialist support team to manage our financial assistance and priority services and they are trained to recognise and respond to the signs of vulnerability, adapting their approach to the requirements of the person that they are dealing with.</p> <p>We also recognise that some of our non-household customers (such as schools, hospitals and care homes) provide services to people that need extra help. We hold details of these sites within our operational and GIS systems to ensure that our operational teams can prioritise support to these sites during incidents.</p>	<p>Feedback from customers receiving extra help services (Rant and Rave, Speech Analytics, C-MeX raw data) and insight from our quality framework.</p> <p>Monthly monitoring sessions of customer complaints and quarterly C, D and B-MeX results</p> <p>Monitoring of website activity and requests for extra help</p> <p>Customer and stakeholder research of our management of incidents (company research, ICG review and Ofwat/CCW research).</p>	<p>Ability to meet the needs and expectations of all PSR customers during large scale incidents as the number of customers registered increases.</p>	<p>Satisfaction of customers registered for extra help services in line with CCW manifesto of 95% satisfied</p> <p>Increase the number of customers who are registered for help with a PSR reach target of 25%</p> <p>Attempt contact with 90% of priority service customers every 2 years to confirm their ongoing requirement for extra help.</p> <p>Actual contact with 35% of priority service customers every 2 years to confirm their ongoing requirement for extra help.</p> <p>100% new registration letters sent to all PSR customers in line with the new PSR Standard</p> <p>Maintain ISO 22458:2022 accreditation</p> <p>Post incident customer satisfaction of 80% satisfied</p>
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Compliant	<p>We make the information about our extra help available in many ways and focus on making sure that it is clear, concise and easy to understand and, as such, all written communications are subject to 'Tone of Voice' checks, ensuring that we strike the right balance in our message, signpost accordingly and guard against the use of jargon. We use feedback gained from our customer insight processes to ensure our bill design and contents are reviewed regularly.</p> <p>This information is presented on our website and publications. Additionally, we have recently updated our website to include a dedicated area about what can be expected during incidents including how we provide alternative supplies. CCW has confirmed that this information is accessible and comprehensive. Alongside this, we have a dedicated page 'help with your bills' on our website that holds all the support available to customers financial and non-financial.</p> <p>Our webpage is rated AA+ for accessibility and is monitored and audited on an annual basis through our ISO accreditation to ensure we support our customers.</p> <p>All customer facing colleagues have received training on identifying, supporting and escalating vulnerability and this is maintained through an annual refresher process ensuring that content is appropriate based on any new trends/observations.</p> <p>Information on our priority services and financial assistance schemes is provided to our network of partners. We provide training to the employees of these organisations, allowing them to refer customers to us via our online portal (REACH). Our community outreach team also promote the extra help that is available through work that they do in towns and communities across Wales. They use a world language map to identify the language needs of non-English/Welsh speakers and use translation tools to discuss the additional services that we provide.</p> <p>Customers can seek redress if they are not satisfied with the level of service they receive</p>	<p>Feedback from customers receiving extra help services (Rant and Rave, Speech Analytics, C-MeX raw data) and insight from our quality framework.</p> <p>Undertake periodic reviews of our range of financial and non-financial extra help to determine development of future services.</p> <p>Annual customer research of customers receiving extra help to understand satisfaction of our services and identify areas for improvement.</p> <p>Digital customer journey audits to understand the accessibility of our digital services and the content on our website.</p>		<p>Maintain ISO22458 Inclusive Service accreditation</p> <p>Satisfaction of customers registered for extra help services in line with the CCW manifesto goal of 95%</p> <p>CSAT performance of 9.3 out of 10</p>
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	<p>We are continuously looking to improve all of our services, including those to customers that need extra help. We do this in a number of ways:</p> <ul style="list-style-type: none"> •Feedback through our customer insight processes. •Testing new services or changes to services with different groups of customers, including those customers who need extra help. Our most recent example of this was changes that we made to our unmeasured bills ahead of annual billing 2024 and 2025. •We hold an annual event with partner organisations to share good practice and get feedback on the work we have done over the previous 12 months, as well as identify areas where we can make improvements or address an underserved group of customers. •Benchmarking and sharing of best practice with other companies within and outside of the sector, including the Customer Service Network (water sector), Collaboration Network (cross sector), Welsh Government's Income Maximisation Task & Finish group. An example of the benefits that this brings is the work that Cardiff and Vale Credit Union does to support our range of support to their customers, following a discussion we led at the Income Maximisation Task & Finish group. •Regular updates on performance and services to our Independent Challenge Group. An example of how this has influenced our thinking is that we are looking at how we will support low-income households as we roll out smart metering in AMP8. •Monthly Teach Talks with consumer representative bodies. An example of how this has influenced our services is the recent introduction of our SignVideo service following a talk from British Sign Language. •External and internal post incident reports, particularly any learning as to how we have managed our priority services customers. Following the December 2022 freeze thaw incident, we commissioned our Independent Challenge Group to carry out a review of our customer response to the incident, including those customers that need extra help. The findings from this review are now built into our incident management process. 	<p>Feedback from customers receiving extra help services (Rant and Rave, Speech Analytics, CMEX etc) and insight from our quality framework. We will build in the feedback from the newly established framework for customer research of how incidents are handled.</p> <p>Monthly monitoring sessions of customer complaints and quarterly C, D and B-MeX results</p> <p>Usage of extra help services</p> <p>Annual research of customers receiving extra help services to understand satisfaction and identify areas for improvement</p> <p>Regular external stakeholder reviews of our extra help services and vulnerability strategies (such as CCW and ICG).</p> <p>Quarterly review of customer journeys and digital customer journeys</p>		<p>Awareness of our priority services and financial assistance schemes (as reported through CCW's Water Matters report)</p> <p>Colleague competency and confidence following training with a score of 4.5/5 in identifying and responding to vulnerability</p> <p>Satisfaction of customers registered for extra help services in line with the CCW manifesto goal of 95%</p> <p>ISO 22458:2022 accreditation</p>

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	<p>We use a range of customer feedback tools and insights to monitor customer satisfaction and identify opportunities for improvement. This includes:</p> <ul style="list-style-type: none"> •our daily customer insight tool which asks all customers who have interacted with us for feedback on their experience •root cause analysis of written and non-written complaints and chase contacts. •performance measures across our customer journeys, which have been designed to recognise customers that need extra help. •C-MeX survey call data. <p>Our Customer Engagement Action Group reviews the themes/trends arising from this insight and will develop the improvement plans required in response. We also compare how insight from customers that need extra help compares to the generality of our customers to ensure that they are no less satisfied (our results show that customers that need extra help have higher satisfaction levels). In recent months we have implemented Speech Analytics software which will enhance this data set.</p> <p>As noted above, we meet regularly with our Independent Challenge Group to update on the work we do to support customers that need extra help, and to get feedback on our service. Further feedback is gained through our community engagement team, who are working daily with our network of partners.</p> <p>Finally, we hold the ISO 22458:2022 Consumer Vulnerability Standard, which involves external assessment of our approach to supporting customers who need extra help.</p>	<p>Insight from our quality framework of contacts with customers through our Specialist Support and Contact Centre teams is used to identify improvements and training needs. This feeds into our performance management processes (feedback, coaching, 121s).</p> <p>Monthly review of customer journey insight by Customer Engagement Action Group against process improvement plans or to define new improvement opportunities.</p> <p>Regular external stakeholder reviews of our extra help services and vulnerability strategies (such as CCW and ICG).</p> <p>Comparison of geographic take up of financial and non-financial services against external data sources, such as Welsh Indices of Multiple Deprivation and Indices of Multiple Deprivation (for customers living in England)</p>	<p>Satisfaction of customers registered for extra help services in line with the CCW manifesto goal of 95%</p> <p>Post incident customer satisfaction of 80% satisfied</p> <p>CSAT performance of 9.3 out of 10</p> <p>Maintain ISO 22458:2022 accreditation</p>
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	<p>We recognise the diversity of needs and preferences across our customer base and have built this into the options that we have for communicating with customers, offering:</p> <ul style="list-style-type: none"> •Braille, Large print, coloured paper (for neuro-diverse customers), audio and Easy Read format bills and bills read over the phone. •Website accessibility service (Recite), which includes translation services for 53 languages. This has recently been enhanced by the introduction of the British Sign Language video service. AA+ rating for accessibility •Language line within our contact centre which includes translation services in 240 languages (this is in addition to our inhouse Welsh language team) •Dedicated Welsh language service for all communications and all publications are bi-lingual. <p>Our vulnerability training for front line teams has been accredited by Communication Access UK and we hold the ISO 22458:2022 Consumer Vulnerability Standard.</p> <p>Additionally, all of our written communications are subject to 'Tone of Voice' checks, ensuring that our messages are easily understood, have the right tone, signpost effectively and avoid the use of jargon. We use feedback from customer insight to inform the design of and messaging in our bills and a recent third-party review confirmed that the prominence and acceptability of the key messages met some of the highest standards for accessibility.</p>	<p>Feedback from customers receiving extra help services (Rant and Rave, Speech Analytics, CMEX etc) and insight from our quality framework. We will build in the feedback from the newly established framework for customer research of how incidents are handled.</p> <p>Monthly monitoring sessions of customer complaints and quarterly C, D and B-MeX results</p> <p>Annual customer research of customers receiving extra help to identify areas for improvement.</p> <p>Accessibility monitoring for the website.</p> <p>Regular reviews with partnership network and benchmarking with other utilities to identify good practice and opportunities for improvement.</p>	<p>Maintainance ISO22458 Inclusive Service accreditation</p> <p>Establish a vulnerable customer panel to test satisfaction with our current services and new services that we develop.</p> <p>Use the feedback from the newly introduced customer research into incidents across the sector to improve our communication with customers and acheive >80% satisfaction</p> <p>Customer satisfaction for customers who are on PSR through survey responses in line with the CCW manifesto of 95% satisfaction</p> <p>Maintain the AA+ accessibility rating for our digital services</p>
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	<p>We offer a range of contact channels for all customers including telephone, face to face (either home visit or appointment at one of our offices), letter, webform, email, webchat and social media and have recently introduced a dedicated webchat service for customers contacting our specialist support team (which deals with priority services and financial assistance schemes).</p> <p>Whilst our systems do not allow us to hold customer contact preferences, we will consider how customers have chosen to contact us in the past when we are managing specific incidents to share important information about alternative water supplies. We will also work closely with partners located in the areas impacted by an incident to ensure that messages about an incident, and the provision of alternative water, in particular, are received quickly.</p> <p>We offer third party billing and nominee services as part of our priority services schemes.</p> <p>We have a dedicated account management team for non-household customers who aren't in the contestable retail market who act as a dedicated point of contact for customers. This team will liaise with water reliant non-household sites during incidents.</p>	<p>Feedback from customers receiving extra help services (Rant and Rave, Speech Analytics, CMEX etc) and insight from our quality framework. We will build in the feedback from the newly established framework for customer research of how incidents are handled.</p> <p>Undertake annual customer research with customers receiving extra help to identify areas for improvement.</p> <p>Accessibility monitoring for the website.</p> <p>Comparison of geographic take up of financial and non-financial services against external data sources, such as Welsh Indices of Multiple Deprivation and Indices of Multiple Deprivation (for customers living in England)</p>	<p>Awareness of our priority services and financial assistance scheme (as reported by CCW's Water Matters report)</p> <p>Uplift of 5% on take up for financial support in hard to reach areas</p> <p>Satisfaction of customers registered for priority services in line with CCW manifesto of 95% satisfaction</p> <p>Maintain ISO 22458:2022 accreditation</p>
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	<p>We place a great deal of importance on the feedback from CCW and other external stakeholders about our vulnerability services and opportunities for improvement.</p> <ul style="list-style-type: none"> •We meet CCW every 3 months, with vulnerability being a standing item on the agenda. This includes quarterly reports of priority services take up and key trends. •We provide regular updates to our Independent Challenge Group on the progress of our vulnerability strategy and plans •We meet members of Welsh Government frequently to discuss vulnerability and financial inclusion and attend their Income Maximisation Task and Finish Group and affordable lenders group to share the work we are doing and learn from others. •We hold an annual partner event, attended by Welsh Government, CCW, debt advice sector, local authorities/social landlords and consumer representative groups/charities. •Each month, our customer facing teams attend Teach Talks with consumer representative groups (examples being Age Cymru, MIND, RNIB) who will bring to life the challenges that some customers face and how we can best meet their needs. 	<p>Quarterly reviews of progress against vulnerability strategy, and presenting proposed changes to services/schemes with CCW.</p> <p>Half yearly reviews of progress against vulnerability strategy, and presenting proposed changes to services/schemes with ICG.</p>	<p>All significant changes to service offering around vulnerability to be discussed with CCW and ICG</p> <p>Incorporate lessons from research carried out by CCW and Ofwat into incidents in other companies into our incident response processes</p> <p>Establish a framework for collating feedback from partners to help drive improvements in our priority services and financial assistance schemes..</p>

<p>3.1 Companies should take active steps to identify customers who require extra help who have not yet been identified.</p>	<p>Compliant</p>	<p>Through our community engagement activities, we have built up a network of over 300 partner organisations that we work with on a daily basis to raise awareness of the support that we provide. We have a daily programme of events where our community support team join up with these organisations to provide advice clinics and awareness sessions, as well as training their employees about the support we provide, so that they can refer customers to us or apply on their behalf. This includes doing things such as holding general and individual advice sessions at Job Centre Plus offices, holding multi-partner events (such as our family day at Riverside, Newport in November 2023) to promote our combined support for households that need extra help.</p> <p>We also aim to make it easy for our partners to refer, or apply on behalf of, customers. We developed an online portal (REACH) specifically for our partners to provide us with this information.</p> <p>Our targeted media (social/radio) campaigns highlight the support available for customers and this focuses on where we know there is low uptake but high deprivation</p> <p>Whilst our customers may not yet have presented their vulnerability to us, it is likely that another organisation has this information. Therefore, we place a great deal of importance on sharing information about vulnerability with those organisations. We share information with energy distribution network operators (DNO) across our supply area, health trust renal units, Kidney Care UK and Wales and West Utilities. We also support Welsh Government's JIGSO priority services data sharing platform, being the first utility company to do so.</p> <p>Collaboration with local authorities to reach those customers that are in need of support</p> <p>As a utility company, we have to hold a lot of information about our customers in order to fulfil our licence obligations. We use this information, together with externally available data sources, to understand where there may be an unfulfilled need for the services we offer to customers that need extra help.</p>	<p>Comparison of geographic take up of financial and non-financial services against external data sources, such as Welsh Indices of Multiple Deprivation and Indices of Multiple Deprivation (for customers living in England)</p> <p>Awareness of our priority services and financial assistance scheme</p> <p>Uptake of financial support in targeted areas</p> <p>Satisfaction of customers registered for priority services</p> <p>Number of customers signed up to our Priority Service Register</p>	<p>Awareness of our priority services and financial assistance schemes (as reported through CCW's Water Matters report)</p> <p>Annual Water Resilient Community projects</p> <p>Increased uptake of financial support to support 180,000 customers</p> <p>Colleague competency and confidence following training with a score of 4.5/5 in identifying and responding to vulnerability</p> <p>Expand external data sources to improve our understanding of the extra help needs of underrepresented customer groups and how we need to adapt our current services to accommodate them</p> <p>Explore new data sharing opportunities, including the expansion of data sharing with the energy sector and the introduction of financial data sharing.</p>
<p>3.2 Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.</p>	<p>Compliant</p>	<p>We run dedicated campaigns throughout the year to promote the additional help that we offer to customers that need it. These campaigns, which run under the brand 'Here for you', involve team members and customers in real life case studies of how we have helped out. Our campaigns run across a range of media (social media, bills, radio, partner newsletters, bus hoardings) and target those communities which our data tells us have greatest need for this support. In running these campaigns, we work closely with other organisations that provide extra help to jointly promote our services, making it easier for people to get what they are entitled to more quickly - for example we work closely with Warm Wales, the energy advice charity, to jointly promote our services.</p> <p>Our bills clearly highlight the support available to customers who are facing financial hardship through our assistance schemes</p> <p>We use our website to promote our extra help services, using banners on the home page to raise awareness and signpost customers to pages where more detailed information is provided.</p> <p>As an employer of some 3,500 people across Wales, Herefordshire and Deeside, we have a unique opportunity to promote our services through our operational and capital activities. We have developed information for teams across the company to be able to sign post customers to our support. This includes online materials for office teams, but also cards for field-based teams such as our meter readers.</p> <p>We also use the presence that we have in communities through our investment programme to increase awareness of the help that we provide. In 2017 we launched our first Water Resilient Community project in the Rhondda Fach area, where we were undertaking mains replacement investment. This is a place-based project lasting a minimum of 12 months where we work with residents, businesses, local authorities, health professionals and others to look at how we can support challenges in the area, particularly the impact on customers that need extra help. Since that first project we have run similar schemes in Rhymney/Bargoed, Rhyl and Newport and we are in the process of starting work in Cardigan and Bangor.</p>	<p>Comparison of geographic take up of financial and non-financial services against external data sources, such as Welsh Indices of Multiple Deprivation and Indices of Multiple Deprivation (for customers living in England)</p> <p>Undertake annual customer research with customers receiving extra help to identify areas for improvement.</p> <p>Monthly review of vulnerability strategy progress and take up of extra help services by senior leadership team.</p> <p>Quarterly review of vulnerability strategy progress and take up of extra help services with CCW.</p> <p>Annual board review of vulnerability strategy progress and take up of extra help services.</p>	<p>Awareness of our priority services and financial assistance schemes (as reported through CCW's Water Matters report)</p> <p>Annual Water Resilient Community projects</p> <p>Develop new insight models, with external data sources, to identify the needs of customers and develop strategies to target our marketing and promotion activities in underserved areas.</p> <p>Expand external data sources to improve our understanding of the extra help needs of underrepresented customer groups and how we need to adapt our current services to accommodate them</p> <p>100% new registration letters sent to all PSR customers in line with the new PSR Standard</p>
<p>3.3 Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.</p>	<p>Compliant</p>	<p>All of our customer facing teams are trained to identify the signs of vulnerability and given the skills to respond appropriately in different circumstances. This starts with our induction programme when people join the business and is supplemented with refresher training and updates afterwards.</p> <p>We hold monthly Teach Talks for all customer facing teams delivered by partners that represent different customer groups (examples being Age Cymru, MIND, Samaritans, Parkinsons UK). The purpose of these sessions is to bring to life how we can best deliver our services from a customer perspective, and to help our teams relate and adapt their approach to suit the needs of different customer groups.</p> <p>Employees across the organisation participate in our 'Customer-led Success' training which focuses on developing empathy with customers, and how to develop listening and communication skills to ensure that the extra needs of customers are identified and supported. Alongside this, supporting our vulnerable customers training has been implemented for all customer facing colleagues to identify, support and escalate appropriately.</p> <p>We recognise that customers that have needs that require extra help will often experience financial difficulties. As a result we have combined these two areas to create our Specialist Support team, who will deal with contacts where it is thought that there may be more complex needs. Customers often haven't declared a need in these situations, and therefore the advisors in this team have had further training to recognise, understand and respond appropriately, using the TEXAS model (Thank, Explain, Explicit Consent, Ask, Signpost).</p>	<p>Feedback from all customers, not only those receiving extra help services (Rant and Rave, Speech Analytics, CMEX etc) and insight from our quality framework. We will build in the feedback from the newly established framework for customer research of how incidents are handled.</p> <p>Colleague competency</p>	<p>Maintaining the knowledge within our field teams, particularly those in our supply chain. To overcome this, we will set targets through the contract tendering process and include monitoring of supply chain competency in our future monitoring arrangements</p> <p>Colleague competency and confidence following training with a score of 4.5/5 in identifying and responding to vulnerability</p> <p>100% of all frontline colleagues trained on recognising, supporting and escalating vulnerability and annual refreshes in place</p> <p>Maintain ISO 22458:2022 consumer vulnerability standard</p>
<p>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.</p>	<p>Compliant</p>	<p>We believe that it is important that we make it easy for our customers to get the extra help that they need quickly and, ideally, only have to provide this information once.</p> <p>We have priority services data sharing agreements with a number of parties: National Grid and Scottish Power, ensuring that we have 100% coverage with energy distribution network operators across our supply area; University Hospital Wales and Swansea Bay renal units; Kidney Care UK. We are the first utility company to participate in Welsh Government's priority services data sharing platform, JIGSO and during the Covid pandemic we worked with Welsh Government to establish a temporary priority services register for customers who were instructed to shield.</p> <p>Our operational and GIS systems have been designed to capture water reliant non-household premises (such as schools, hospitals and care homes) that provide services to customers that need extra help to ensure that our operational teams can prioritise support during incidents. As part of this we have partnered with Care Inspectorate Wales to receive monthly information about care homes, including the number of residents.</p>	<p>Undertake annual customer research with customers receiving extra help to identify areas for improvement.</p> <p>Monthly review of vulnerability strategy progress and take up of extra help services by senior leadership team.</p> <p>Quarterly review of vulnerability strategy progress and take up of extra help services with CCW.</p> <p>Annual board review of vulnerability strategy progress and take up of extra help services.</p>	<p>Increase the number of data sharing arrangements for priority services.</p> <p>Introduce financial data sharing to support social tariff applications to support a 5% uplift on hard to reach areas.</p>

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	We hold customers' extra help needs and the services they receive on our Priority Services Register within our customer management system. These records are maintained in accordance with our protocols on information security and data protection and we use role-based access controls to manage who is able to view the information. All of our teams must complete annual refresher training on our obligations under the General Data Protection Regulation.	Audit of affordability and priority services processes. 6 monthly review of data protection compliance (including data breaches)	Maintain ISO 22458:2022 consumer vulnerability standard
4.2 Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	We proactively contact customers on our Priority Services Register at least every two years to ensure that the extra help they are receiving is still required. For any contacts we receive from these customers within that two-year period, our advisors will check that the information that we hold is accurate and that the customer still requires extra help. We will also carry out these checks through the annual reapplication process for our social tariff HelpU. Our operational and GIS systems have been designed to capture water reliant non-household premises (such as schools, hospitals and care homes) that provide services to customers that need extra help to ensure that our operational teams can prioritise support during incidents. As part of this we have partnered with Care Inspectorate Wales to receive monthly information about care homes, including the number of residents.	Monthly review of Priority Service attempted and actual contacts (Senior management, Executive and Board)	Attempt contact with 90% of priority service customers every 2 years to confirm their ongoing requirement for extra help. Actual contact with 35% of priority service customers every 2 years to confirm their ongoing requirement for extra help.
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	The Water and Energy sectors agreed common needs codes to support data sharing between companies and we have adopted these codes within our Priority Services Register. We use role-based access controls to ensure that teams that need to be able to know when customers are registered for extra help. This will vary according to the circumstances. To provide additional protections for customers, we record the needs code at a property level and do not identify who in the property needs the extra help.	Annual customer research of customers receiving extra help to identify areas for improvement. Monthly review of vulnerability strategy progress and take up of extra help services by senior leadership team. Quarterly review of vulnerability strategy progress and take up of extra help services with CCW. Annual board review of vulnerability strategy progress and take up of extra help services.	Increase the number of data sharing arrangements for priority services Introduce financial data sharing to support social tariff applications by expanding partners (local authority etc).
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	In our Privacy Notice, located on our website, we explain: •Our legal basis for processing personal data, including sharing data; •What personal data we will collect and what we will use it for; •Personal data we will collect from others and what we will use it for; •Information we will share with others about you and why •Where we store personal data and how we keep it safe •The choices that people have and how to contact us if they have concerns. We explain this to customers when they are applying for our priority services. In May 2024 we carried out customer research with customers who need extra help to find out how they feel about the use of their data. This found that most customers are happy for their personal information being used to improve the support they receive.	Feedback from all customers, not only those receiving extra help services (Rant and Rave, Speech Analytics, CMEX etc) and insight from our quality framework. Undertake annual customer research with customers receiving extra help to identify areas for improvement. Annual review of Privacy Notice and training material as part of Annual Billing project. Comply with the PSR standard by sending letters to all new registrants outlining the service they should expect and how we share data	Establish a vulnerable customer panel to test satisfaction with our current services and new services that we develop.
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	In 2018, we launched our vulnerability strategy for AMP7, entitled 'Supporting our customers - working at the heart of our community'. We have achieved a great deal in that time: 183,000 (12.5%) of households registered for priority services; 145,000 households receiving financial assistance; priority services data sharing in place with energy DNOs, public health bodies and Welsh Government; established a specialist support and community outreach team to maximise the reach of these services; expanded our network to include over 300 groups and organisations which represent customers needing extra help. However, we have recognised that it is time to take stock and define the priorities for the next 5 years and over the last 12 months, we have worked with partners, regulators, Welsh Government, customers and customer representative groups to do this. Today we are publishing our final strategy which includes the findings of that review and our high-level priorities through to 2030, how we meet Ofwat's minimum expectations and what we will measure to ensure that our strategy is on track.	Annual board review of our progress against the commitments in our Vulnerability Strategy	Annual board review of our progress against the commitments in our Vulnerability Strategy
5.2 Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	In developing this strategy, we have consulted with customers and our partners to understand how impactful our priority services (including our communications and incident support) and financial assistance schemes are, where improvements are needed and whether there are new services that we can offer. Alongside this, we have also considered a range of external studies and data sources, which include Welsh Government research into digital inclusion, mental health provision and disabilities, Joseph Rowntree Foundation, Bevan Foundation and Age Cymru. The key messages from these sources for this strategy are: •Customers and their representatives rate our priority services and financial assistance schemes highly. •Our outreach and community activities are vital in supporting customer that won't engage with us directly. •We need to do more to raise awareness of our support, particularly making use of our partners to act as intermediaries. •Looking out to AMP8, we need to give careful consideration to the impact of smart meters on lower income households. This has been built into our 4 strategy themes – data, accessible services, training & awareness and communities & partnership – and delivery plans through to 2030. We will review these sources annually to ensure that we identify any new trends that we need to incorporate. It was through this approach that we identified the need to provide assistance for working households and worked with two Citizens Advice offices to pilot our new Cymuned scheme to support those with negative budgets. We have incorporated external regional data sources such as Welsh Indices of Multiple Deprivation, state benefits and Universal Credit into our operational dashboards and match against our priority services and financial assistance scheme data. This helps us understand where we may have customers that are not receiving the support that they need and therefore target our community and marketing activities appropriately.	Undertake annual customer research with customers to understand extra help needs and any unfilled requirement. Annual formal review of external data sources and research (including but not limited to Welsh Government, Ofwat, CCW, Joseph Roundtree Foundation, Bevan Foundation, Citizens Advice) against internal data sets (priority services, social tariffs, debt levels) to assess the impact of our services and consider any needs we aren't addressing. Regular external stakeholder reviews of our extra help services and vulnerability strategies (such as CCW and ICG). Comparison of geographic take up of financial and non-financial services against external data sources, such as Welsh Indices of Multiple Deprivation and Indices of Multiple Deprivation (for customers living in England)	Host an annual event to share best practice with partners, stakeholders and other utility companies Expand external data sources to improve our understanding of the extra help needs of underrepresented customer groups and how we need to adapt our current services to accommodate them. Develop community partnership 'clusters' to help target support in areas