Independent Water Networks

Vulnerable Customer and Priority Institutes

What you can expect from IWNL

Rev 02 – ISSUED JULY 2026

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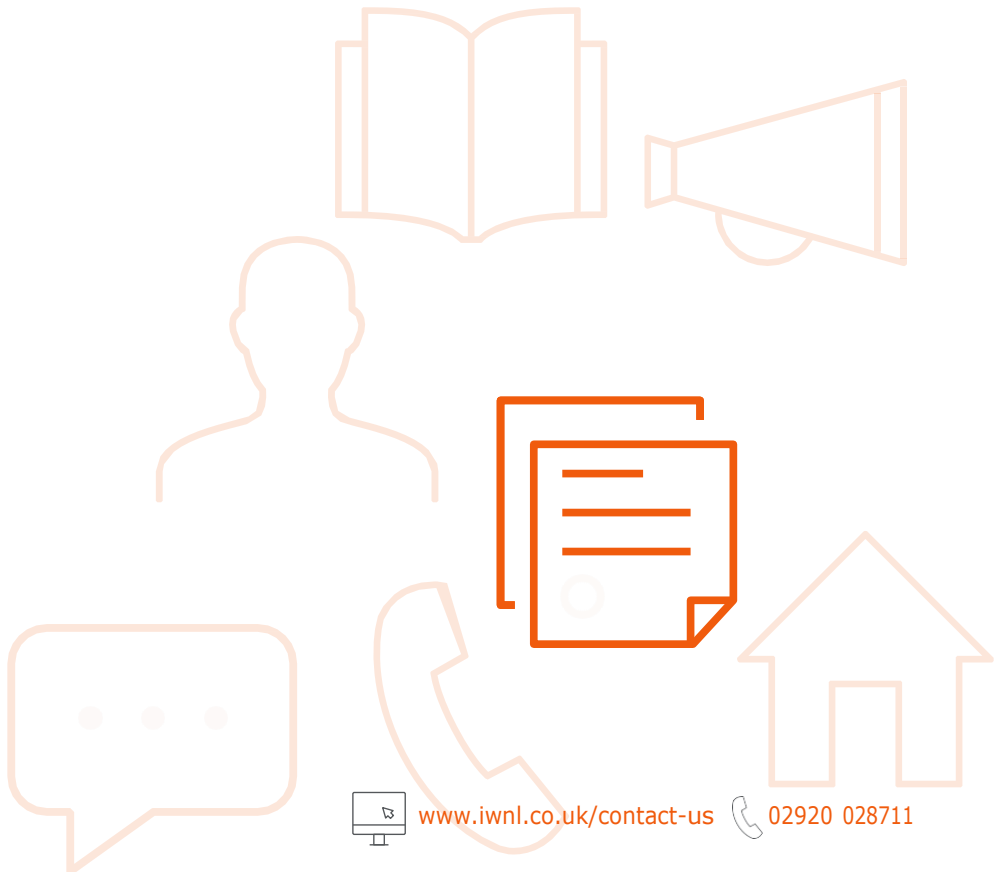
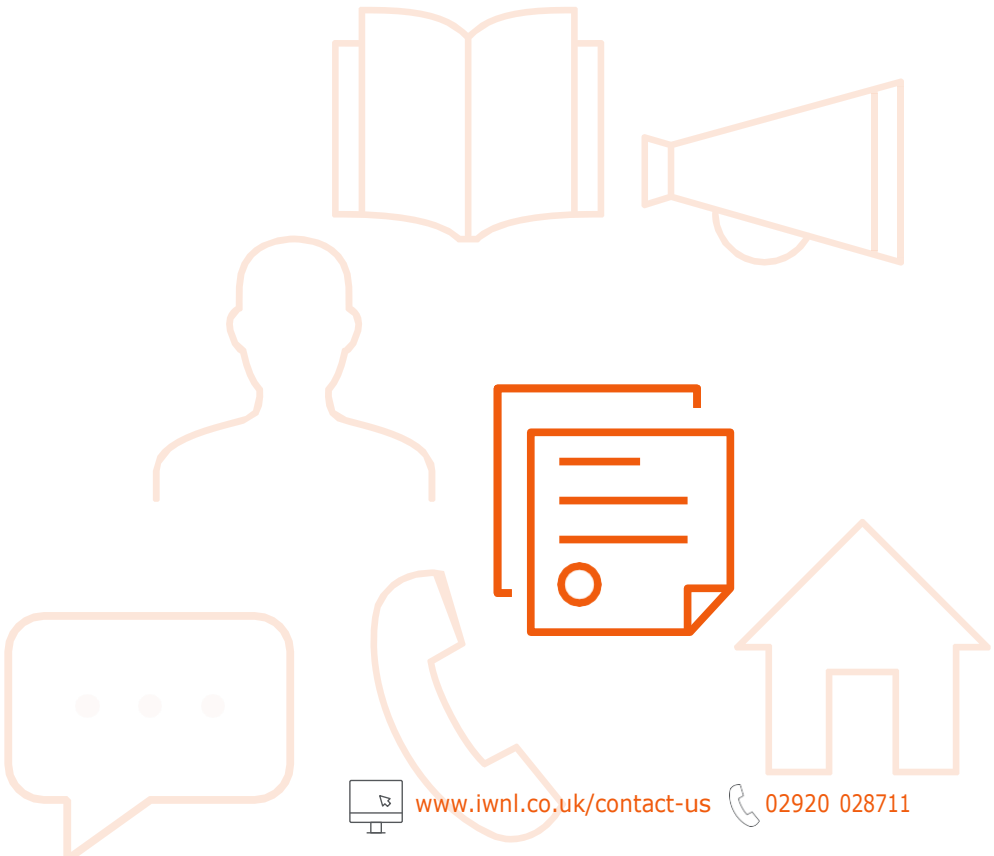


1.0 Background

In response to changes introduced in the water industry to create competition in the non-household customer market, we need to clearly understand which premises are occupied by sensitive customers so we can respond appropriately when delivering planned activities and dealing with reactive situations and unplanned changes to services.

Retailers are responsible for notifying us via the market operator when their customers fall within our definition.



2.0 Aim

This policy identifies which types of Non-Household Customers IWNL Wholesale consider fall within the definition of Sensitive Customers and for which Eligible Premises it may wish to establish as vulnerable.

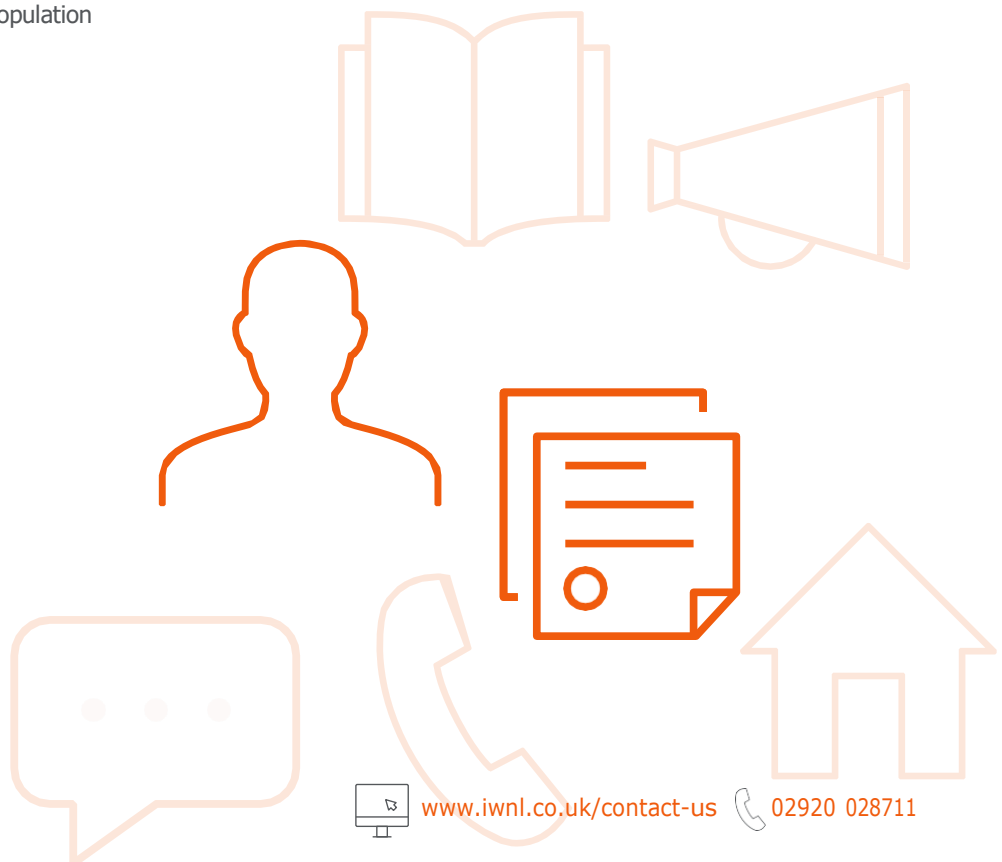
The aims of the policy are:

- to ensure a consistent approach is followed within IWNL Wholesale operational area;
- to provide Retailers and Non-Household Customers with our guidelines that shall always be complied with;

This policy sets out the definition of Sensitive Non-Household Customers to be followed by IWNL Wholesale and in accordance with the Market Codes and SEMD, and describes the planning Independent Water Networks (IWNL) has put into place for each type of vulnerable sector, to ensure the provision of essential water supply or sewerage services at all times, including in the event of a civil emergency or any event threatening national security.

Accordingly, set out below are the key SEMD provisions, Open Water guidance, and definitions, followed by details on how IWNL identifies and prioritises arrangements for the following vulnerable customers and other vulnerable sectors of the population:

A. Vulnerable customers on IWNL's Priority Services Register (PSR) (including the sick, the elderly and the disabled);
B. Hospitals
C. Nursing Homes
D. Schools
E. Prisons
F. Farms and abattoirs (with commercial livestock)
G. Other vulnerable sectors of the population



3.0 SEMD & Open Water Requirements

This Section outlines:

1. The paragraph within the SEMD in reference to provisions for vulnerable sector customers;
2. Open Water's guidance on sensitive and vulnerable customers; and
3. Definitions.

3.1 SEMD

Paragraph 1(2)(c)
This provision states that plans for essential water supply must give priority to the domestic needs of the sick, the elderly, the disabled, hospitals, schools and other vulnerable sectors of the population.

Guidance notes on this provision state that the undertaker's plans should take into account the possible higher than average quantities of water needed for those referred to in this paragraph, such as those with kidney dialysis machines at home.

Some water undertakers may have difficulties in identifying details about people in the vulnerable sectors. However, they should make plans and arrangements with other bodies, such as local authorities and health authorities, to secure, as far as possible, information available to these bodies about vulnerable people.

- IWNL has a Priority Services Register to identify and capture vulnerable customers.

Paragraph 1(2)(d)
This provision, whilst not addressing the needs of vulnerable sectors, suggests that each water undertaker needs to look at its own area to identify the nature of non-domestic users, in particular livestock and essential food industries and give due regard to their requirements. What this means in practice is that the needs of domestic vulnerable customers will be prioritised over non-domestic users; but efforts will be made to assist non-domestic

3.2 Open Water

In April 2017 market separation within the Water Industry will take place. This will see the water providers become the wholesalers of the water and any number of retailers will then compete for non-domestic customers business.

As part of this, obligations around sensitive or vulnerable customers still remain and it will be the responsibility of the Wholesaler to publish guidance as to which types of Non- domestic customers it considers to fall within the definition of Sensitive Customer and shall respond to any query which the Retailer raises with it about the application of that guidance.

users.

4.0 Identifying Vulnerable and Priority Users

Under IWNL's current definitions: -

- Vulnerable customers are those domestic customers who are registered on our Priority Service Register.
- Priority customers are defined as groupings of individual vulnerable customers, such as prisoners, patients and school children in a non-domestic setting.

4.1 Vulnerabilities Register

Vulnerable customer information is obtained in several ways. Customers can self-register; this can be done either on IWNL's website or by calling the contact center and registering over the phone.

Once the customer has provided permission to be included on the Vulnerabilities Register, their information is added to our records. At the customer's request, this information can be removed at any time.

4.2 Hospitals & Prisons

Hospital and Prisons information has been captured based on pre-determined guidance as set out in Section 5.

4.3 Nursing Homes

Nursing homes are identified using the Care Quality Commission's website. The Care Quality Commission is the independent regulator of health and adult social care in England. The website can be used to search for any given health or social care provider in any given area and generates a downloadable link to the data.

4.4 Schools

Schools are identified during an event by using the Department of Education's website. This website provides information on all 'compulsory higher and further education' establishments and allows IWNL to identify those potentially affected by area.

5.0 Site Specific Arrangements

This section details the different types of institutions IWNL classify as priority customers in accordance with SEMD (paragraph 1 (2) (d). For each institution, a definition is provided followed by IWNL tailored response based on the Risk Matrix outcome in section 3.

5.1 Prisons

Definition:
A place of confinement, especially for lawbreakers; specifically: an institution (as one under state jurisdiction) for the confinement of persons convicted of serious crimes

- Users defined as 'vulnerable' due to captive status – are unable to provide themselves with alternative supplies during an I2S or WQ event – this includes difficulty with boiling and collecting water from a source.
- Institutes are unable to close or evacuate due to high risks associated with this and lack of readily available alternative accommodation and risks posed by inmates.
- Social unrest – interruption to basic 'human rights' may cause riots or associated anti-social behavior.

IWNL Response / Provisions:
IWNL will produce a site-specific Prison Information Pack that includes the following information:

- Major risks and vulnerabilities for the individual facility
- Type of prison, Cat A, B, C etc.
- The facilities own business continuity arrangements
- Any rezones
- Any Potential Alternative supplies required (where these will come from and volume required)
- Key contacts for that facility

Prison Category's
Category A – Category A prisoners are those that would pose the most threat to the public, the police or national security should they escape. Security conditions in category A prisons are designed to make escape impossible for these prisoners.

Category B – Category B prisoners do not need to be held in the highest security conditions but, for category B prisoners, the potential for escape should be made very difficult.
Category C – Category C prisoners cannot be trusted in open conditions but are considered to be prisoners who are unlikely to make a determined escape attempt.

Category D – Category D prisoners can be trusted in open conditions

5.2 Acute Hospitals

Definition:
An institution providing medical and surgical treatment and nursing care for sick or injured people.

- Institution remains open 24/7 365 days a year, therefore, cannot close due to a I2S or WQ
- event
- Users defined as 'vulnerable' based on health-related grounds – are unable to provide themselves with alternative supplies during an I2S or WQ event – this includes difficulty with boiling and collecting water from a source.
- Users cannot be easily or quickly relocated or evacuated due to their high dependency needs (HDU, ICU, NICU etc)
- Users are admitted and stay overnight
- Institute offers acute care
- Surgical units and sterilization on site
- Vulnerability of patients due to ill health, (neonatal, oncology, cardiology, HDU, ICU) high risk, likelihood of patients passing away if moved Renal facilities – requires mains fed water that is purified to a very high standard.

IWNL Response / Provisions:
IWNL will produce a site-specific Hospital Information Pack that includes the following:

- Major risks and vulnerabilities for the individual facility
- The facilities own business continuity arrangements
- Critical units/wards
- Any rezones
- Any Potential Alternative supplies required (where

these will come from and volume required)
- Key contacts for that facility

5.3 Nursing/Care Homes

Definition:
These are residential, which means people live in them either short or long term. They provide accommodation, meals, personal care (such as help with washing and eating) and they also have registered nurses who can provide care for more complex health needs.

- Vulnerability due to frailty, age or health – in ability to be able to supply themselves with water or fetch alternative supplies an interruption
- Users may also suffer from mental health related issues
- Users stay overnight
- Users are provided with welfare as part of their stay which food and water as unable to provide this themselves
- Cannot close or relocate easily due to the complex and broad nature of the inhabitants needs

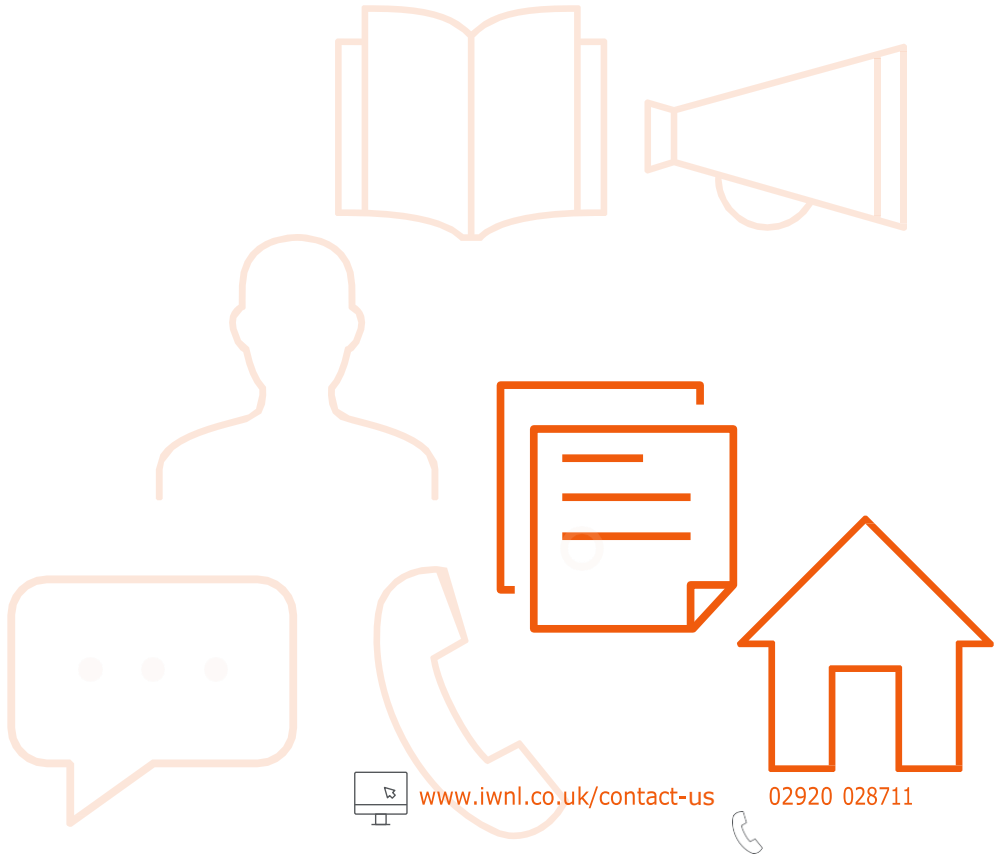
IWNL Response / Provisions:
Best endeavours – priority will be given to our domestic customers, but best endeavours will be made in order to supply these facilities with an additional supply of water – bottled water is the most likely in order to ensure residents do not have to collect or boil water from a bowser or CCB.

5.4 Schools

Definition:
An institution for educating children.

- Vulnerability due to the age of the attendees
- Can close schools – but this has social related implications (childcare)
- Captive status during the day, unable to leave site to procure an alternative supply

IWNL Response / Provisions:
Best endeavours – priority will be given to our domestic customers, but best endeavours will be made in order to supply these facilities with an additional supply of water – bottled water is the most likely in order to ensure staff and children do not have to collect or boil water from a bowser or CCB.

6.0 Definitions

Term	Meaning
Vulnerable Customers	Individual domestic customers who are registered on the Vulnerabilities Register
Priority Customers	Grouping of individual vulnerable customers, such as prisoners, patients, school children etc. In a non-domestic setting
Arlington Tanks/CCB's	Collapsible Combi Boxes
SEMD	Security and Emergency Measures Direction
WQ	Water Quality
12S	Interruption to Supply
HDU	High Dependency Unit
ICU	Intensive Care Unit
NICU	Neo-natal Intensive Care Unit