



ESP VULNERABILITY STRATEGY



CONTENTS

Introduction	3
Who is this Strategy for?	3
Our Culture and Approach	3
Understanding our customers' needs	5
Additional Help and Support	5
How we handle and use your data	6
What else we are doing	6
How to find out more	7
Ofwat Vulnerability Guidance	8



ESP Vulnerability Strategy

Introduction

ESP Utilities Group (“ESP”) is an operator of gas, electricity and water networks serving over one million connections right across the UK.

ESP is a founding member of the Independent Networks Association and played a key role in developing its Customer Commitment, which mirrors our values.

ESP Water (“ESPW”) is part of the ESP group and received our license and first appointment in 2022 to provide water and wastewater services to new developments across England and Wales.

ESP has operated as a statutory licenced IDNO and IGT for over 25 years. We have over 1 million utility connections mainly to residential electricity and gas customers. A key part of our operations in these markets has been the implementation of systems and processes to ensure our customers receive an excellent level of service. This includes an established Priority Services Register (PSR) which spans across our multi-utility services; we are constantly seeking to improve and to ensure we capture all our vulnerable customers’ needs and can provide specific support in the event of a loss of supply or other incident impacting the service. A link to our PSR webpage is [here](#).

This document outlines our strategy to provide and improve on the help we offer for those who need extra support.

Who is this Strategy for?

We define a vulnerable customer as someone who needs extra help.

Our Vulnerability Strategy Promise

We will support all those that need extra help by understanding their needs, delivering our promises and following our Think customer principles.

Our strategy is in line with Ofwat guidelines, and we have set out in the table annexed to this strategy, how we comply with their minimum requirements:

Our Culture and Approach

In early 2024 – we launched our Think Customer Campaign which focusses on the importance of having a customer centric mindset. This project is designed to empower our employees, partners, and contractors to always consider the customers perspective. We aim to develop a mindset and culture which ensures everyone we deal with gets the best service for their specific needs.

We recognise that in order to deliver the high level of service our customers expect, we must develop a culture of continuous improvement and empower our staff to provide the necessary support at the time and in the way it is most needed. This is embodied in the training we provide for our staff which is regularly refreshed and takes account of the best practices that we identify from monitoring services in our own and similar sectors. It is also informed by engagement with consumer groups

and feedback from experiences and incidents. We aligned our Think Customer campaign to our ESP Values, and developed specific commitments against each of these to explain clearly what this means for customers.



<p style="text-align: center;">Excellence</p> <p style="text-align: center;">WE ARE EXPERTS</p> <p style="text-align: center;">We will always...</p> <p style="text-align: center;">Train our people to the highest standards</p> <p style="text-align: center;">Empower our people to do what is best for the customer</p> <p style="text-align: center;">Encourage a Can Do mindset</p> <p style="text-align: center;">Work on improving our systems & processes</p>	<p style="text-align: center;">Transparent</p> <p style="text-align: center;">WE COMMUNICATE OPENLY & HONESTLY</p> <p style="text-align: center;">We will always...</p> <p style="text-align: center;">Be positive & professional and avoid jargon</p> <p style="text-align: center;">Be honest & upfront about the situation & won't hide behind email</p> <p style="text-align: center;">Explain our processes clearly with regular updates</p> <p style="text-align: center;">Guide the customer to achieve a shared outcome</p>	<p style="text-align: center;">Ambitious</p> <p style="text-align: center;">WE ENJOY WHAT WE DO</p> <p style="text-align: center;">We will always...</p> <p style="text-align: center;">Be innovative in our thinking</p> <p style="text-align: center;">Lead by example and BE the example</p> <p style="text-align: center;">Take pride in our service</p> <p style="text-align: center;">Keep a positive mindset</p>
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<p style="text-align: center;">Respectful</p> <p style="text-align: center;">WE ARE ALL RESPONSIBLE</p> <p style="text-align: center;">We will always...</p> <p style="text-align: center;">Follow through & follow up</p> <p style="text-align: center;">Put ourselves in the customer's shoes</p> <p style="text-align: center;">Provide service with a smile</p> <p style="text-align: center;">Live our shared values</p>	<p style="text-align: center;">Collaborate</p> <p style="text-align: center;">WE REALLY CARE</p> <p style="text-align: center;">We will always...</p> <p style="text-align: center;">Come together to keep our promises</p> <p style="text-align: center;">Co-operate with each other</p> <p style="text-align: center;">Hold each other to account</p> <p style="text-align: center;">Work together to get the best outcome, aiming to get it right first time</p> <p style="text-align: center;">Actively listen to understand our customers' needs</p>
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Understanding our customers' needs

We know that customers have different requirements and to offer the right services to support a wide range of needs we must understand our customer base.

ESP has a Priority Services Register (PSR) which we encourage customers needing extra support to sign up to. This is available on our website [Help for vulnerable customers : ESP Utilities Group LTD \(espug.com\)](#) and registration can also be completed over the phone by calling 0330 123 4201 or 01375 587 500.

As part of our Welcome Pack for new customers we provide information on our services. This includes information on our PSR, how to sign up and the benefits it can bring. We also provide contact information so that customers can let us know of any specific needs or support requirements they have.

We always strive to provide information in plain English and avoid the use of jargon so that customers can easily understand what help is available and how to access it. All our leaflets and website pages are regularly reviewed to make sure that the information provided remains relevant and up to date.

ESP contacts all our customers regularly, either by email or text message, or by writing to their home address, to make sure they are aware of the extra services we can provide.

ESP Water is a young organisation with a currently very small customer population; less than 500 registered customers as of June 2024, all of whom have moved into their new homes in the past 12 months.

We recognise that this currently small customer base may not be representative of the needs of a larger population and are committed to engaging with consumer groups such as the Consumer Council for Water (CCW), national charities and local providers, to understand what additional support and services we can offer which are likely to benefit our customers as our networks grow.

We are developing follow up surveys and engagements plans for all customers post-incidents to learn lessons from lived experiences and this will include a focus on how we can improve our support for any specific needs we identify.

Additional Help and Support

We have arrangements in place to provide extra help to customers who need it which includes:

- Offering tailored communications including alternative formats such as large print, braille, or additional languages.
- Offering customers the security of having a password for any ESP staff or contractors when visiting their homes.
- Making contacting registered customers a priority during any planned or unplanned outages or incidents impacting their supply.
- Providing priority deliveries of bottled water in the event of a loss of supply, including doorstep delivery.
- Making arrangement to offer third party billing through a trusted friend or family member.



In our desire to continually improve our service we have set up a Vulnerability Forum within the business which has contributors from multiple disciplines to ensure a wide range of customer interactions are considered including billing, complaints and operational faults. This group is responsible for reviewing how incidents have been managed, taking account of customer feedback, and making recommendations for improvements. Activities and actions taken from these learnings are captured in a cross functional action plan and progress on delivery is monitored at senior management level.

Given the small number of customers we currently have to gather feedback from, once numbers increase we plan to also engage with consumer groups to understand what additional services we can implement to improve our service.

How we handle and use your data

Everyone has different preferences for how they get in touch with us, and we are happy to hear from customers through a number of channels; email; phone; letter; social media; or directly through our website.

We know that having to tell multiple companies about specific needs and any extra help they require, places an additional burden on customers, and we are collaborating with others in the wider utility sector; Incumbent network operators; Suppliers and Regulators; to deliver a “tell us once” service. This will allow companies to share information about additional needs and allow a more tailored service to be provided for those who require extra help.

We are also mindful of the need to ensure that any information shared with us is handled appropriately and respectfully. We provide regular refresher training for all our staff on handling sensitive data and have robust processes on the management, security, and retention of all personal information.

Customers may be in contact with members of our team from across the business and we are developing an automated mechanism to ensure that any extra needs are flagged up and shared with the appropriate teams so we can take a proactive approach when engaging with those customers.

What else we are doing

This strategy is at draft stage, and we will continue to work with stakeholders to develop the strategy and the implementation plan over the next twelve months.

This includes:

- Sharing this Vulnerability strategy with stakeholders both internally and externally, ensuring they understand our Th!nk Customer values.
- Monitoring through our Vulnerability Forum, ensuring we have regular review and feedback and capture learnings from any lived experiences.
- Creating a delivery plan and decision tree for each promise for those on our PSR, ensuring appropriate support during incidents.
- Undertaking external engagement with relevant charities, support groups, and consumer bodies to help inform ongoing improvements in line with best practice.



- Developing and delivering a vulnerable customer training plan for our team, so that we can provide the right support to our customers.
- Investigating appropriate standards or certifications to provide third party assurance of our compliance with best practice.
- Identifying and capturing appropriate metrics so we can measure our performance against our Th!nk Customer commitments and objectives.

How to find out more

For further information or to provide feedback on the service we provide, you can visit our website at [Help for vulnerable customers : ESP Utilities Group LTD \(espug.com\)](https://www.espug.com) or give us a call on 0330 123 4201 or 01375 587 500.

Table 1.0 Ofwat Vulnerability guidance

[Service for all vulnerability guidance - Ofwat](#)

Ofwat Minimum Expectation	What does that mean at ESP?
Objective 1 – High standards of service and support	
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.	ESP operates a Priority Services Register (PSR), which helps us prioritise support during incidents. We highlight this service when customers first move into their property and regularly remind customer this help is available.
1.2: Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	We always use simple language in our documents and on our website and regularly review the content. Alternative options such as Braille, large print and translations are also available on request.
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.	As part of our action plan, we will be engaging with external agencies to ensure any learning is fed into continuously improving our services.
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.	The Quarterly Vulnerability forum includes a review of our data and satisfaction surveys. We use a traffic light system to check how well we have done during incidents
Objective 2 – Inclusive by design	
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.	As part of our action plan, we will be engaging with external agencies to ensure our offering is diverse and includes recommendations from best practice.
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.	At ESP we take a multi-channel approach and our developing our capabilities to ensure our customers have a choice in the way they can contact us. Third party billing options are available to our customers.
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.	We will engage with CCW and seek feedback on our vulnerability strategy as we develop it and consider any changes in the future.
Objective 3 – Identifying customers	
3.1: Companies should take active steps to identify customers who require extra help who have not yet been identified.	We provide details of our services to all new customers as they move into their homes on our networks, including how

	they can find out more about what is available. Customers are made aware on our website and in customer documents of options to assist with payment and how to register for additional services.
3.2: Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	We have a regular contact programme for customers on our PSR to make sure they still want to be registered, and we have captured their needs correctly.
3.3: Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	As part of our Vulnerability Strategy, we are developing a training plan to ensure we are delivering the most up to date and effective training for our staff.
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.	As a multi utility company we already ask our customers if they would like to go on a cross fuel PSR, but we are looking into partnering with other organisations to make this as easy as possible for our customers. We are also working with industry to develop a broader “tell us once” service across electricity, gas and water companies.
Objective 4 - Recording needs	
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.	We already have a system in place to safely store information for our Gas and Electricity customers and this will be extended to Water.
4.2: Companies’ records should be reviewed regularly to ensure they are up to date.	Our customer contact programme which engages regularly with customers offers the opportunity to update details or join the PSR.
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.	We are looking at several options to ensure all customers get the best service from us by providing their details. Our website site already covers all they need to know for all the utilities and as multi utility teams they can easily find advice about any of our services.
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.	We provide clear information to customers on how we use their data and the reason we are holding it. We have a responsibility under GDPR to keep customer data safe and we test this with third party auditors. We have robust procedures in place for how data is stored and handled, and training on customers rights to access and update

	their data is provided regularly to all staff.
Objective 5 – Vulnerability strategies	
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.	We have developed our vulnerability strategy over the last 6 months, and our action plan to implement further improvements will be delivered by June 2025.
5.2: Companies should take steps to understand the likely underlying requirements for extra help in their areas.	We will continue to engage with customers and consumer bodies, and charities to better understand the diverse needs of our customers.