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Veolia Water Projects Ltd Final Vulnerability Strategy

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1. Introduction

Providing customers with clear, accessible information is essential for all water companies to achieve ambitions for a high standard of customer service and support. All customers should be aware of core customer information and be able to access it easily in order to understand the services they are entitled to, their rights as customers and the avenues available to seek additional assistance from the water companies when required.

The 'Strategic Policy Statement for OFWAT' empowers OFWAT to emphasise the importance of water companies delivering an equitable and enhanced water service to all customers. This includes prioritising the improvement of support services and complaint resolution mechanisms. Consequently, adhering to sections 12A and 13 of the Water Industry Act 1991, Condition G of any water company's licence outlines the mandatory core customer information that water companies must give to their customers.

In February 2024 OFWAT introduced a new, customer-focused licence condition, known as Condition G, which will help increase water companies' customer focus and encourage the very best services. The updated objectives of Condition G are outlined below:

'Through meeting the principles of the licence condition, companies will be required to put the customer experience at the heart of any decision they make and, in the process, deliver the good service that customers want.'

In accordance with Condition G, OFWAT expects all water companies to take accountability for the management of vulnerable customers. VWPL will implement the requirements of Condition G in relation to the area for which it holds an appointment.

1.1. Veolia Water Projects Ltd background

Veolia's Impact 2023 strategy outlines Veolia's ambition to become the benchmark company for ecological transformation, leading change and taking actions for sustainability by integrating strategies that protect the planet, environment and communities. This includes finding innovative ways and solutions to secure the supply of water for its customers, protect and enhance the environment and reduce carbon emissions.

Veolia's overarching goal is to establish itself as a leading company driving ecological transformation. At a local level, Veolia Water Projects Ltd (VWPL) holds a significant responsibility within the community, as it provides services that are vital for sustaining life and supporting the local economy. VWPL is committed to providing a wholesome supply of potable drinking water, a high quality level of customer service and ensuring all complaints are dealt with in a timely and appropriate manner.

VWPL was granted the status of Appointee and thus water and sewerage undertaker for the operating area described as Tidworth, Perham Down and Ludgershall [part] on 2 June 2009, succeeding Thames Water in this role. The Appointment came into effect on 8 June 2009.

Within its inset area, VWPL provides water and wastewater services to approximately 16,290* customers, including household and non-household customers, as well as the Defence Infrastructure Organisation (DIO), and the Leckford Bridge export to Wessex Water Ltd.

**from the 2024/25 Environment Agency WRMP Annual Return Data Submission*

Approximately 60% of VWPL customers within the inset area are associated with the Defence Infrastructure Organisation (DIO) including two army garrisons and Service Family Accommodation (SFAs). VWPL supplies Wessex Water Ltd with a bulk transfer known as the Leckford Bridge Bulk transfer, which equates to approximately 30% of the water abstracted. The remaining 10% of the volume supplied within the inset is distributed to approximately 4214 household and 100 non-household customers in Tidworth and Perham Down.

1.2. Limitations

During VWPL's initial discussion with OFWAT, it was highlighted that the Priority Service Register (PSR) registration rates for vulnerable customers in the inset area were lower than both industry and regional averages. While we acknowledge this concern, it's important to understand that approximately 60% of VWPL's customer base consists of DIO/MoD tenants who don't interact with the company directly, limiting its ability to identify and register vulnerable individuals. Nevertheless, to meet Condition G requirements, VWPL has collaborated extensively with the MoD over the past year to develop and implement a system ensuring vulnerable customers receive appropriate support. The DIO has established that all communications will be channeled through them to army garrisons and Service Family Accommodation (SFA).

As a New Appointee (NAV), VWPL does not benefit from the same funding routes available to other incumbent water companies, with customer bills subject to OFWAT's "no worse off" principle. Wessex Water Ltd operates as the incumbent for the Tidworth inset area and as such VWPL is linked to Wessex Water Ltd and Southern Water tariffs and customer charges.

2. Purpose of the strategy

This strategy document outlines Veolia's comprehensive approach to meeting five critical regulatory frameworks:

1. OFWAT's 'Service for All' vulnerability guidance - VWPL has developed and maintained a robust vulnerability strategy that meets or exceeds minimum regulatory expectations for supporting customers in vulnerable circumstances.
2. OFWAT's 2022 'Paying Fair' guidelines - following a thorough review of services against these guidelines, improvements have been implemented to ensure fair and accessible services for all customers.
3. OFWAT's customer-focused guidance register and incident support requirements - VWPL has integrated best practice for customer care, service delivery, and incident management, incorporating lessons learned from OFWAT's customer service reports to enhance its support systems.

4. OFWAT's Priority Service Register standards with a focus on key areas of definition, needs and services, data checking and registration to ensure comprehensive support to vulnerable customers.
5. OFWAT's analysis of customer experiences during sewer flooding incidents highlighting four critical areas of communication, support during an incident, financial support and resolution.

VWPL's strategy will detail the following:

- The company's approach to delivering extra help in the short, medium, and long term;
- The company's plans to meet each of the minimum expectations set out in OFWAT's 'Service For All' vulnerability guidance;
- The information or data that the company will use to understand whether its strategy is on track, including clear measurable commitments or targets;
- The company's engagement with customers and other stakeholders in developing its strategy; and
- Any gap between likely underlying needs and current extra help provided and how the company plans to bridge any such gaps.

3. The values that shape VWPL's strategy for customers who need extra help

The following details the core values that VWPL uses to provide additional support to vulnerable customers and has helped tailor this vulnerability strategy:

- VWPL is committed to delivering customer care and services tailored to an individual vulnerable customer and their needs;
- VWPL services are inclusive and accessible to all customers;
- All VWPL customer-facing staff have the correct tools, training, confidence and awareness to deal with complex situations;
- VWPL believes that water should not be rationed by a customer's ability to pay and that no one should live in water poverty;
- VWPL actively engages with customers who are financially vulnerable.
- VWPL supports a holistic approach to debt advice and management; and
- VWPL will offer tailored solutions with flexibility to meet an individual's financial circumstances.

4. Why is it important to help vulnerable customers?

It is crucial to help vulnerable customers for several important reasons; during these challenging economic times, with the ongoing cost of living crisis affecting many UK households, our role as an essential service provider becomes even more critical. As Veolia Water Projects Limited (VWPL), we recognise our fundamental responsibility to:

1. Ensure continuous access to essential water services for all customers
2. Provide excellent support and specialised assistance at no additional cost
3. Proactively identify and reach out to customers who may need extra help
4. Offer user-friendly, accessible services that accommodate various needs
5. Maintain affordable service options to help customers manage their bills
6. Deliver tailored support solutions for different vulnerability circumstances

We are committed to making our services as beneficial and accessible as possible, actively working to identify and assist customers who may require additional support. This commitment reflects our understanding that water is a vital service that must remain accessible to all, regardless of their circumstances.

4.1 Types of Vulnerable Customer

VWPL understands that anyone can find themselves in need of additional assistance. Vulnerability is not confined to a specific timeframe, nor is it always apparent. In certain instances, it can arise due to factors such as age, physical or mental health conditions, literacy limitations, language barriers, unemployment, digital exclusion, or sudden life changes like bereavement or divorce.

Further details can be found below:

4.1.1 Hearing impairment/deafness:

VWPL aims to

- Tailor communication methods during emergencies;
- Provide subtitles for our customer help videos; and
- Facilitate the designation of a nominated point of contact to represent the customer and handle communications on their behalf.

4.1.2 Dementia/cognitive impairment:

VWPL aims to

- Provide individuals with dementia the opportunity to register with us, ensuring any contacts are tailored to their needs; and
- Communicate with a nominated contact on behalf of the customer and encourage them to obtain power of attorney.

4.1.3 Mental health

VWPL aims to

- Equip staff with the right questions to encourage disclosure and provide support for customers if required;
- Offer individuals experiencing mental health challenges the opportunity to register with us, ensuring tailored communication and the option to speak with a nominated person on their behalf; and

- Train staff, through our wellbeing group, to become mental health first aiders, enabling them to support colleagues, friends, and family members.

4.1.4 Dialysis

VWPL aims to

- Provide free bottled water in emergency situations or planned maintenance work; and
- Promptly assess the quality of our supply after an interruption event to confirm it is safe for use in dialysis procedures.

4.1.5 Blind or partially sighted

VWPL aims to

- Read meters up to four times a year, upon the customer's request;
- Arrange for water supply interruption notices to be communicated via telephone or text messages; and
- Offer bills and a selection of our leaflets in large print or braille formats.

4.1.6 Pensionable age

VWPL aims to

- Offer a personal password in the customer's chosen format, which will be used during every visit to help guard against bogus callers;
- Ensure that all VWPL staff carry identification cards displaying their name, photograph, our logo, and a telephone number to verify their identity;
- Read meters up to four times a year, upon the customer's request;
- Explore the possibility of relocating the meter to a more accessible location;
- Deliver free bottled water during emergencies or planned work if the customer informs us of mobility issues;
- Offer to redirect bills to a carer, family member, or friend if the customer is hospitalised, living in residential care, or staying with relatives for an extended period; and
- Communicate with a nominated contact on behalf of customers.

5. Additional services that VWPL will provide to all customers

VWPL provides a comprehensive suite of specialised support services, ranging from immediate assistance to long-term solutions, designed to meet the diverse needs of all our customers throughout their journey with us.

5.1 Short Term Services

The following details the additional services that are currently available.

5.1.1 Supply Interruptions

To ensure the reliability of the network, VWPL will occasionally have to interrupt water supplies to carry out planned work. During these events, VWPL will warn all impacted customers by delivering a letter through their door, 48 hrs in advance if the planned interruption is going to last more than four hours.

On rare occasions an interruption to supply is caused by an emergency, such as a burst main. Due to the nature of the event, VWPL is unable to forewarn customers. However, VWPL will endeavour to inform all customers within the impacted area and inform them of the actions they should take, and when normal services will be restored. Depending on the nature of the vulnerability, if the water supply is interrupted for a prolonged period of time and customers are unable to collect water from a supply point, VWPL will arrange for bottled water to be delivered directly to their door or arrange alternative accommodation until the supply is restored.

VWPL's guaranteed standards scheme satisfies the requirements set out in the Water Supply and Sewerage Services (Customer Service Standards) Regulations. This is more commonly known as the Guaranteed Standards Scheme (GSS), and includes some additional enhancements. It details the payment VWPL has to make if it does not meet its normal high standards of service in any of the areas identified. In the event of failing to uphold the mentioned standards, VWPL will automatically provide financial compensation to its residential and commercial customers, as outlined in the GSS. The payment will be made automatically. If VWPL fails to credit the account of a customer who has made the claim or to send an automatic payment, the customer may be entitled to a penalty payment.

VWPL's enhanced GSS encompasses additional commitments, including:

- Addressing inquiries and facilitating changes
- Responding to incidents of sewer flooding
- Promptly handling complaints
- Minimising water supply disruptions
- Maintaining adequate water pressure
- Ensuring water quality standards
- Processing payments and issuing credits.

Based on OFWAT's guidance on improving customer service and support during incidents, Veolia implements the following key practices to improve customer service during incidents:

1. Proactive and multi-channel communications:
 - Use multiple communication channels (digital and non-digital) including emails, social media, and door-to-door visits

- Provide quick, direct contact with affected customers at the start of incidents
 - Give clear timelines and regular updates throughout incidents
 - Ensure communications are empathetic, transparent and jargon-free
2. Better incident support:
 - Offer alternative water supplies that are accessible and reliable when service is disrupted
 - Provide clear information about compensation and expense claims
 - Plans are in place to organise and properly staff water stations during supply interruptions.
 - Make timely Guaranteed Standards of Service (GSS) payments
 3. Enhanced vulnerable customer support:
 - Proactively identify and support customers who need extra help
 - Maintain an accurate Priority Services Register (PSR)
 - Provide tailored support for PSR customers like water deliveries
 - Consider both permanent and temporary vulnerability
 - Ensure bottled water delivery is appropriate for those with mobility issues
 4. Post-incident follow up:
 - Provide clear end-of-incident communications
 - Offer genuine apologies and explanations if applicable
 - Process compensation claims efficiently if applicable

During 2024/25, Veolia successfully managed four unplanned interruptions due to burst mains and two low pressure incidents. The company's response teams attended all these incidents within two hours of receiving the reports. In one particular case that required an out-of-hours shutdown, Veolia provided advance notice to affected customers and restored water supply within two hours of initiating the shutdown.

5.1.2 Alternative Communication Formats

Basic services such as large print, Braille translations, and Third Party Assistance such as SignLive and LanguageLine are available for all visually- or hearing-impaired customers. Correspondence in alternative languages can also be arranged.

5.1.3 Billing Nominees

Customers are entitled to authorise a Third Party 'Account Nominee' to manage their account and handle bill payments on their behalf. This could be a relative or a trusted friend, including a care supply company or power of attorney. VWPL would inform them of the amount outstanding and the date of the payment(s) required and the Account Nominee could send the payment on the customers' behalf. Should the bill remain unpaid, any reminders would also be sent to the nominee.

If needed, VWPL will be happy to take more time to explain bills with customers and give details of advice agencies that could help in a range of situations.

5.1.4 Identification of Veolia Water Projects Ltd personnel and home visits

If requested at the time of booking an appointment, the VWPL helpdesk team can agree a password with the customer. This password will be tailored to the customer and will change with every appointment. On arrival for the planned visit, the VWPL technician or engineer will confirm

this password. In addition, if customers are unsure or still nervous about letting VWPL staff into their property, the helpdesk can provide a number to contact to verify the visit.

VWPL staff can be identified by their photographic identification card, which they will show whenever they visit.

5.1.5 Access to our Tidworth Office

If the need arises for a customer to visit our Tidworth office, the office is on the ground floor and easily accessible for everyone. In addition, disabled facilities are also available.

5.1.6 Handling Sewer Flooding Incidents

Based on the OFWAT and CCW (Nov 2024) report, Veolia has adopted the following key points for handling sewer flooding incidents:

1. Communication and Transparency:
 - Provide consistent, empathetic, and proactive communication
 - Give clear information about available support and customer rights
 - Maintain regular updates without customers having to chase
 - Ensure transparent sharing of incident records and progress
 - Establish a single point of contact and centralised communication trail
2. Support Services:
 - Respond quickly to incidents, especially when sewage enters homes
 - Provide high-quality cleanup services using appropriate equipment and sufficient time
 - Tailor support based on customer vulnerabilities and health risks
3. Financial Support:
 - Provide clear upfront information about entitled payments
 - Ensure proper payment processing under the Guaranteed Standards Scheme
 - Check that all eligible customers receive appropriate payments
4. Resolution:
 - Review cases of multiple incidents at executive level
 - Implement proactive support and preventative measures
 - Set clear time limits for resolving flooding incidents
 - Ensure problems are fixed properly the first time

In the 2024-25 reporting period, VWPL responded to four urgent sewer flooding incidents involving manhole blockages within the Inset area. These incidents resulted in external flooding only. Our team demonstrated swift response times by attending all incidents within one hour of notification on the same day.

5.2 Medium and Long Term Services

Over the next five-year period from 2025 to 2030, VWPL must accomplish a highly ambitious set of objectives. These include tackling pollution, achieving nutrient neutrality at the outflow points of its sewage treatment works, meeting increased population demand and guaranteeing adequate water resources to meet the long-term needs of everyone. Being a NAV, VWPL is subject to OFWAT's 'no

worse off' principle and is tied to tariffs and customer charges of Wessex Water Ltd and Southern Water Services Limited.

The demands of future planned works will be met through our delivery plans and reported through the appropriate mechanisms.

VWPL intends to undergo external assessments and reviews of customer satisfaction levels in order to identify areas for improvement.

6. Financial services that VWPL can provide to vulnerable customers

As customers face increasing financial pressures from the cost of living crisis, and recent increases in water and wastewater charges, VWPL recognises its vital responsibility to ensure water services remain accessible and affordable for all customers. VWPL is committed to providing support and flexible payment options to help households manage their water bills during these challenging economic times. The following section details the financial services that VWPL can offer to vulnerable customers who might be encountering water poverty.

VWPL has ambitions to:

- Increase the number of households that are supported with their bills through the social tariffs;
- Educate customers on the importance of water conservation and supplying customers with a range of water saving devices that can help reduce their annual bills;
- Expand the PSR and accommodate any vulnerable customers present within the SFAs;
- VWPL will support vulnerable customers with their applications for one of the financial services offered within the service area;
- Continue to offer customers personalised solutions that align with their individual financial situation, including flexible payment plans;
- Continue to offer the WaterSure tariff and increase the number of households that are supported by this tariff;
- Continue to offer support to low income pensioners;
- VWPL will continue to train customer-facing staff to ensure they can provide the highest level of service in difficult situations; and
- In the event of a significant leak within a household, VWPL can offer the customer a supply pipe leak allowance which will reduce the amount payable within the next billing cycle.
- VWPL is improving its customer service processes to ensure easier access to support and compensation if customers are not satisfied with the assistance provided during incidents.

6.1 Leakage Allowance

Depending on the circumstances in which a leak occurs within a customer's household, VWPL may offer a leakage allowance, which will reduce the amount the customer has to pay within the next billing cycle. Providing no other leak has occurred at the property, VWPL may be able to fix the leak in a timely manner at no additional cost to the customer.

In addition to the above, VWPL also offers advice to customers on how to manage leaks within their property.

6.2 Assist Social Tariff

VWPL offers a range of Assist Social Tariffs for eligible customers. However, in order to apply, the customer must demonstrate that they are in some level of water poverty. Figure 1 details the breakdown of the tariffs offered by VWPL.

Category of charge	1 service supplied water or wastewater	2 services supplied water and wastewater	Unit
Assist level 1	33	62	£ per annum
Assist level 2	78	118	£ per annum
Assist level 3	127	199	£ per annum
Assist level 4	179	265	£ per annum
Assist level 5	230	384	£ per annum
Assist level 6	256	505	£ per annum

Figure 1 - the breakdown of the Assist Social Tariffs (source 2025/26 Tidworth Charges Water and wastewater charges)

6.3 Low Income Pensioner Discount

Low income pensioners are on a fixed income and with the added strain of the cost of living crisis, these customers may face water poverty. Therefore, VWPL offers a discounted rate for households where VWPL is satisfied that all occupants are in receipt of pension credit or whose sole income is the minimum state pension payment.

The details of the discounted tariff are outlined in figure 2 below.

Category of charge	Water	Wastewater
Unmeasured, measured and assessed charges	20% discount from Schedule of charge	20% discount from Schedule of charge

Figure 2 - the breakdown of the low income pensioner discount (source 2025/26 Tidworth Charges Water and wastewater charges)

6.4 WaterSure Tariff

The Government has defined a category of customers as vulnerable due to the level of water poverty they could potentially experience. As a result, water companies offer a WaterSure tariff to eligible customers which reduces annual bills as it aligns payments with the average metered consumption volumes rather than the average domestic bill.

Under the conditions of this tariff, the customer bill will be capped at £605.00 (as per VWPL 2025/26 household/retail tariff charges) including standing charges (£299.00 potable water charges and £306.00 for wastewater services for customers previously in Wessex water area). However, if the eligible customer consumption is less than the referenced figure, the bill will be based upon usage instead.

6.5 Bi-annual billing of SFA properties to DIO

VWPL sends invoices directly to the DIO for SFAs within the inset area. Regular communication takes place between Veolia and the DIO regarding properties with high water consumption, leakage issues, and VWPL provides a list of the top 10 highest-consuming properties every two weeks. Through this ongoing exercise of providing billing and consumption details, the DIO has been successful in identifying and reducing water leaks, thereby reducing bills for the SFAs.

7. 'Service For All' minimum requirement

The company's approach to meeting the baseline requirements set out in the 'Service For All' vulnerability guidance is comprehensively detailed in the Appendix 1. .

7.1 Staff Training

VWPL has engaged billing and operations staff in training sessions to incorporate the requirements of Condition G. This has enabled customer service representatives and any other customer facing staff to spot the potential needs of a customer and then sensitively engage with them to agree to any additional services they may require.

The 24/7 help desk staff have received comprehensive customer care training so that they are equipped to handle a range of potential circumstances. This includes the following:

- A set of predetermined situational questions that have been created to enable staff members to understand the wider picture;
- Ability to spot a potential requirement for extra help; and
- Ability to interact with customers in a way that is inclusive with a diverse audience.

Currently the team possess knowledge about common issues and potential causes, enabling them to efficiently narrow down and address customer queries. Our staff are specially trained to handle mental health concerns and conditions affecting daily life with utmost sensitivity and understanding. By leveraging their expertise and a preemptive questioning approach, the help desk personnel can promptly identify and resolve problems, ensuring a seamless and compassionate support experience for all customers.

8. Targets and objectives to implement the vulnerability strategy

This section of the strategy will detail the measures that VWPL will implement to measure commitments and targets.

VWPL has ambitions to implement the following by 2026:

- Double the number of vulnerable customers from 19 to 38. This means within the inset, approximately 1 household out of 94 will receive additional support from VWPL;
- Receive new requests from customers annually to enrol onto the Social Assist Tariff scheme. Please note that due to the limited operational size of the inset area and the MoD customer base, VWPL is not in a position to state how many additional customer requests will be received during this period;
- Work in conjunction with the MoD to enrol tenants of SFA properties onto the PSR by October 2025;
- Increase the number of civilian customers on the PSR by October 2025;
- Implement a 'keeping in touch' scheme with vulnerable customers on the PSR annually, to ensure there have been no developments within their circumstances and that all of the additional services are still accurate and accessible;
- Expand our PSR to include care homes, food banks and healthcare providers
- Attend the annual Tidworth Armed Forces day to liaise with the largest demographic within the inset area; and
- In addition, VWPL will increase awareness of the financial support offered to vulnerable customers within the inset area. VWPL actively participated in Tidworth Town Council events in May 2024 and 2025, where our team members connected with local council representatives and residents to raise awareness about our Priority Services Register (PSR) and explain the range of support services available for vulnerable customers.

9. VWPL engagement with customers and other stakeholders in developing its strategy

The development of strategy is significantly influenced by the vital contributions of stakeholders and representatives of vulnerable customers. For VWPL, the key stakeholders include the Defence Infrastructure Organisation (DIO), Wessex Water (for the Leckford Bridge supply), Tidworth Town Council, and customer representatives.

As a small water provider, VWPL has carefully reviewed OFWAT's draft vulnerability assessment reports of larger water companies to identify and adapt relevant best practices that can be effectively scaled to serve our supply area while maintaining high standards of customer support.

Through regular quarterly meetings with Wessex Water, VWPL learns from larger water company operations and industry best practice, allowing us to adopt and adapt successful strategies for our customers' benefit.

We undertook a comprehensive mapping of the customer complaint journey, including those enrolled in our priority services, to gain a deeper understanding of their experiences.

We maintain transparent communication with CCW (the consumer watchdog) by sharing regular updates on customer complaint satisfaction metrics. Additionally, we are progressing on a membership in the Alternative Dispute Resolution (ADR) scheme, which offers mediation services to help resolve customer disputes more effectively. This collaborative approach allows us to leverage industry expertise and implement proven resolution strategies that benefit both our customers and our organisation.

10. Challenges that the company sees in implementing and monitoring of vulnerability strategy or complying with OFWAT's Service for all vulnerability guidelines

DIO SFA customers reach out to the VIVO/Pinnacle helpdesk (a company that has been awarded a contract by the DIO to provide housing maintenance services) for any issues they encounter. The VIVO/Pinnacle helpdesk team then analyses the issue and contacts Veolia if necessary. This process minimises direct interaction between Veolia and the customers. However, Veolia has provided its access information, including helpdesk and contact details, to customers and the DIO, allowing them to reach out to Veolia directly if needed.

While the existence of multiple communication channels can sometimes create difficulties in effectively tracking and resolving customer issues, VWPL maintains direct contact with the DIO and holds regular meetings to understand the problems and concerns of Service Family Accommodation (SFA) customers. To address customer issues promptly and accurately, the DIO has facilitated joint meetings involving VWPL and VIVO, fostering collaboration among the parties involved.

11 Document Control

Version	Sign-off By	Date	Comments
1.0	Fiona Winters	08/07/2024	Approved
1.1	Fiona Winters	30/06/2025	Approved