

Water Company ESP Water Limited

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	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 also when they contact us in relation to their bills and all correspondence remind customer this help is available.	We operate a lessons learned process after every event and review how we have met the needs of those on our PSR register.	We have an established Gas and Electricity PSR and our Water PSR has been incorporated into the same system as part of our multi-utility approach	Our Water PSR has been merged with our Multi-Utility PSR and is accessible on our Dynamics system. We get regular reports from our third party billing provider to ensure this is happening.
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Compliant	We 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. We have also published a separate document "How we can help you" to make it simpler for our customers to understand what help is available. In addition we have agreed our emergency toolbox for helping customers so that our staff can tell our customers what is available when they call.	We ask independent staff members to review these documents to ensure they are easy to read and regularly review our website content to ensure it remains appropriate and up to date. We have not had any requests for alternative options yet. We are engaging with Queen Elizabeth Foundation (QEF) for disabled people to help us review the accessibility of our website.	Sometimes our customers assume the incumbent water company is their company so we have to work harder to make sure we are known to our customers.	Our vulnerability toolbox has been developed and shared with our operational teams.
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	As part of our action plan since the draft, we have reviewed information provided by external agencies to ensure any learning is fed into continuously improving our services.	We will regularly review the services that other companies offer to ensure we learn and improve our service. We also keep abreast of the information and suggestions made by charities and support groups.	Working nationally can be difficult for NAVs as there are many stakeholders. Learning from others is more efficient for small water companies.	As at June 2025 we have developed and implemented our stakeholder engagement plan.
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	The Quarterly Vulnerability Steering Group includes a review of our data and satisfaction surveys. We use a traffic light system to check how well we have done during incidents	Our surveys will help us monitor our activities and these quarterly meetings are in place.	Getting the customers to give us information on request may be difficult	This will be reviewed again by end of December 2025.
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 part of our final action plan, we have reviewed information from external agencies to ensure our offering is diverse and includes recommendations from best practice. We have also worked with QEF charity to help us learn and develop our offering.	We will regularly review the services that other companies offer to ensure we learn and improve our service.	Working nationally means local mapping is not as relevant for NAVs as there are many stakeholders. Learning from others and developing partnerships with consumer bodies and charities is a more efficient approach for small water companies.	We have a stakeholder engagement plan that has been developed and implemented by June 2025.
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	At ESP we take a multi-channel approach and have developed 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.	Our surveys will help us monitor our activities and any appropriate new channels of communication we can offer. We are also working with our partner charity to test our methods.	Keeping up with the pace of change with regards to communication channels.	Many of our customers use social media and we are working on a way to incorporate this into our offering in the future.
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 have engaged with CCW and sought feedback on our vulnerability strategy and will consider any changes they suggest in the future.	We will continue to seek to engage with CCW on our Strategy as well as other consumer groups.	Getting time with CCW has been a challenge and we are seeking to set up regular meetings to discuss our approach.	Regular meetings with CCW.
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	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 help 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. We have also developed our information on social tariffs.	Monitoring numbers of PSR customers who register with us via our third party billing contractor.	Raising awareness with customers of our role and how we can support them.	We will ensure that all customers when registering with us following moving into their new home are made aware of our PSR and asked if they need "extra help".
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Compliant	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.	At least annual engagement with customers to signpost the PSR and allow them to update their registration details,	Raising awareness with customers of our role and how we can support them.	We will send a reminder to all our customers annually to check whether they are eligible and would like to join the PSR or whether their circumstances have changed
3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	Compliant	As part of our Vulnerability Strategy, we have developed a training plan to ensure we are delivering the most up to date and effective training for our staff.	This training will be delivered and during the regular lessons learned review on incidents we will assess how effective the training has been.	Training will be proportionate to the size of our vulnerable consumer base.	Training plan is in place

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	As a multi utility company we already ask our customers if they would like to go on a cross fuel PSR, but we are supporting regulators in developing multi-utility PSR through the Independent Networks Association. We are also working with industry to develop a broader “tell us once” service across electricity, gas and water companies.	We will check regularly with the customers on the PSR to ensure our approach is working.	Government support would be advantageous in this matter so that all utilities and companies can get onboard.	None
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 already have a system in place to safely store information for our Gas and Electricity customers and this has been extended to Water. We have also introduced a new CRM (Customer Relationship Management) system for storing information about our customers.	Data checks are made on the IT system now that Water is incorporated into the wider system. We also hold the ISO27001 accreditation for Information Security Management Systems.	None	Maintain ISO27001 accreditation
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	Our customer contact programme which engages regularly with customers offers the opportunity to update details or join the PSR.	The regular contact we have to update the PSR is the monitoring tool for this.	Some customers may be transient PSR customers and we need to have a way of updating our records accordingly in an incident.	We will send a reminder to all our customers annually to check whether they are eligible and would like to join the PSR or whether their circumstances have changed
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	We have looked at several options to ensure all customers get the best service from us by providing their details. This has helped us develop our website which 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.	We will check regularly with the customers on the PSR to ensure our approach is working.	None	None
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 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.	We are audited externally on our compliance to the GDPR Regulations and the handling of PSR data is part of this audit. We also hold the ISO27001 accreditation for Information Security Management Systems.	None	Maintain ISO27001 accreditation
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 have developed our vulnerability strategy over the last 18 months, and our action plan to implement further improvements will be delivered in this strategy published in June 2025.	Adherence to our strategy will be reviewed at each Vulnerability Forum.	None	Annual review following submission of final strategy.
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	We will continue to engage with customers and consumer bodies, and charities to better understand the diverse needs of our customers.	This will be built over time and as we have more consumers moving in.	As a NAV operating across the whole of England & Wales it is challenging to understand demographics over the whole country.	By Dec 2025 we will undertake a review of our registered customers and those on the PSR to look for patterns and increase our learning about our customer base.