



Our vulnerable customer strategy

June 2023 - February 2025



Our vulnerable customer strategy

Promoting the support of vulnerable customers isn't just about doing what's right, it's at the heart of who we are. By actively addressing the needs of those who may face challenges we are not just meeting regulations, we are embracing our responsibility to make a positive impact on the communities we serve.

By focusing on supporting vulnerable customers, we are building a stronger bond with you. Your trust is our priority, and our commitment goes hand in hand with our dedication to delivering quality water services. We're not just fulfilling our obligations, we are defining a new standard of customer care that reflects our shared values and sets us apart as a company that cares about each and every one of our customers.

We (Independent Water Networks) provide water and wastewater services to consumers on networks across the UK.

Our customers are homeowners and tenants, small-business owners and commercial units, and residents of assisted-living apartments.

We can help customers registered for priority services:

- in emergencies;
- by finding alternative ways to send documents and communications;
- by allowing a person they trust to help them manage their account;
- by recommending services that can help them manage their account;
- with doorstep password schemes; and
- with financial assistance.

Key principles

The following list of principles sets out how we identify and help customers who need extra support.

1. IDENTIFY AND UNDERSTAND VULNERABLE CUSTOMERS:

We'll identify the different types of vulnerable customers within our network. This could include people with disabilities, older adults, low-income households, victims of abuse, people with language barriers, or any other group that needs specific support.

2. CARRY OUT A NEEDS ASSESSMENT:

We'll carry out a thorough needs assessment to understand the specific challenges, requirements and priorities of vulnerable customers. This may involve surveys, focus groups, interviews or working with advocacy (support) and charity groups. This will help us learn about people's experiences when dealing with their utility companies, the barriers they face and what they expect from us.

3. DEVELOP INCLUSIVE POLICIES AND PRACTICES:

We'll review and adapt our existing policies, procedures and practices to make sure they are inclusive and meet the needs of vulnerable customers. This may involve providing accessible ways of communicating with us, offering flexible payment options and helpful technologies, or having procedures in place for handling sensitive personal information.

4. TRAIN STAFF:

We'll provide full training for staff on how to effectively serve and support vulnerable customers. This will cover topics such as empathy, understanding diverse needs, communication techniques, recognising signs of vulnerability and responding to sensitive situations. Our aim is to give our staff the means and the confidence to take action when they identify any signs of vulnerability, to offer additional help which could benefit our customers, and to be patient and compassionate when communicating with vulnerable customers.



5. INCREASE ACCESSIBILITY:

We'll make sure that our residents' events (such as face-to-face meetings and community events), digital communications, products and services are accessible to everyone, including those with disabilities.

6. ESTABLISH PARTNERSHIPS:

We'll work with other organisations, advocacy and charity groups or community service providers that specialise in supporting vulnerable people. We'll form partnerships with these sectors to access additional resources, expertise and guidance, and use their insights to continuously improve our support for vulnerable customers.

7. PROVIDE TAILORED SUPPORT AND RESOURCES:

We'll develop targeted support programmes, resources and services that are specifically designed to meet the needs of vulnerable customers. This could include financial assistance programmes, specialised customer-support provided via our trained specialist customer service advisors, educational materials or dedicated helplines. We'll regularly evaluate and adapt these services, based on customer feedback and changing needs.

8. EMPOWER AND INVOLVE CUSTOMERS:

We'll involve vulnerable customers in the decisions we make by asking for their input and feedback. We'll set up advisory boards or forums where customers can tell us how we can better meet their needs, and actively involve customers in influencing our policies, practices and services.

9. MONITOR AND MEASURE EFFECT:

We'll have measures and indicators in place to monitor the effect of initiatives for vulnerable customers. We'll regularly assess how effective our programmes and practices are through feedback, surveys or other methods, then use this information to make improvements and demonstrate progress over time.

10. CONTINUOUSLY IMPROVE:

We'll stay committed to continuously improving by regularly reviewing and updating our long-term plan for vulnerable customers. We'll stay informed about emerging challenges, changes to regulations, and best practice in supporting vulnerable customers. We'll adapt our strategies to make sure they continue to be relevant and effective.

We have identified four key areas where we can help make significant improvements for customers in vulnerable situations.

- Improve how we identify vulnerable customers, and gather, analyse and present data effectively.
- Provide more support to customers struggling with their bills.
- Improve our customer service for vulnerable groups.
- Work with partners from other sectors on issues that affect us all.

Each key area that we identified is supported by specific outcomes we aim to achieve while this strategy is in place. For instance, to support customers facing financial challenges, we aim to provide better help to those at risk of debt. We also aim to develop our customer services for vulnerable groups to meet the unique needs of individual customers. It is crucial that we approach strategies for vulnerable customers with empathy, respect and a commitment to upholding their rights and dignity.

By having in place our own strategies dedicated to vulnerable customers, we can demonstrate our dedication to supporting and protecting those most in need of help.

We need to make sure we have systems and processes in place to deliver accessible communications on time, and build a customer-focused culture across the business which we can continuously learn from. (This also applies to third parties who work on our behalf and internal stakeholders who run and maintain the network.) We will need to work together in an open and honest way to achieve our shared goals in line with our company vision, mission and values.

We are aware there is some sensitivity around labelling customers as 'vulnerable'. We take account of this by considering each person's individual circumstances.



Our definition of vulnerability

'Vulnerability can be temporary, occasional, or permanent. It is a changing state that needs a flexible, tailored response from us as a company.'

Many people in priority service situations would not think of themselves as a priority. It is our responsibility to notice the signs and take appropriate action.

A priority service customer may be someone who:

- uses medical equipment that relies on electricity or water;
- is deaf or hard of hearing;
- has a disability (including a mental-health disability) or who is chronically ill;
- needs documents translated into another format or language;
- lives with children under five;
- is of pensionable age;
- temporarily needs extra support;
- is blind or partially sighted;
- has lost, or partly lost, their sense of smell;
- is having dialysis treatment at their property;
- is experiencing financial hardship; or
- is isolated geographically.

We are aware that vulnerable situations can vary widely and develop over time, influenced by factors such as social and economic issues. We aim to make sure that customers in these situations have adequate protection and support when necessary. To understand how our policy decisions affect different customer groups, we will continue to improve how we involve our customers.

This will mean we can make decisions based on best evidence, even in challenging circumstances.

Customers in vulnerable situations often face many barriers compared with other customers. They may have competing priorities, limited free time, or struggle with making complex decisions and need extra support to overcome these issues.

Research from Scope, the Money and Mental Health Policy Institute and Christians Against Poverty highlights these challenges. Our aim is to keep barriers for vulnerable customers to a minimum, allowing them to confidently engage with us so that we can provide support when they need it.

Where are we now

We have already pledged to improve our awareness, support and services and how we identify customers who need extra support from us. This support includes the following.

- Customising our website and offering translation services (text to speech) and support for neurodiversity through the 'Recite Me' tool on our website.
- Using a doorstep password scheme to deter bogus callers.
- Training all staff, plus offering an extra level of training for some teams of advisors and customer liaison officers.
- Allowing customers to nominate someone to manage their account on their behalf through a power of attorney.
- Using financial vulnerability and debt schemes.
- Offering Braille, large print and audio bills.
- Giving advanced warning of planned work that might affect services.
- Providing alternative water and heating supplies, such as bottled water and temporary mobile heaters, during incidents.
- Offering extra support during a loss of supply. Our customer service team will contact people, usually by phone, at the start of an incident and then keep them updated.
- Monitoring quality of service through quality assurance schemes.



Our aims and objectives

The following section sets out a series of commitments that we will make to our customers as part of this strategy, with the time we estimate to deliver them.

1. TO IMPROVE HOW WE IDENTIFY VULNERABLE PEOPLE, AND GATHER, ANALYSE AND PRESENT DATA EFFECTIVELY

| Activity | Duration |
|---|------------------|
| Smart meter All of our supplies are metered. We can read these meters remotely using AMR technology, and plan to use the data (information) from them to create personal and targeted communications. | 2 to 3 years |
| Credit-reference companies Use data from credit-reference companies to try to prevent financial difficulty and provide communication and specific help according to people's circumstances. | Within 12 months |
| Data-sharing agreements Take part in the Priority Services Register data-sharing project across distribution network operators (along with their trade bodies the Energy Networks Association and Water UK). The project shares information on customers who need priority services across different utilities. | 2 to 3 years |
| Engaging stakeholders Identify stakeholders, such as charitable organisations, customer service champions and welfare officers, and identify an appropriate way of communicating with them, for example, email or video-call. Keep in regular contact by updating them and asking for advice, support and feedback. | Within 12 months |
| Legal and regulatory checks Carry out regular internal audits of our customer services and aim to achieve industry accreditations. Monitor performance and measure ourselves against industry standards. | Yearly review |
| Innovation and technology Use industry best practice, through associations such as Contact Centre Management Association and the Welsh Contact Centre Forum, to stay up to date with current trends in technology and within the industry. Work with our partner Content Guru in developing the technology used in our Contact Centre to suit our customers' needs. | Ongoing |

By putting these measures in place, we can share information securely and responsibly, improve how we identify vulnerable customers and use information more effectively to support and protect them.

2. TO PROVIDE SUPPORT TO CUSTOMERS STRUGGLING WITH THEIR BILLS

| Activity | Duration |
|--|------------------|
| Financial education and counselling Work to set up partnerships with charities such as StepChange Debt Charity so we can offer trouble-free referrals for financial education and counselling. | Within 12 months |
| Flexible repayment options Introduce flexible repayment terms which work for our customers, matching when, and how much, they can afford to pay. | Within 12 months |
| Tailored help Collections advisors send emails and texts to customers which are tailored to the customer's situation. | Ongoing |
| Empathy and support Regularly update training for collections advisors and customer service advisors to provide high levels of compassionate support and guidance. | Ongoing |
| Regular reviews and assessments Continuously review through quality assurance and monitoring performance indicators. | Yearly review |

A customer-focused debt strategy should prioritise people's financial well-being and aim to help them overcome their debt challenges while maintaining dignity and financial security.



3. TO IMPROVE CUSTOMER SERVICE FOR VULNERABLE GROUPS AND HAVE CLEAR SERVICE STANDARDS

| Activity | Duration |
|---|--------------|
| Training and awareness Regularly update training for collections advisors and customer service advisors to help them better identify vulnerable customers. | Ongoing |
| Tailored customer service Continue to train advisors in how to tailor services and communications to meet the specific needs of their customers. | Ongoing |
| Handling complaints and resolving disputes Review our complaint-handling and dispute-resolution process to make sure we are meeting the needs of our vulnerable customers. | 2 to 3 years |
| Accessibility measures Add other ways of communicating with customers, for example, WhatsApp or another social media channel. Review existing support for computer and technology skills. Where we can, try to time any planned interruptions to the water supply so they don't happen when a customer could be using dialysis equipment. Have in place a Knock and Wait scheme, where if a customer tells us they have mobility needs, we understand that it may take them a bit longer to answer the door. | Medium term |
| Customer feedback Use feedback from vulnerable customer engagement surveys to shape our process, policy and services. | 2 to 3 years |
| Work with stakeholders Build relationships and partnerships with charities, housing associations and other members of the industry, to share best practice. | 2 to 3 years |

By putting these measures in place, we can improve customer services for vulnerable groups, making sure they receive the necessary help and support.

4. TO WORK WITH PARTNERS FROM OTHER SECTORS

| Activity | Duration |
|--|--------------|
| Define a shared goal Agree on how best to support vulnerable customers. | 2 to 3 years |
| Identify key stakeholders Build relationships with charities, housing associations and organisations such as the Consumer Council for Water, to share and learn from best practice. | 2 to 3 years |

To work with others effectively, we need to remain committed, be actively engaged and be flexible. We also need to welcome diverse perspectives, shared responsibility and a joint approach to dealing with issues that affect us and other sectors.

