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Vulnerability Strategy

January 2026





INTRODUCTION

ESP Utilities Group (“ESP”) is an operator of gas, electricity, water, waste water and heat 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.

This document details our strategy to provide and enhance the assistance we offer to those requiring additional support. We initially published this in June 2024, and have now updated the strategy to further outline our work in supporting individuals in need of extra help.

Priority Services Register (PSR)

ESP has an established Priority Services Register (PSR) which spans across our multi-utility services, and we are constantly seeking to improve 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.

[Click here to see our PSR webpage](#)



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WHO IS THIS STRATEGY FOR?

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

Our strategy is in line with Ofwat and Ofgem guidelines and their 'Service for All' expectations.



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Our Vulnerability Strategy Promise:

We will support all those that need extra help by understanding their needs, delivering our promises and following our Th!nk Customer principles.



OUR CULTURE & APPROACH

We have launched a Th!nk 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 regulators, consumer groups and learnings taken from experiences and incidents.



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We aligned our Th!nk Customer campaign to our ESP Values and have developed specific commitments against each of these to explain clearly what this means for customers.



Be Excellent



Be Transparent



Be Respectful



Be Ambitious



Be Collaborative

Our Th!nk Customer campaign is constantly evolving.

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.

We recognise that there are different drivers of vulnerability including transient vulnerability and other dynamic factors which affect people's need for support such as weather conditions. We have included some examples of vulnerabilities on the following pages. This is not an exhaustive list, but helps us assess the needs of our customers should an incident occur.

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UNDERSTANDING OUR CUSTOMERS' NEEDS

Our Customer Service teams have received training, and we have also reviewed the recommendations suggested by representative charities to ensure we provide the right tools to support these vulnerable groups.

As part of our Water and Heat Welcome Pack, we provide customers with 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.



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Types of vulnerabilities:

Are deaf or have difficulty hearing

Have young children below the age of five*

Have mental health conditions

Need dialysis

Have physical disabilities

Have dementia

Have chronic or serious illness

Are of pensionable age over 65

Are unable to answer the door

Have experienced life changes such as bereavement or separation*

Are recovering following hospital treatment*

Have restricted hand movement

Are blind or partially sighted

Have developmental conditions

Are unable to communicate in English

Are a young adult (below 18) who is paying the bills*

* These situations may mean extra help is needed on a temporary basis



To support those that need extra help we have a multi-utility Priority Services Register (PSR).



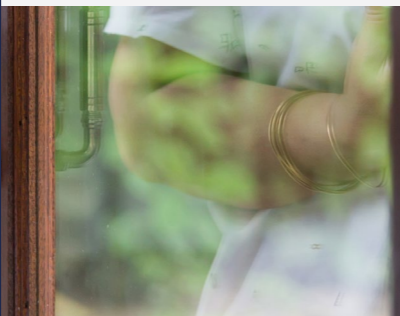
ESP's PSR is available on our website under the heading "**Help for Vulnerable Customers**": ESP Utilities Group LTD (espug.com)



Registration can also be completed over the phone by calling **0330 123 4201** (water) or **01372 587 500** (mainline).



We provide a freephone number for water billing enquiries or those who need extra support and have difficulty paying their water bills: **0808 129 5790**



IDENTIFYING CUSTOMERS

ESP Water and Heat, our two consumer utilities have less than 10,000 registered customers.

We recognise that this currently small customer base may not be representative of the needs of a larger population, and we sought information from 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.

Following discussions with both Ofwat and these bodies, we have set targets around ensuring information about the PSR is available to our customers. These internal targets are included on the following pages.

In addition, and to grow the understanding of our customer base, we have developed 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 customers with specific needs that we identify.



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PSR Commitments are as follows:



Commitment

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

How is it monitored?

Reports from our billing service provider and spot audits

By when?

Monthly



Commitment

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

How is it monitored?

Communications will be sent to all our registered customers via their preferred method

By when?

Annually



ADDITIONAL HELP & SUPPORT

In our desire to continually improve our service we have set up a Vulnerability Steering Group 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, we have also obtained information from consumer groups and charities to understand what additional services we can implement to improve our service. These include Citizens Advice, National Autistic Society, Carers UK, Mind and Macmillan.

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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.



Making contacting registered customers a priority during any planned or unplanned outages or incidents impacting their supply.



Offering customers the security of having a password for any ESP staff or contractors when visiting their homes.



Providing priority deliveries of bottled water in the event of a loss of water supply, including doorstep delivery.



Making arrangements to offer third party billing through a trusted friend or family member.



Offering social tariffs and support if people have difficulty paying their bills.



HOW WE HANDLE & 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; X; 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 industry; 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 supporting work with Defra on a national social tariff to avoid a postcode lottery of financial support occurring across England.

We are 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. ESP is certified to ISO 27001, the globally recognised standard for Information Security Management Systems.

Customers may be in contact with members of our team from across the business and we have introduced a new Customer Relationship Management system which ensures 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.



“ We are collaborating to deliver a ‘tell us once’ service.”

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WHAT ELSE WE ARE DOING

This strategy has been in place for a year; we continue to work with stakeholders to develop it further and our ongoing strategy plan has short, medium, and long-term goals.

This includes:

- 1 Sharing this Vulnerability Strategy with stakeholders both internally and externally, ensuring they understand our Th!nk Customer values.
- 2 Monitoring through our quarterly Vulnerability Steering Group, ensuring we have regular review and feedback and capture learnings from any lived experiences.
- 3 Embedding the delivery plans and decision trees for each promise for those on our PSR, ensuring appropriate support during incidents.
- 4 Building on our external engagement with relevant charities, support groups, and consumer bodies to help inform ongoing improvements.
- 5 Continuing to deliver a vulnerable customer training plan for our team, so that we can provide the right support to our customers.
- 6 Investigating appropriate standards or certifications to provide third party assurance of our compliance with best practice.
- 7 Identifying and capturing appropriate metrics so we can measure our performance against our Th!nk Customer commitments and objectives

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We submitted our draft Vulnerability Strategy in June 2024 and following feedback, we have updated our strategy to include more detail on the following:

1. Included PSR commitments.
2. Included Charity and Support Group reviews.
3. Included more detail on types of vulnerable customers.
4. Highlighted our work associated with our decision tree and tool box for vulnerable customers.
5. Incorporated Ofwat feedback and updated guidance into our strategy.

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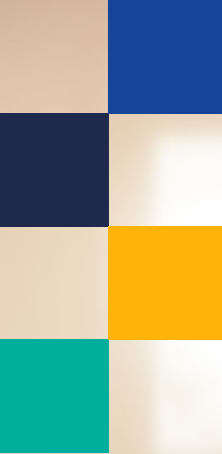
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For further information or to provide feedback on the service we provide, you can visit our website at Help for Vulnerable Customers:

espug.com | 01372 587 500

