



# Customer Vulnerability Strategy

2024 to 2026

Making a Positive Difference

**business stream**  
A SCOTTISH WATER COMPANY



Naturally *different.*

## Our vision to Make a Positive Difference (MAPD)

We launched our vision to make a positive difference in September 2019, focused on the four areas which are important to us – our customers, our people, the environment and supporting our local communities. Our **customer vulnerability strategy** sits under our MAPD customer strand and supports our wider Responsible Business Strategy.

### Governance

Responsibility for delivering our **customer vulnerability strategy** sits with our Customer Services Director.

Given the strong alignment to our MAPD vision, our MAPD Steering Group, which is chaired by our CEO and supported by our Head of ESG, also support the delivery of our customer vulnerability strategy.

We have also established a number of sub-groups, including our MAPD Customer Working Group, which is chaired by our Customer Services Director. These groups provide our colleagues with a real opportunity to drive forward our ambitions by contributing ideas and working together to help deliver initiatives that support the delivery of our MAPD vision.

### Customer vulnerability - Overview

To date, in our sector and many others, customer vulnerability activity has been focused on household customers, however we believe we have a responsibility to support business customers who find themselves in a vulnerable situation, and as a result we launched our Customer Vulnerability Framework in late 2024 to support this aim. This strategy outlines our approach, key objectives and priority activities to support our ambitions.

#### Understanding customer vulnerability

We've developed our understanding of vulnerability through adopting the definition used in ISO 22 458: consumer vulnerability standard (see below) and by undertaking a gap analysis against the standard.

#### **Definition of customer vulnerability taken from ISO 22 458: Consumer vulnerability — Requirements and guidelines for the design and delivery of inclusive service**

*Vulnerability can affect anyone at any time. All consumers are different, with a wide range of needs, personal characteristics, health, abilities, and skills. These factors, plus the impact of life events and external conditions, such as organizational behaviour, can place consumers in a vulnerable situation, increasing the risk of them experiencing harm when dealing with organizations. Consumer vulnerability can be permanent, temporary or sporadic, long or short term. A consumer's needs and abilities can change over time, particularly if the consumer is faced with an unexpected change of circumstance or a particularly urgent or complex situation.*

To develop our approach to customer vulnerability, we've aligned our framework and activities to the ISO 22 458: consumer vulnerability standard. To help us better understand vulnerability and its drivers, we're working with external organisations, including specialist trainers, BPA Quality, and we're investing in training, resources and support to help us deliver our framework.

We recognise that vulnerability isn't always permanent and that it doesn't only impact a specific group of customers – it can affect everyone and can last for a short or indefinite time period. This understanding and the definition above are outlined in our Vulnerability Policy and support the decisions we're making around our delivery programme e.g. identifying an external signposting support services partner.

## Our customer vulnerability approach

### Our vision

To ensure we always provide the best possible support to help our customers who are in a vulnerable situation.

### Our mission

To ensure we provide every customer with an opportunity to explain their circumstances and that in response we provide an appropriate customer service based on their needs, which is led by compassion and without judgement or assumption. For customers dealing with issues that we cannot directly help them with, we will provide external signposting support. We will also ensure that our website and communications are accessible, and usable, for our customers.

To achieve this vision, we will develop and deliver an effective programme of activities that provide opportunities for us to better support any customers that are in a vulnerable situation; to help colleagues increase their knowledge on this topic; and to ensure this remains a long-term, priority workstream for us at Business Stream.

### Our values

Our values define how we do things at Business Stream and help shape our culture. They also support the delivery of our MAPD vision and customer vulnerability strategy.

- **Dependable** – We keep our promises and respond to our customers' promptly
- **Knowledgeable** – We're the water industry experts
- **Purposeful** – We're committed to making a positive difference
- **Supportive** – We're helpful and focus on delivering solutions
- **Progressive** – We're forward thinking and innovative

## Stakeholder Engagement

To help shape our MAPD vision and customer vulnerability strategy, we've engaged with both our internal and external stakeholders to gain their insight and views on how we can achieve our ambitions. We're also committed to identifying opportunities to learn from other organisations through peer-to-peer learning and events to increase our understanding of this issue and continuously improve our own approach.

### Internal stakeholders

We've surveyed colleagues to help ensure colleagues, particularly frontline colleagues, were given an opportunity to input into this strategy and we regularly seek feedback and views from colleagues on all our MAPD initiatives through both our annual colleague engagement survey and informal feedback channels.

### External stakeholders

We've partnered with a number of external organisations to help us achieve our ambitions. And these same partners also provide guidance around our approach. This includes Business in the Community (BiTC), the Institute for Customer Service (ICS), the Collaboration Network, BPA Quality and the National Support Network (NSN).

To help gauge our customers views on our vision and strategy, going forward we'll incorporate questions within our annual customer survey, which provides us with an opportunity to measure awareness levels around our commitment to our customer vulnerability approach and identify where there is scope to make further improvements.

## Objectives

- **To ensure colleagues are equipped to have the appropriate conversation with customers in vulnerable situations.**
- **To ensure that our customer service and propositions are inclusive, considerate and responsive to a customer's particular circumstance or concern.**
- **To work with an external partner to provide signposting support to customers (and colleagues).**
- **To ensure our website and communications are accessible and usable for customers by making use of appropriate fonts, formats, colours, navigation tools and assistive technology.**
- **To use data and insights to capture and better understand the issues impacting our customers so we can continue to refine our approach and ensure our support meets our customers' needs.**

## Activities

Provided below is a high-level overview of some of the key activities we are currently or plan to take forward to help us meet these objectives:

### **To ensure colleagues are equipped to have the appropriate conversation with customers in vulnerable situations.**

- Roll out a full day's training to all frontline (customer facing) colleagues, delivered by specialist providers, BPA Quality, (and third party partners) by end of year 1, to better equip them to understand vulnerability and its key drivers, identify customers facing vulnerable situations and to have the confidence to respond appropriately – *in progress*
- Consider refresh sessions and weaving training into inductions, as well as any resources to provide continued support to colleagues and communicate plans with colleagues – *in progress*.
- Develop a policy to support this strategy and outline our approach to customer vulnerability - *achieved*.

### **To ensure that our customer service and propositions are inclusive, considerate and responsive to a customer's particular circumstance or concern.**

- As above.
- Ensure colleagues are aware of the financial support we can provide to any customer struggling to pay their bill (including flexible payment options) and of the new initiatives we're rolling out as part of this strategy – *on-going*.
- Consider and develop our data flagging requirements and approach – *in progress*.
- Identify opportunities through our customer journey mapping exercises to make improvements to our services – *in progress*.
- Work with Wholesalers to explore support options for customers regarding accessible meters – *in progress*.

### **To identify an external partner(s) to provide signposting support.**

- Identify signposting approach/partners - *achieved*.
- Explore option of using on a trial basis to test impact/level of use - *achieved*.
- Consider communications (both internally and externally) to help maximise impact of service – *on-going*.

**To ensure our website and communications are accessible and usable for customers by making use of appropriate fonts, formats, colours, navigation tools and assistive technology.**

- To develop our accessibility strategy and action plan – *in progress*.
- To work with our external partners to ensure our new website platform (currently under development) is accessible – *in progress*.
- To review our customer communications – across all touchpoints - to identify ways we can provide better accessibility and inclusivity to customers – *in progress*.

**To use data and insights to better capture and understand the issues impacting our customers so we can continue to refine our approach.**

- To identify a best approach to gathering insight on the key issues impacting our customers so we can ensure that the support we provide caters to these needs – *in progress*.
- To use data and insights to identify customers who may potentially benefit from extra support and use this knowledge to develop initiatives that meet our customers' needs – *to be developed*.
- To identify and roll out a set of measurements designed to track the impact of our activities and support continuous improvement – *in progress*.

## **Delivering our Strategy**

Our MAPD Customer Working Group is responsible for the delivery of our customer vulnerability strategy. The Group, which is Chaired by our Customer Services Director, takes the lead on progressing actions and ensuring our approach is aligned to the ISO standard. Our customer vulnerability strategy and approach has been signed off by our Executive Leadership Team.

Our strategy is supported by an action plan that we keep under regular review, and we will review our Vulnerability Policy on an annual basis. We'll continue to provide updates on our progress on our website. We'll also regularly review our progress in the context of best practice through our partners and key customer service stakeholders, including the Institute for Customer Service, Consumer Scotland and the Collaboration Network.

Our driver for investing in this programme is because we believe it's the right thing to do. We will ensure that any financial investment remains proportionate and cost effective through on-going feedback/analysis to ensure our approach is meeting our customers' and colleagues needs.

### **Our commitment to our vision - disclosure and verification**

It's really important to us that our commitment to our vision and supporting initiatives are trusted and credible. To help achieve this, we've committed to a number of external assessments and reporting methods (both internally and externally) to hold ourselves to account, measure the impact of our programme (both on colleagues and the wider business) and to identify any gaps.

#### **Q1 (April-June):**

- Sustainability Report –progress update on customer vulnerability framework (annual)
- United Nations Global Compact reporting (annual)

#### **Q2 (July-Sept):**

- Publish Vulnerability Strategy on external website (reviewed quarterly)
- Publication of customer savings stats (annual)
- EcoVadis assessment (annual)
- MAPD anniversary update (annual)

#### **Q3 (Oct-Dec):**

- EcoVadis assessment (annual)

**Q4 (Jan-March):**

- EcoVadis rating published (annual)
- Employee engagement survey (annual)
- Review of customer vulnerability objectives and action plan (annual)

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