



Vulnerability strategy

Making our services accessible for all.



Albion Water is committed to delivering an inclusive and responsive water and wastewater service for all customers. We recognise that some customers may need extra help due to a range of vulnerabilities—whether physical, mental, emotional, financial or circumstantial. This revised Vulnerability Strategy sets out our commitment to identifying and supporting those customers, now and in the future. It has been developed in line with Ofwat’s “Service for all” guidance and their 2024 Draft Vulnerability Strategy Submission Guidelines.

This strategy outlines our current approach, planned improvements, and future commitments, including measurable targets and how we intend to monitor success. It also acknowledges the challenges we face as a small NAV (New Appointment and Variation) company and how we will address them.



Abion Water executive statement

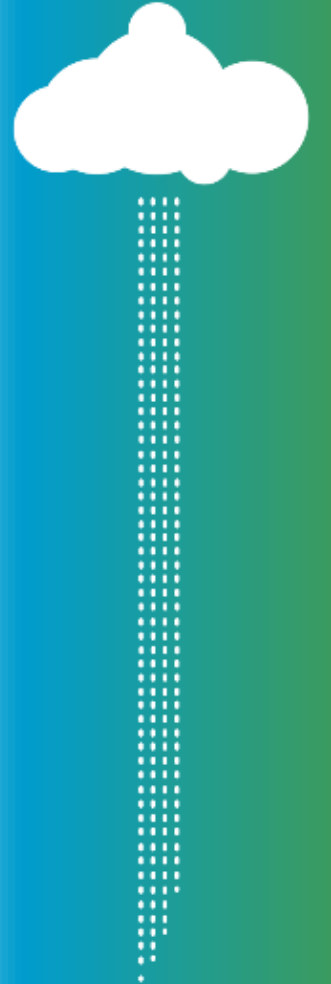
Managing Director's Statement

Abion Water delivers a vital service to our customers. Whether that be water, wastewater, or both, it is a service that is essential to the health and wellbeing of the populations we serve. We are committed to delivering a great service to all our customers. In doing this we recognise that certain individuals may require a little extra help. This strategy sets out how we intend to support these customers. We will demonstrate how we proactively identify those requiring extra support, how we record it and how we use that data to tailor our services and continually improve.

Taking particular notice of Ofwat's Service for all, vulnerability guidance, we have developed a set of principles that mean we are able to deliver an agile customer service model that can flex and adapt where needed to serve all. The past few years have been challenging for many people. As a vital service provider, we recognise the part that we can play in making life easier for our customers. Vulnerability can come in all shapes and sizes and means different things to different people. This means that we must listen to our customers and take our lead from them as to what support they need, where we can.

This document is the cornerstone in how we support our vulnerable customers. However, we commit to continually review this document and its supporting documents to evolve our policies and practices, utilising technology and industry best practice to ensure that we deliver a cost-effective service for all, now and in the future.

*Adam Shore
Managing Director, Abion Water Limited*



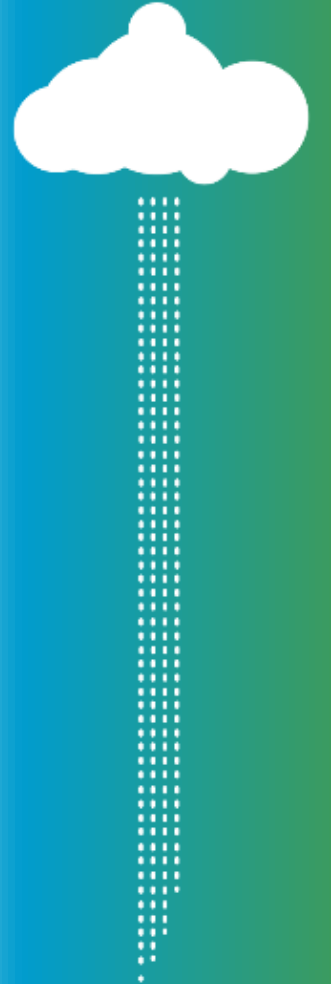
Our Commitment to Vulnerable Customers

We believe that every customer should be able to access a reliable, safe and tailored service, no matter their personal circumstances. Vulnerability can be permanent, temporary, or situational, and it may affect people at different times in their lives. Our commitment includes:

- Listening to customers and adapting our services accordingly.
- Taking a proactive approach to identifying vulnerability.
- Providing extra help that is responsive, inclusive, and effective.
- Continuously reviewing and improving our approach.

We offer a range of services to support our customers, including:

- Priority Services Register (PSR) enrolment. - Large print bills and correspondence. - Password protection for home visits. - Bottled water during supply interruptions, prioritised for vulnerable customers. - Quick response to email communications. - Meter reading technologies that minimise disruption, especially for those with mobility issues.



Delivering Extra Help: Short, Medium and Long Term

Short Term (2024-2025):

Formalise review process for PSR entries (contact 90% of customers every 24 months; confirm details with 35%). - Expand online and offline self-registration options for the PSR. - Raise awareness through bill inserts, website banners, and community outreach. - Partner with local organisations to help identify and refer vulnerable individuals.

Medium Term (2026-2028)

Enhance our staff training program to recognise vulnerability and respond empathetically and effectively. - Work with developers and property managers to identify new residents who may require support. - Integrate PSR support tools into our planned customer service app. - Benchmark against larger companies to adopt appropriate innovations.

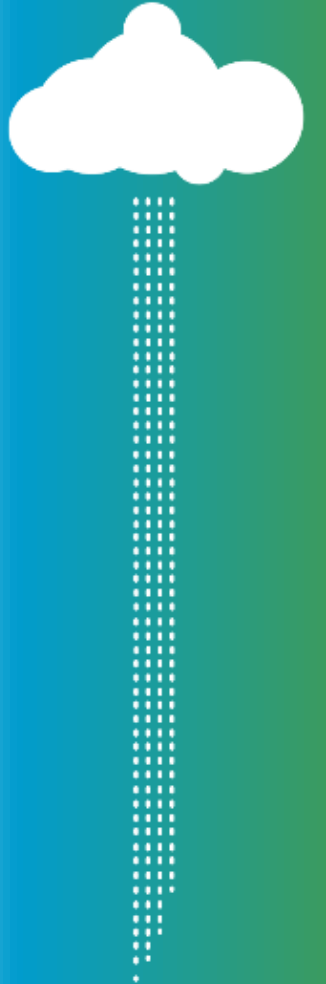
Long Term (2029 onwards)

Establish a proactive data-sharing pilot with energy companies (subject to consent). - Improve reporting tools for internal tracking of support outcomes. - Aim to register at least 50% of the estimated eligible customers on the PSR.



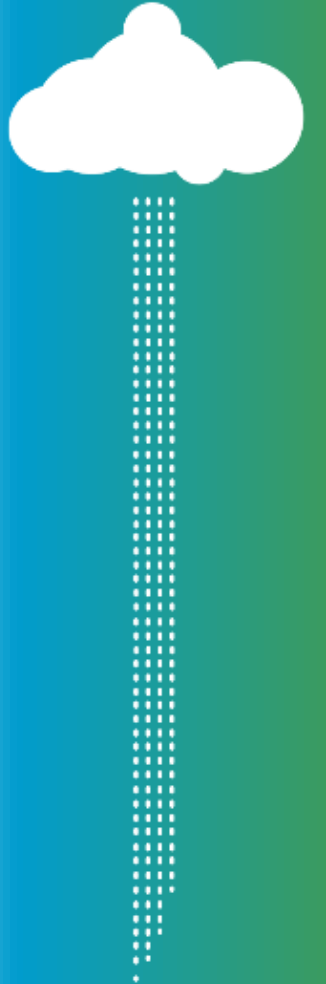
Governance, monitoring & KPIs

- A Vulnerability Champion will report quarterly to the Senior Leadership Team.
- Annual report including PSR growth, satisfaction levels, and service improvement areas.
- Implement performance indicators such as PSR enrolment rate, contact success rate, and customer satisfaction scores.
- Conduct independent reviews and benchmarking every two years.



Customer and Stakeholder Engagement

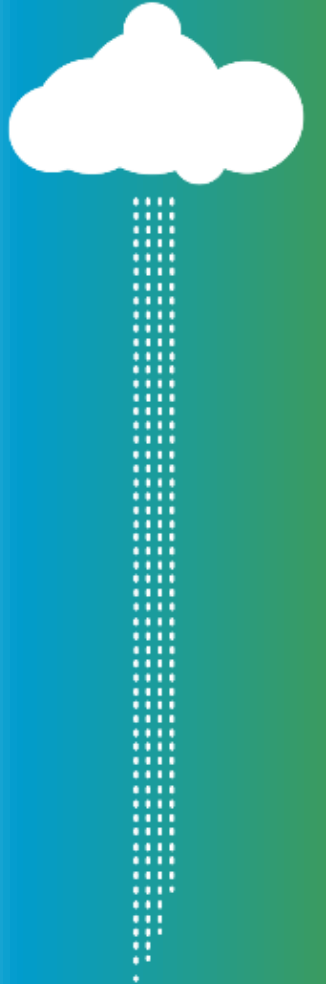
We recognise the value of working with customers and community stakeholders in shaping effective support. We will: - Gather feedback through annual PSR and customer service surveys. - Engage with CCW and other consumer bodies by end of 2025. - Attend community events and forums to raise awareness and gather input.



Addressing Gaps Between Need and Support

We acknowledge our current PSR coverage is lower than national averages. To bridge this:

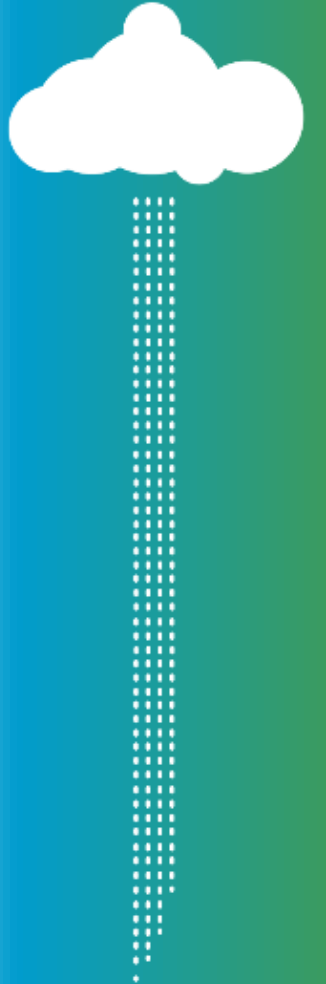
- Expand outreach campaigns targeting underrepresented groups.
- Improve accessibility of all customer contact channels.
- Increase promotional materials in different languages and formats.
- Publish annual updates showing PSR coverage against estimated need.



Financial Vulnerability

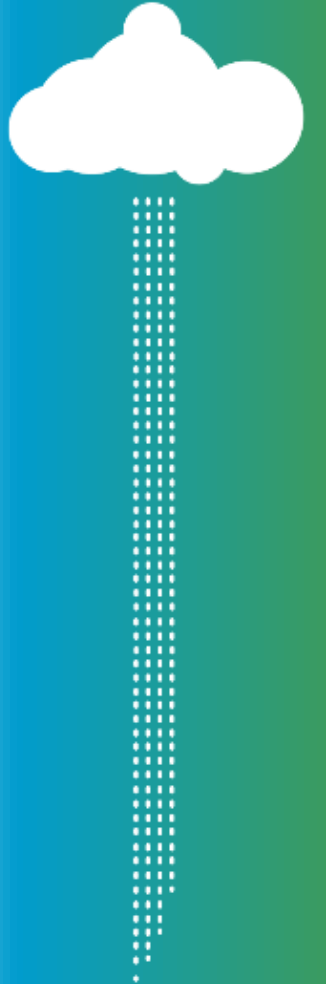
Though Ofwat's core guidance does not include financial vulnerability, we are committed to this area:

- We offer WaterSure and SAF tariffs to qualifying low-income customers.
- Promote these through our website, customer calls, and future bills.
- Refer customers to StepChange for independent debt advice.
- Honour the Government's Breathing Space scheme.



Accessibility and Publication

This strategy will be: - Published online as a PDF and in accessible versions (large print, audio, Easy Read). - Accompanied by a customer-friendly summary. - Reviewed and updated annually based on feedback and regulatory guidance.



Accessibility and Publication

Minimum Expectation	Compliance Rating	Implementation Plan	Monitoring Methods	Challenges	Targets & Timelines
High standards of service (5.1.1)	Compliant	Maintain PSR, prioritise vulnerable customers during incidents, deliver services like large print bills, bottled water, password scheme	Quarterly audit of PSR entries and usage statistics	Limited staff resources in remote areas	100% of PSR customers to receive appropriate support during incidents by end 2025
Inclusive by design (5.1.2)	Partially Compliant	Offer multiple contact channels, Easy Read formats, non-digital options	Annual accessibility review, customer feedback surveys	Small customer base limits economies of scale	All core services to meet inclusive design standards by end 2026
Identifying customers (5.1.3)	Noncompliant	Proactive outreach, PSR promotion via bills/website/staff prompts	Track PSR sign-ups quarterly	Low public awareness of PSR	Grow PSR to 5% by end 2025, 7% by mid-2026
Recording needs (5.1.4)	Noncompliant	Centralise PSR system, introduce review flags every 2 years	Review audit: 90% contact, 35% confirmed updates	Low response rates due to transient customer base	Meet Ofwat review thresholds by June 2026
Monitoring & reviewing strategy (5.1.5)	Compliant	Appoint Vulnerability Champion, annual customer survey, CCW engagement	Publish annual performance report	Lack of benchmarking data for NAVs	Year-on-year PSR satisfaction score improvement, baseline set by 2025 survey
Staff capability & culture (5.2.1)	Partially Compliant	External vulnerability training, integrate in staff onboarding	Post-training feedback, knowledge testing	Scheduling and resourcing for regular training	All staff trained in vulnerability recognition by end 2026
Continuous improvement (5.2.2)	Compliant	Annual customer feedback loops, learn from sector best practice	Quarterly strategy review at SLT	Limited internal capacity for innovation pilots	Implement at least one customer-informed improvement per year
Customer engagement (5.2.3)	Partially Compliant	Include customers in 2024–25 PSR survey and post-strategy engagement	Track feedback and integration into strategy	Resource constraints for large-scale engagement	Complete CCW-led customer focus group by Q2 2025
Bridging the needs gap (5.2.4)	Noncompliant	Use demographic proxies, compare PSR rate with estimated eligible population	Annual coverage and need-gap report	No area-specific data sources	Bridge gap by 15% by 2028 through targeted enrolment

