

WONDERFUL ON TAP

SEVERN

TRENT

SEVERN TRENT CONNECT VULNERABILITY STRATEGY

Service For All



INTRODUCTION

At Severn Trent Connect, 'taking care of one of life's essentials' isn't just our purpose – it's our promise to every customer, including those who may need a little extra help.

We recognise that at different times in life, any of our customers might find themselves in vulnerable circumstances. Our Vulnerability Strategy sets out how we support customers who need extra help with our sewerage services.

This strategy has been developed in line with Ofwat's Licence Condition G and the 'Service for All' guidance, ensuring we meet or exceed the standards expected of all water companies in how we treat our customers, especially the most vulnerable.



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ABOUT SEVERN TRENT CONNECT

Severn Trent Connect (ST Connect) is a New Appointee ('NAV') providing regulated sewerage services to customers in southern England.

We operate wastewater infrastructure and treatment services across multiple developments, including:

The Wellesley Development near Aldershot, Hampshire, where we provide a full sewerage service including operation of the onsite wastewater recycling centre ('WRC').

The Hoplands Development in Kent, where we have developed and operate an onsite WRC serving residential and non-household customers.

The Aurum Green Development in Basingstoke, where we manage the sewerage network and discharge wastewater into Thames Water's system under a bulk discharge arrangement (we do not own or operate a treatment facility at this location).

We are a sewerage-only company – drinking water services in our areas are provided by South East Water ('SEW'). To give our customers a seamless experience, we partner with South East Water as our retail services provider. This means SEW issues combined bills for water and sewerage, manages customer accounts, and is the main point of contact for billing and account queries.

Despite our small size and distinct operating model, ST Connect is fully accountable for the quality of service our customers receive. We adopt Ofwat's principle that NAV customers should be "no worse off" than those served by incumbent water companies, and we strive to offer improved value or service wherever possible.

For instance, we apply discretionary discounts to our sewerage charges when we provide the full collection and treatment service.

This Vulnerability Strategy applies to all customers served by ST Connect, regardless of location, and is designed to ensure that every customer who needs extra help can access appropriate support, tailored to the services we provide at their site.



OUR COMMITMENT TO CUSTOMERS WHO NEED EXTRA HELP

We are committed to delivering an excellent, inclusive service for all customers, 24 hours a day, 365 days a year.

For customers who have additional needs or find themselves in vulnerable circumstances, we provide tailored support at no extra cost.

Our commitments include:

Priority Services Register ('PSR'):

Access to a free PSR so that we know who might need extra help. Customers on the PSR receive priority attention and services (detailed below) to ensure their essential sewerage needs are met at all times.

Financial Assistance:

Support for customers who struggle to pay their bills, through social tariffs and other schemes (for example, the WaterSure programme which caps bills for eligible low-income customers with high water usage due to medical conditions or large families). Around 8% of our customers currently benefit from reduced bills, and we are working to expand help to all those who qualify.

Inclusive Communication:

Information and services are provided in a clear, accessible way. We offer multiple channels for communication and adapt to customers' preferences – whether that's sending correspondence in large print or Braille, providing language translations, or enabling a trusted third party to manage a customer's account on their behalf.

Proactive and Personalised Support:

We aim to identify customers who might need help before a crisis occurs. By working with partner organisations and sharing data (with consent), we will automatically enrol eligible customers for priority services or affordability help whenever possible, so they do not miss out on support they deserve. If something goes wrong on our network, we will proactively reach out to known vulnerable customers and make sure they are looked after during the incident.

Continuous Improvement:

We continually seek feedback and look for ways to improve our services for people who need extra help. Our strategy will evolve as we learn more about our customers' needs or as new best practices emerge. We are committed to training our team, measuring our performance, and being transparent about how we are doing.

By keeping these promises, we ensure that vulnerability is not a barrier to receiving excellent service. Customers who require extra help will be treated fairly and with empathy and will receive support that is tailored to their individual needs.

UNDERSTANDING VULNERABILITY

We use Ofwat's broad definition of vulnerability which understands vulnerability as a discrepancy between a customer's needs and the service being delivered. A customer may be in a vulnerable situation if, due to personal characteristics or life circumstances, they are not easily able to access or receive our services, potentially harming their wellbeing or finances. Vulnerability can be temporary, transient, or long-term. It can affect anyone – sometimes unexpectedly.

Examples of situations that might make a customer need extra help include:

Health conditions: chronic illness, physical disability, mental health difficulties, or cognitive impairments. For instance, a customer recovering from surgery might have mobility issues, or someone with dementia might get confused by bills.

Age-related needs: the very elderly living alone may require more support, as might families with young children (e.g., needing more consideration during any service disruption).

Life events: bereavement, job loss, divorce, or other major changes can impact a person's ability to cope or pay bills in the short term.

Financial hardship: low-income households might struggle with bills and need financial schemes or flexible payment plans.

Language or literacy barriers: customers who are not fluent in English or who have a low level of literacy might need translation or more oral communication.

Digital exclusion: those without internet access or skills might prefer paper bills or face-to-face contact.

Dependency on continuous service: while we provide sewerage (not water supply), some customers have medical or personal circumstances that make any sewer service issue especially hard to manage. For example, a customer with limited mobility or with home medical treatments needs swift assistance if there is a sewer blockage or flooding.

We understand that the profile of our communities can give clues to vulnerability needs. For example, the Wellesley development includes a mix of households, potentially including young families, some retired or military families (given Aldershot's military connections). We will use local data and insight (for example, information from Grainger PLC and/or the local council) to identify any particular vulnerability trends. We believe that every customer counts.

IDENTIFYING CUSTOMERS WHO NEED EXTRA HELP

Proactively finding and registering customers who need extra support is a top priority for us. We do not wait for customers to have a problem; we try to find and help them early. The below offers an overview of how we identify vulnerable customers:

Priority Services Register Sign-Up

We encourage all customers with any extra needs to join our PSR. Customers can sign up through multiple channels – by calling South East Water's dedicated helpline, via a simple online form, or by mailing a paper form if they prefer. We also accept PSR sign-ups through third parties (for example, a family member, caregiver, or support agency can help a customer register, with the customer's consent). We have made the registration process as straightforward as possible – it is a single step and does not require extensive evidence. Customers do not need to prove their vulnerability; if they tell us they have a need, we take them at their word and register them for appropriate support.

Data Sharing and Auto-Enrolment

To reach customers who might not know about the PSR or who hesitate to register, we leverage data-sharing partnerships. For example, with the customer's permission, we will receive referrals from South East Water, energy companies, or local authorities.

If a customer is on the energy sector's PSR or is identified by a local council as needing assistance (perhaps they receive certain disability benefits), we will automatically add them to our PSR and/or offer them our social tariff. This way, the customer does not have to apply twice or navigate multiple utilities – we take care of it for them. To ensure we respect customer privacy we are formalising data-share agreements

Partnership Outreach

We work closely with community organisations to find those who need help. Our partnership with Grainger PLC (the Wellesley master-developer) is one avenue – for instance, new residents moving into the area get an information pack, which now includes a flyer about our PSR and help that is available. We collaborate with the local council's community support teams, Citizens Advice, and housing associations in the area: these groups often can point people toward us if they mention water or sewerage concerns. We will provide these partners with easy referral routes – e.g. a direct contact point in our team – so they can help their clients get on our radar for support.



Frontline Staff Training

All customer-facing staff – whether they are SEW's contact centre agents handling our billing calls or our own field technicians working on the sewer network – are trained to recognise signs of vulnerability. For example, if a customer calls about a sewer issue and seems confused or upset, or mentions difficulty understanding, the call agent will flag that the customer might benefit from extra help (and check if they are on the PSR). Our field staff who visit homes (for inspections or repairs) carry information about the PSR and are instructed to gently suggest it if they notice, say, an elderly resident living alone who might not be registered. We have a 'no wrong door' approach: however a vulnerability is identified, a member of our team will ensure the customer is offered appropriate support and recorded in our systems.

Awareness Campaigns

Raising general awareness is key to identification. We undertake periodic awareness activities: for instance, community open days at our wastewater treatment works where we invite customers to learn about what we do and the help we offer. We also run information stands at local community events with leaflets on priority services and financial assistance.

Additionally, every year we include a 'bill insert' or newsletter for all our customers that prominently highlights our PSR and how to sign up, as well as our social tariff eligibility and how to apply. We especially do this ahead of winter or any known challenging times, to encourage people to get extra support in place.

Through these combined efforts, we aim to significantly increase the number of customers we identify and support. Our current baseline is 8% of customers on our PSR as of 2025. We believe more people could benefit – industry research suggests up to 50% of households might have some qualifying vulnerability over time – so we have set targets to reach at least 15% of our customers on the PSR by 2026, 25% by 2030, and our targets continue rising thereafter. We will monitor our progress towards these targets and adjust our tactics as needed. Every customer who needs help and is not getting it represents a gap we are determined to close.



SUPPORTING OUR CUSTOMERS – SERVICES AND ASSISTANCE

When you join our PSR or are identified as needing extra help, what can you expect? We have a range of special services and adjustments to ensure they receive the best possible service:

Priority Support During Incidents

If there is a service issue affecting your home (for example, a sewer blockage in your area, flooding, or maintenance work that might disrupt your drainage), and you are on our PSR, we will proactively contact you to explain the situation and offer any help you might need. We treat you as the highest priority for assistance. In practical terms, this means our Operational Team receives an alert if a PSR customer is in an affected area. We might deliver bespoke support such as: providing an alternative means of waste disposal if your facilities are unusable (e.g., arranging portable facilities or coordinating with the council for emergency housing if something severe like internal sewer flooding occurs), sending out tankers to bypass a fault to restore service faster for homes with vulnerable occupants, or simply having a dedicated representative check in with you regularly until things are fixed. We will tailor the response to your needs – for example, you might just need frequent updates by phone because you are anxious, while other times you might need physical assistance. And once the incident is resolved, we will follow up to make sure you are okay and, if appropriate, help with cleanup or other remediation.

Accessible Communications

We make all written and verbal communications as easy as possible to understand. Important documents (like this strategy and our Core Customer Information) are written in plain language. If you have any difficulty understanding our bills or letters, we offer to explain them or provide them in a format that suits you. For visually impaired customers, we can send bills and notices in large print, braille, or as audio recordings. If English is not your first language, we can provide translation services or translated materials upon request. Our website meets high accessibility standards, making it user-friendly for people with disabilities. We are also planning to introduce 'browsealoud'-type functionality on our site so that text can be read out for those who find that helpful. Importantly, if you would rather talk to us than read a letter, you can always call and our team will take the time to go through information with you.

Nominee Scheme and Account Support

We recognise some customers may want help managing their account. With your permission, you can set up a nominee (a family member, friend, or support worker) to handle correspondence or make inquiries on your behalf. We will then send bills or copies of bills to that nominated person if you wish, or we can simply ensure that our team will discuss account details with them as your proxy. This can be particularly useful for customers who find forms confusing or are dealing with memory issues. We also offer password protection for home visits – if any of our staff or contractors need to visit you at home, you can ask us to set a personal password which our representative will quote to you, so you have peace of mind that they are genuine.

Financial Help and Friendly Debt Management

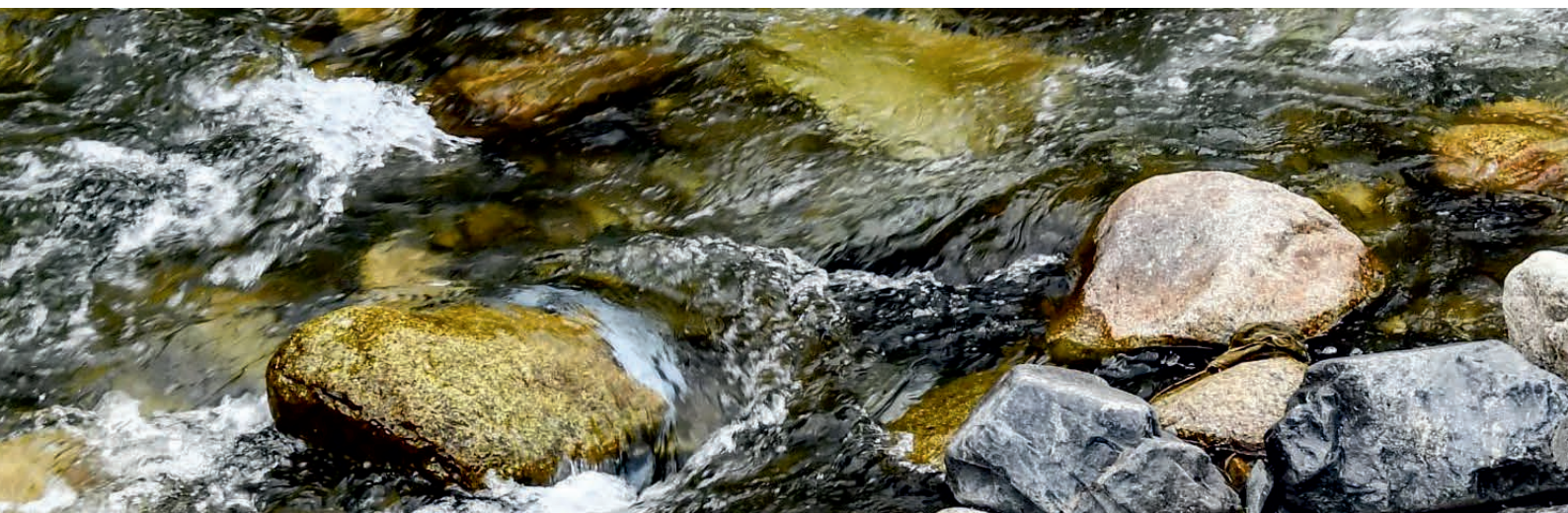
For customers facing financial difficulties, we have several forms of assistance:

Social Tariff ('Support Tariff'): We offer a discounted sewerage charge for low-income households who qualify, to make bills more affordable. In partnership with SEW (our billing / retail partner), we will be launching a refreshed Support Tariff scheme in 2025 to support more customers than ever before with their water and sewerage bills. Eligibility will be based on household income and circumstances; we work with local authorities and advice charities to identify those who might benefit.

WaterSure Program: If someone in your household has a medical condition that requires high water usage (or if you have a large family on a low income), you may qualify for WaterSure, which caps your total water/sewer bill. We make sure any eligible ST Connect customer is enrolled in WaterSure so that they do not pay above the capped amount regardless of actual usage.

Flexible Payment Plans: We understand that sometimes people struggle to pay for reasons like job loss or unexpected expenses. Our billing partner (SEW) will work with customers on a case-by-case basis to arrange more manageable payment schedules, such as weekly/fortnightly payments or payment breaks if needed. No customer in vulnerable circumstances will be chased aggressively for debt – we have a sensitive debt recovery approach that follows the industry's best practice and Ofwat's "Paying Fair" guidelines. This means we will never pursue enforcement without trying to engage with you to find an affordable solution, and we will always direct you to sources of independent help (like debt advice charities) if you are struggling.

Leakage Allowance and Repairs: (Note: since we are sewerage-only, this mainly applies to water, but if a customer's water usage spikes due to a leak, it affects their sewer charge too). We honour leakage allowances in coordination with SEW – if you had an undetected leak that caused your bill to soar, we will adjust charges, so you are not penalised unexpectedly. Using less water can lower both the water and sewerage parts of the bill, so it's a win-win for customers in hardship.



Additional Support Services

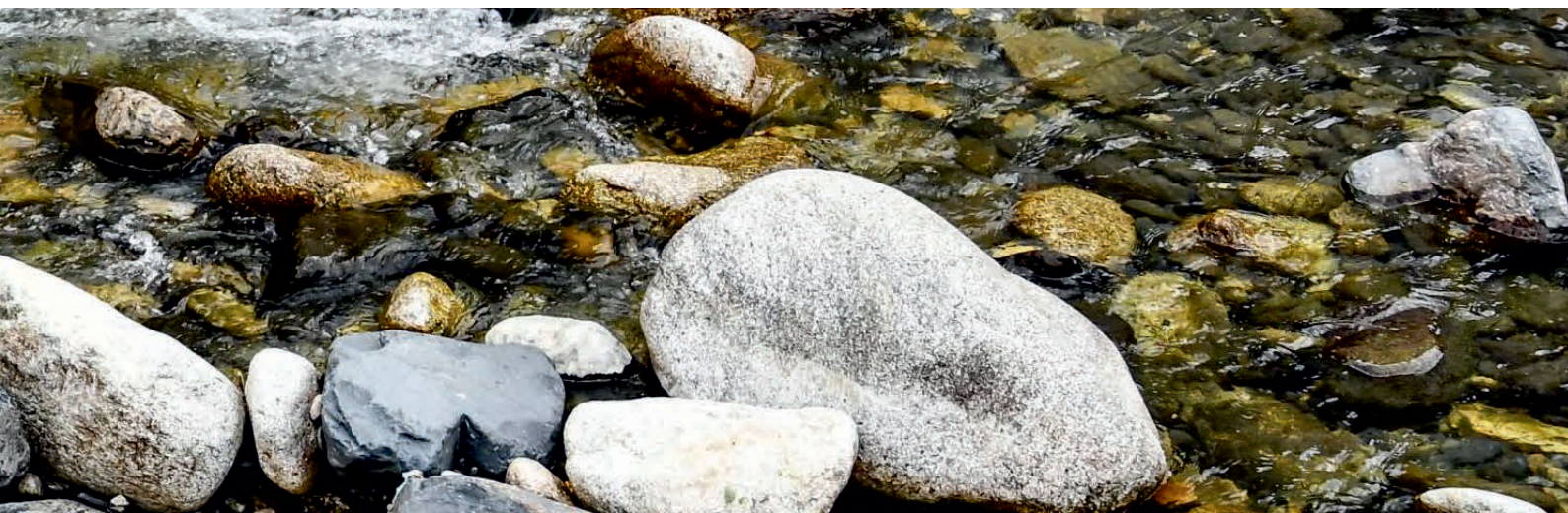
We continually look to expand our support offerings. Some examples of support we currently or plan to provide include:

Home Visits or Personalised Advice: If a customer has difficulty communicating remotely (for instance, due to a disability), we can arrange for a field representative or a specialist from SEW to visit the customer at home to sort out issues or explain services.

Temporary Facilities: In rare cases of serious service disruption (like extended outages), we will deliver practical help. For example, if there were a major sewer issue requiring us to shut off use for several hours, for a customer on the PSR we could provide access to temporary restroom facilities or hotel accommodation if needed. (We have not had such a scenario to date, but we include it in our contingency planning to ensure nobody's health or dignity is compromised.)

Priority Routing in Calls: SEW's contact centre system will flag PSR customers (with their consent) so that if you call, our agents immediately see that you may need extra care. While we do not operate a separate phone line, this flagging ensures you will not have to repeat your circumstances – our staff already know to handle your query with appropriate attention and flexibility (for instance, giving you more time on the call, not using jargon, etc.).

All these services are provided free of charge. They are part of our commitment to treat customers as individuals and ensure everyone can access our essential service. We also recognise that needs can change – so all our support is offered on a no-obligation basis. You can join or leave the PSR at any time, and using these services will not affect your consumer rights or the price you pay (except reducing it in the case of financial help).



INCLUSIVE AND ACCESSIBLE SERVICE DELIVERY

We are dedicated to making our services inclusive by design. This means we consider the diverse needs of customers when designing processes, communications, and digital services, rather than waiting to adapt after someone encounters a problem.

Some key practices in this area:

Before launching any new customer communication (like a form or major website update), we seek feedback from a range of users, including those with disabilities or literacy challenges, to ensure it is user-friendly.

Our documents follow Plain English guidelines. We avoid unnecessary technical terms, and if we must use them (like “wastewater treatment works”), we explain them. We aim for our written materials to be at a reading age that most adults in the community can understand.

We maintain accreditations and memberships that help drive inclusivity. For instance, we subscribe to the RNIB's “Visibly Better” guidance for written communication to ensure our bills are readable by those with sight loss. We are also exploring working towards the BSI 18477 / ISO 22458 Inclusive Service certification, which would externally verify that our services are accessible and inclusive. This is a longer-term goal, but it underlines our commitment to continual improvement.

Internally, we foster a culture of inclusion. We brief all employees that “vulnerability is everyone's responsibility.” Even teams that do not frequently interact with customers are made aware of how their work can impact vulnerable customers and what they should do if they spot an issue (for example, if a crew is doing noisy work at a site and they know a nearby resident on the PSR has anxiety, they are empowered to knock on the door, explain the work, and check if the person is okay or needs anything).

We ensure that no policy inadvertently penalises vulnerable customers. For example, if we had a scheme where customers need to respond to a notice to benefit from something, we double-check that approach: is it accessible to someone with memory issues? If not, we adjust it (maybe follow up with a phone call). This inclusive thinking is embedded in our procedures.

By designing with inclusion in mind, we aim to minimise the need for reactive adjustments – our service should work well for as many people as possible from the outset. But we also remain flexible to make individual accommodations whenever needed.

RESPONDING TO INCIDENTS AND EMERGENCIES

In the event of operational incidents – such as sewer blockages, flooding, or any interruption to our service – we prioritise customers in vulnerable circumstances and communicate proactively:

- We maintain an up-to-date PSR integrated with our Incident Management System. The moment we become aware of an incident (planned or unplanned) that could affect customers, we cross-reference the impacted area with PSR entries. Those identified are immediately flagged for priority action.
- Our team will reach out to PSR customers proactively. Typically, this means a phone call or text at the earliest opportunity to inform you of the issue and our expected timeline for resolution. If you prefer a particular mode of contact (noted in your PSR details), we honour that – e.g., knocking on your door if phone communication is difficult.
- During the incident, we provide regular updates to vulnerable customers. We do not wait for you to ask – we will keep you informed so you are not left wondering. We can also liaise with any nominated contacts you have (for example, informing a family member if you find it easier).
- We offer practical support as needed. For a sewer issue, this could range from assisting with cleaning up minor external flooding on your property, arranging pumping services to mitigate a backup, or even helping organise temporary accommodation if your home is severely affected and you have nowhere to safely stay (we would coordinate with local authorities in such scenarios). Fortunately, we have had zero major serviceability incidents in recent years, but we plan for worst-case scenarios to ensure readiness.
- After an incident, we follow up with vulnerable customers to check on their wellbeing and to see if any additional help or information is required. We also learn from each incident, if something did not go as smoothly as it should have for a vulnerable customer, we treat it as a learning point and adjust our process.

Our incident response protocols are regularly drilled (at least once a year we simulate an emergency) and include scenarios involving at-risk customers. We coordinate these plans closely with South East Water's emergency planning, since in many cases (like a power outage or extreme weather) both water and wastewater services could be involved.

Our aim is that in an emergency no vulnerable customer is left unsupported or unaware of what is happening. We measure our success through our feedback and outcomes – for instance, we want to hear that those customers felt informed and supported during an incident, and following an incident we survey a sample of PSR customers to get their input.

WORKING WITH PARTNERS AND THE COMMUNITY

We know we cannot achieve the necessary support needed alone. Working in partnership with other organisations is a cornerstone of our strategy:

Retail Partner (South East Water)

Our partnership with SEW is fundamental. SEW brings a robust set of vulnerability measures (they have their own comprehensive strategy covering 2025–30), and our customers benefit directly from those. We closely monitor the services SEW provides on our behalf – for example, we review the number of our customers on the PSR, the call handling performance for vulnerable customer queries, and any complaints related to vulnerability. We have regular meetings with SEW where vulnerability is a standing agenda item, ensuring that any issues are escalated and addressed. This governance framework means ST Connect maintains oversight and accountability, even though SEW handles day-to-day customer contact. Together, we make sure that support for our customers is seamless. If any customer of ours has a bad experience, we jointly investigate it to fix the root cause.

Consumer Council for Water ('CCW')

We engage with CCW (the water consumer watchdog) to seek their input on our approach. Before finalising this strategy, we shared the draft with CCW for feedback, and we will continue to consult them especially if we plan significant changes (e.g., introducing a new support scheme). They provide valuable independent insight and hold us to account on delivering our promises.

Local Authorities and Social Services

We liaise with the local council (e.g. Rushmoor Borough Council for Aldershot area and Canterbury City Council for Hoplands) where appropriate. They help to identify residents who could benefit from our services (using appropriate data consent). In turn, we support their efforts – for instance, by providing council advice centres with information on our social tariff so they can guide people struggling with utility bills. We intend to formalise a referral partnership so that, for example, if a resident in our area approaches the council for council tax support or other aid, the council will ask if they have registered for water/sewerage help and pass us the details (with permission) to follow up.

Health and Emergency Services

We will explore partnerships with local NHS facilities and emergency planners. For example, GPs or community nurses often know if a patient has needs that utility companies should be aware of (like dialysis at home). We plan to provide GP surgeries and the local hospital with PSR sign-up leaflets to share with patients who might benefit. Likewise, the local resilience forum (which prepares for civil emergencies) has access to our PSR data in case of a major incident, ensuring vulnerable people are prioritised in a multi-agency response.

Charities and Community Groups

We collaborate with charities such as Citizens Advice, Age UK, Scope (for disability), and any local armed forces charities (given the local demographic) to reach those who might need help. For instance, we have given a briefing to the local Citizens Advice advisors so they know about our support schemes and can help clients fill out forms. We recognise that trust is crucial; some customers may be more comfortable talking to a known charity or community worker than directly to 'the water company', so we make sure those intermediaries have the information needed to act on our behalf.

Cross-Utility Coordination

We support national initiatives to encourage coordination between water and energy companies. Ultimately, a customer should be able to register for priority services once and have that apply across utilities. While that is being developed industry-wide, we are doing our part locally by sharing PSR data (with consent) with electricity and gas networks. For example, if Scottish and Southern Electricity Networks (the local electricity distributor) notifies us that they have added an Aldershot customer to their PSR, we will reach out to that customer to invite them onto ours, and vice versa. This collaborative approach avoids customers having to deal with each utility separately.

By building and maintaining these partnerships, we extend the reach and effectiveness of our vulnerability support. Our presence in the community may be smaller than a regional water company, but through collaboration we can do more to ensure no one is over looked.



TRAINING OUR TEAM TO HELP YOU

Delivering on this strategy hinges on our people. We invest in training and empowering our team (and our contractors and partners' teams) to support vulnerable customers with skill and compassion:

Customer Service Training

All SEW call handlers who deal with ST Connect customers receive specialised training in dealing with customers in vulnerable circumstances. This includes how to actively listen for cues that a customer might need extra help (for example, if someone sounds distressed, confused, or mentions health issues or financial worries), how to respond with empathy, and how to record and escalate information about potential vulnerability.

Our Teams are trained on the details of our schemes (PSR, tariffs, etc.) so they can confidently explain and offer them. Role-playing exercises are used – such as handling a call from a customer with a mental health crisis or a victim of abuse who is fearful about debt – to prepare agents for real-life scenarios. We also train them on tone and pace: speaking clearly, at a comfortable speed, and checking understanding. SEW has achieved the BSI Inclusive Service Kitemark, and their call centre consistently meets high standards for customer care. ST Connect benefits from that expertise, and we enhance it with briefings specific to our sewerage context and any local nuances.

Field and Operational Staff Training

Our field operatives and contractors (the people out maintaining pumps, clearing blockages, etc.) receive training on vulnerability awareness too. This mainly relates to practical support – for instance, checking the PSR list for addresses that might be affected and knocking on these doors to inform the residents prior to shutting off a pump for maintenance. They are taught to be courteous and patient, and to report back any concerns for example, if they notice a customer living in unsanitary conditions or extreme distress, they will report it to management so we can consider further help or pass information to social services if appropriate). We conduct toolbox talks that include customer care topics, not just technical tasks.

Empathy and Flexibility

We encourage a culture where staff are empowered to go 'above and beyond' for vulnerable customers. For example, if a field worker is on site fixing an issue and a customer with mobility issues needs help moving something or understanding what is happening, the worker will take the time to adapt to the changing situation. Our performance metrics for staff include treating customers with respect and care, not just job completion speed. We celebrate examples of great service to vulnerable customers in internal communications, reinforcing positive behaviour.

Refreshers and Expert Input

Training is not one-off. We provide refresher sessions annually to keep awareness high. We also bring in external experts or customer representatives occasionally to talk to our team – hearing directly from a carer of a disabled customer about their experiences, for example, can powerfully demonstrate why patience and clarity matter. These sessions help to build empathy and awareness that behind every account number is a person with individual needs.

By ensuring our team is knowledgeable, attentive, and compassionate, we create an environment where vulnerable customers feel safe and confident to disclose their needs, knowing they will be met with understanding and help.



MONITORING, REPORTING AND CONTINUOUS IMPROVEMENT

We will monitor the effectiveness of this strategy through a set of key performance indicators and feedback loops:

Registration and Support Metrics

We track how many customers are on the PSR and receiving social tariffs, and how those numbers grow over time. Our targets (as mentioned earlier) are to increase PSR coverage to 15% of customers by 2026 and around 30% by 2030 (with interim annual milestones). We also track the percentage of customers receiving financial help. These figures will be reported to our Board and included in our annual performance reporting. If we find uptake is lower than expected, we will investigate why and adjust our approach.

Customer Satisfaction and Outcome Measures

We will measure customer satisfaction specifically for customers in vulnerable circumstances. This could be through periodic surveys or feedback calls. Our aim is to have parity of satisfaction – meaning customers who use our extra help services should be as satisfied with ST Connect's service as our average customer (in fact, we would hope even more satisfied, but parity is a minimum goal). If we discover gaps (for example if vulnerable customers report lower satisfaction), we will seek to understand the reasons and address them. We also monitor complaints, especially those that relate to how a vulnerable customer was handled. All complaints are treated seriously and reviewed by management, ensuring that lessons are learned.

Audit and Review

We plan to conduct an internal audit annually on our compliance with this vulnerability strategy and Licence Condition G obligations. This will check that PSR data is being kept up to date, staff training is completed, and commitments (like proactive contact in incidents) are being met consistently. For example the findings go to the Board and any recommendations will be implemented. Additionally, we welcome Ofwat's or CCW's oversight – if there are industry checks or comparisons, we will participate and be transparent.

Continuous Learning

This strategy is a living document. We will formally review and update it at least every two years, or sooner if needed (e.g., if Ofwat issues new guidance or if our own experience shows we should change something). We will use input from stakeholders in these reviews – for instance, we might hold a focus group with some customers on the PSR to ask how we are doing and what else they would like to see. We stay abreast of best practices by engaging in industry forums and learning from

our peers. If another water company pilots a great new idea (like a vulnerability hub or a priority services app), we will consider if that could benefit our customers. Our size allows us to be flexible; we can implement changes quickly once we decide to.

Transparency

After approval, this strategy will be published on our website and available on request in print. We will also publish a short, customer-friendly summary. We want customers and stakeholders to see what we have committed to. By being transparent, we invite our customers to hold us to account. If we fall short, we want to hear about it so we can make it right.

CONCLUSION

Severn Trent Connect is dedicated to ensuring that no customer is left behind. Whether it is a pensioner living alone who worries about what happens if her toilet stops working, a busy family struggling with bills, or someone with a disability who needs communications in a different format – we are here to help. This Vulnerability Strategy has outlined how we identify those needs, what support we provide, and how we plan to improve even further in the coming years.

Our approach recognises our unique context as a sewerage-only provider with an outsourced customer service model. By leveraging our partnership with South East Water and embedding vulnerability awareness in everything we do, we combine the strengths of a larger company's resources with the personal touch of a local provider. We believe this gives our customers the best of both worlds when it comes to support and care.

We will continue to build on this Strategy, guided by feedback from our customers and stakeholders (like Consumer Council for Water and Ofwat), and by the changing needs of society. Our commitment is that vulnerable customers will always be a priority in our decision-making – truly putting their experience at the heart of our service. In doing so, we aim to deliver a service that is not only compliant with all requirements, but more importantly, is compassionate and effective for those who need it most.

Service For All - Spreadsheet summarising compliance with Ofwat's Vulnerability Objectives

ID	Minimum Expectation	Compliance	Implementation
1.1	Companies should adapt their services to customers in line with any known extra help needs. This is especially important during times where there is increased risk of harm; for example, during incidents.	Enhanced - now exceeds minimum requirement	STC recognises that vulnerability can affect any customer at any time. Our revised strategy sets out a more proactive, inclusive, and measurable approach to identifying and meeting the needs of customers in vulnerable situations. This includes strengthened data-sharing with SEW, improved customer journeys, and a roadmap towards alignment with BSI 18477.
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Enhanced - now exceeds minimum requirement	Under our revised Vulnerability Strategy, we have committed to significantly improving how we present extra help services so that customers clearly understand what support is available and when it applies. We are working with South East Water (SEW), our retail partner, to ensure that all Priority Services Register (PSR) customers receive personalised confirmation of their registration and available support — including knock-and-wait schemes, alternative contact preferences, and guidance for service interruptions. To ensure clarity, all written and digital communications will be updated to reflect plain English principles, in line with Severn Trent Group tone-of-voice guidelines. These updates will include: Simplified PSR descriptions on our shared website and leaflets. Printed welcome packs explaining the nature of support. Information made available in large print, braille or translated formats on request. This aligns with our broader goal of becoming compliant with the BSI 18477 Inclusive Service Standard by 2026.
1.3	Companies should seek to continuously improve the service they provide to customers who need extra help. This may include finding innovative ways to design or implement services.	Enhanced - now exceeds minimum requirement	ST Connect is committed to continuous improvement in how we identify, support, and engage with customers who need extra help. Our revised 2025–2030 Vulnerability Strategy explicitly adopts a proactive and future-focused stance, recognising that vulnerability support must evolve to meet changing customer needs, expectations, and risks. Key innovation and improvement initiatives include: Introduction of a rolling annual review of our vulnerability approach through the lens of the BSI 18477 inclusive service standard. Use of data-sharing agreements with our retail partner (SEW) to proactively identify unregistered eligible customers, with targeted PSR outreach campaigns to begin in FY26. Piloting of alternative communication formats and digital accessibility tools, such as voice-assisted interfaces for visually impaired customers. Embedding service improvement cycles through formal reviews after customer incidents involving vulnerable individuals, ensuring we learn from every experience.
1.4	Companies should use a range of data to monitor the effectiveness of their extra help services, and the satisfaction levels of customers who have made such needs known.	Enhanced - now exceeds minimum requirement	Under our revised Vulnerability Strategy, we have introduced a multi-faceted approach to monitoring the effectiveness of our services, using both quantitative and qualitative data sources. Our approach includes: Customer feedback and survey data, gathered during PSR registration and through follow-up engagement points. This will include a targeted satisfaction survey for PSR customers from FY26. Operational and performance data from SEW, including PSR registration rates, call handling performance, resolution times, and incident outcomes involving vulnerable customers. Case-level reviews of service interruptions and complaints involving PSR customers to assess whether appropriate support was provided. Benchmarking satisfaction scores for PSR and non-PSR customers, using SEW data and internal analysis.

Monitoring	Challenges	Targets
Ongoing monitoring through monthly MI reports from SEW, contract performance reviews, and internal governance updates. Strategy implementation progress reviewed quarterly.	As a sewerage-only NAV, our reliance on SEW for most customer contact and data visibility presents challenges in ensuring end-to-end customer insight. These are addressed through robust contract management and regular coordination meetings.	Formalise alignment with BSI 18477 by end 2025. Customer satisfaction with vulnerability support to be tracked from 2026.
Customer understanding will be monitored using:	Our reliance on SEW for customer contact introduces complexity in ensuring consistent delivery and tone. To manage this, we have embedded vulnerability messaging into our Service Level Agreement (SLA) and now hold quarterly vulnerability alignment meetings.	100% of PSR registrations to receive written confirmation of support entitlements by December 2025.
PSR feedback mechanisms (built into registration and annual update processes).		≥90% of PSR customers to report clear understanding of available support by Q4 2026.
A targeted satisfaction survey launched in FY26, including a specific measure of perceived clarity around support entitlements.	There is also a challenge in reaching harder-to-engage customers, particularly those with low literacy or digital exclusion. This is being addressed via:	Full adoption of revised communications framework across SEW contact channels by Q2 2026.
Regular reviews of SEW scripts, onboarding materials and contact journeys to confirm adherence to STC's expectations.	Alternative format materials.	
	Proactive outreach from FY26 using community partnerships.	
Innovation and improvement activities will be tracked in our six-monthly vulnerability strategy updates to the Board.	Our scale and reliance on SEW for customer contact functions can constrain the speed at which we introduce technical innovation directly. However, we are mitigating this through:	Launch of the first targeted PSR outreach campaign by Q2 2026.
Progress against our BSI 18477 alignment roadmap will be reviewed quarterly.	Close collaboration with SEW on joint PSR initiatives.	At least one service innovation trial to be completed and reviewed annually from FY26.
Lessons learned from incidents and feedback loops will be recorded, monitored, and acted upon via our operational assurance framework.	Learning from and replicating innovation from Severn Trent Water and wider NAV comparators.	Completion of gap assessment against BSI 18477 by December 2025, with action plan developed by Q1 2026.
Quarterly PSR performance reports and satisfaction measures presented to the STC Executive.	As a sewerage-only NAV relying on a third party for customer contact, we face limitations in directly accessing or shaping some customer-facing data streams. We are mitigating this through:	Baseline PSR customer satisfaction levels established by March 2026.
Biannual vulnerability service review meetings with SEW, focusing on outcomes, incident response and customer feedback.	Formal data-sharing arrangements with SEW.	PSR satisfaction to be within ± 5% of overall customer satisfaction by March 2027.
Annual gap analysis to track improvements and missed opportunities, supporting continuous refinement of our service offer.	Joint performance reporting templates under development in 2025.	100% of PSR-related complaints to be reviewed post-resolution with learning outcomes logged.
	Agreement to isolate and analyse STC PSR customer data separately from the broader SEW dataset.	
	We also recognise the small size of our customer base may limit the statistical robustness of satisfaction data. Where this arises, we will focus on qualitative insight and individual case studies to identify and respond to service issues.	

ID	Minimum Expectation	Compliance	Implementation
2.1	Companies should interact with customers in a way that is inclusive for a diverse range of audiences. This should be underpinned by relevant insights, which may include research, engagement and accreditation.	Enhanced - now exceeds minimum requirement	Our revised Vulnerability Strategy outlines a range of actions designed to ensure interactions are both accessible and inclusive by design. Key elements include: Use of plain English in all customer-facing communications, including our Vulnerability Strategy itself. Collaboration with South East Water (SEW) to ensure shared customer communications — including bills and service updates — meet inclusive design standards and are offered in alternative formats (e.g. large print, braille, translated materials). Piloting of enhanced digital tools, such as voice-enabled content and easy-read versions of key service information. Promotion of the Priority Services Register (PSR) and associated tailored support services across multiple channels, with prominent messaging on inclusivity. A formal commitment to align with BSI 18477 (inclusive service provision) by the end of 2026. We are currently exploring external accessibility benchmarking options and potential partnership opportunities to co-design communications with individuals from under-represented or harder-to-reach groups.
2.2	Companies should offer their customers a range of ways to interact and communicate. This includes allowing customers to opt for third party billing where appropriate.	Enhanced - now exceeds minimum requirement	ST Connect customers are able to access a range of communication channels through our retail partner, South East Water (SEW), including telephone, email, webchat, and post. These channels are supported by a trained customer service team able to respond to diverse needs and preferences. When a customer's communication need is known, SEW adapts its approach accordingly. This includes: Offering alternative communication formats, such as large print, braille, audio, or translation services. Flagging known requirements within customer records to ensure future contact reflects individual needs. Providing and promoting third-party billing options, enabling trusted individuals (e.g. carers or relatives) to manage a customer's account — this includes options for informal arrangements as well as support for customers with Power of Attorney. STC has built its 2025–2030 Vulnerability Strategy around maintaining strong partnership governance with SEW, ensuring that such adjustments are not only possible, but routinely applied for customers on the Priority Services Register (PSR) or those who make individual requests. During service incidents or planned works, SEW is required to implement priority contact protocols for PSR customers, using adapted formats and contact preferences to reduce harm and ensure understanding.
2.3	Companies should consult with CCW, and engage with stakeholders and other customer representatives, when making significant changes to their proposed service offering around vulnerability.	Enhanced - now exceeds minimum requirement	Consultation and feedback process initiated with Severn Trent Customer Strategy Team. Further engagement planned with SEW customer services and local stakeholder groups in H2 2025.

Monitoring	Challenges	Targets
Annual review of customer communications for compliance with inclusive language and formatting principles.	As a sewerage-only NAV, our customer contact model relies on SEW, and therefore we must influence rather than directly control many aspects of day-to-day communication. Nonetheless, through strengthened SLAs and operational governance, we are embedding our expectations for inclusivity into all shared channels.	All core STC service communications reviewed and updated for accessibility by March 2026.
Customer satisfaction feedback on communication clarity (to be captured through PSR-specific surveys from FY26).		Joint review of SEW communications materials for STC customers by Q4 2025.
Quarterly audit of SEW-delivered communications and billing information to ensure accessibility and consistency with STC expectations.	Low levels of self-declared vulnerability and limited scale also mean engagement with underrepresented customers requires targeted outreach and third-party collaboration, which is factored into our six-month implementation plan.	Accessibility and inclusion KPIs included in SEW-STC partnership reviews from FY26 onwards.
Quarterly reviews of SEW's PSR contact protocols and incident communication logs.	ST Connect relies on SEW for customer-facing contact and billing, which limits our ability to directly intervene in real-time communications. However, our contractual arrangements and performance governance frameworks are being strengthened to ensure the right standards are maintained and evolving customer expectations are met.	Refreshed joint service protocol for third-party billing and communication preferences by Q1 2026.
Annual audit of communication channel accessibility and take-up of third-party billing arrangements.		100% of PSR customers to have recorded communication preferences by March 2027.
Tracking of complaint data and customer feedback linked to communication effectiveness	Additionally, customer awareness of third-party billing options remains relatively low — this is an area of targeted improvement from FY26.	Incident reporting to explicitly include assessment of PSR customer communications by Q2 2026.
Stakeholder feedback to be formally captured via engagement summaries. Annual review to assess responsiveness to stakeholder input.	Engaging stakeholders at NAV-scale may prove difficult. Working through our SEW partnership to ensure reach and relevance.	Engage at least three relevant stakeholder organisations annually; report consultation outcomes from 2026 onwards.

ID	Minimum Expectation	Compliance	Implementation
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Enhanced - now exceeds minimum requirement	We are enhancing our customer identification processes through improved data sharing with SEW and operational insights. In addition, we will undertake targeted outreach to help identify customers who may need additional support but have not yet been recognised.
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Enhanced - now exceeds minimum requirement	ST Connect recognises that raising awareness of the support available — particularly the Priority Services Register (PSR) — is critical to reaching customers who need extra help . Under our revised Vulnerability Strategy, we have committed to a more proactive and visible approach to awareness-building. Key activities include: Targeted awareness campaigns with South East Water (SEW), using billing inserts, emails, website banners, and SMS to inform customers about PSR eligibility and benefits. Onboarding communications for all new customers, which include PSR information and registration guidance. Joint outreach initiatives with SEW and trusted third-party organisations (e.g. local councils, housing associations, charities) to extend reach to hard-to-identify or underserved groups. Promotion of PSR and additional support services via community channels, such as libraries, community centres, and local radio. PSR messaging embedded in incident and service disruption communications, ensuring visibility at moments when support is most likely to be relevant.
3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	Enhanced - now exceeds minimum requirement	ST Connect recognises that every interaction with a customer — whether direct or through a partner — presents an opportunity to identify unmet needs . Our revised Vulnerability Strategy includes an enhanced training programme to equip our workforce with the confidence and capability to recognise and respond to signs of vulnerability. Actions include: Role-specific training modules developed for operational field teams, enabling them to sensitively identify potential needs during site visits, particularly in relation to odour or disruption complaints where customers may disclose additional circumstances. Collaboration with South East Water (SEW) to review and support the training of customer service agents handling ST Connect customers, including: recognising cues such as customer confusion, distress, or frequent contact; escalation pathways for flagging potential PSR eligibility. Inclusion of case study-based training, drawing on real-world interactions, to build empathy and confidence in how to handle conversations.
3.4	Companies should actively consider how they can reduce communication burdens on customers who need extra help; this could include establishing data sharing arrangements with partner organisations.	Enhanced - now exceeds minimum requirement	ST Connect recognises that customers requiring extra help should not be expected to repeatedly disclose sensitive information across multiple touchpoints. Our revised strategy reflects a commitment to reducing these burdens through improved collaboration and data sharing. Key actions include: Retailer-led single point of contact model: ST Connect customers receive water and wastewater services via a single billing and customer interface through South East Water (SEW). As such, customers declare extra help needs once via SEW and benefit from a seamless service experience, with data on vulnerability securely shared with ST Connect where operationally relevant (e.g. for service outages or odour complaints). Engagement with industry-wide data-sharing initiatives, including the cross-utility PSR data-sharing framework coordinated by the UK Regulators Network (UKRN), to explore interoperability with energy networks and local authorities. Information governance and data protection protocols are in place to ensure lawful and ethical handling of shared data in line with GDPR requirements. Exploring opportunities to partner with local support organisations (e.g. Age UK, Citizens Advice) who may be able to refer individuals directly onto our PSR via secure channels.

Monitoring	Challenges	Targets
Monthly data reconciliations and incident reviews with SEW. Outreach effectiveness to be assessed via response rates and PSR registration uplift.	Reaching unregistered or unengaged customers remains difficult. We are mitigating this through layered outreach campaigns and coordination with SEW's customer services.	Increase PSR registrations from 8% to 15% by 2026 and to 25% by 2030. Achieve a measurable uplift in registrations directly linked to outreach activity by Q2 2026.
Monthly tracking of PSR registration volumes and trends, broken down by channel.	As a small, sewerage-only NAV with no direct billing relationship, ST Connect relies on SEW to lead most direct customer communications. This creates some dependency in campaign design and delivery.	PSR registration rate to increase from 8% (2025 baseline) to 15% by March 2026 and 25% by March 2030.
Evaluation of campaign reach and engagement (e.g. open rates, click-throughs, conversion).	Low awareness of the PSR among certain demographics — particularly younger customers or those not self-identifying as vulnerable — continues to be a sector-wide challenge. We aim to address this through broader messaging strategies and by engaging community influencers.	Annual awareness campaign to reach at least 75% of STC households by March 2027.
Annual review of outreach effectiveness, including input from SEW and third-party partners.		Establish two local community partnerships to support outreach by March 2026.
Training completion rates tracked quarterly across ST Connect.	A significant proportion of customer-facing interactions occur via SEW, requiring ST Connect to influence rather than control training content and delivery. While cooperation with SEW is strong, embedding consistent standards across two organisations remains a live challenge.	100% of ST Connect front line staff trained in vulnerability awareness by December 2025.
Spot-check audits and feedback surveys to assess field team confidence in spotting vulnerability.		Vulnerability identification embedded in ST Connect field team induction from Q3 2025.
Review of PSR registration referral volumes from STC and SEW frontline teams.	Field-based operational staff often have time-limited customer contact, making it more difficult to identify nuanced needs. Our training therefore focuses on building confidence in noticing cues and knowing when and how to escalate concerns.	SEW to report on training coverage and PSR referral volumes as part of quarterly contract assurance by Q4 2025.
Review of data-sharing effectiveness via annual audits with SEW and internal data protection reviews.	ST Connect operates as a sewerage-only NAV with limited direct customer interactions, meaning that much of the responsibility for customer onboarding and registration lies with SEW. As a result, reliance on SEW to maintain accurate and accessible PSR records is both a strength and a constraint. We are actively working to ensure that data-sharing processes are robust and privacy-compliant.	Establish formal PSR data-sharing assurance protocol with SEW by December 2025.
Tracking the volume and source of new PSR registrations attributed to referrals or partner sharing (SEW, community organisations, etc.).		Explore feasibility of joining the cross-utility data-sharing framework by March 2026.
Customer satisfaction feedback gathered via onboarding and PSR engagement processes.	Participation in national cross-utility PSR sharing is limited by the current absence of a fully integrated platform accessible to all NAVs	Ensure 100% of relevant ST Connect operational events (e.g. odour disruption) account for PSR customers based on SEW shared data by March 2026.

ID	Minimum Expectation	Compliance	Implementation
4.1	Companies should take appropriate steps to record customers' extra help needs. These records should be held securely and in line with wider data protection requirements.	Enhanced - now exceeds minimum requirement	SEW holds and manages customer vulnerability data on STC's behalf under GDPR-compliant arrangements. Monthly reconciliations and data accuracy checks introduced under our updated strategy.
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Enhanced - now exceeds minimum requirement	SEW customer service teams have direct access to PSR data. STC operational teams receive summarised PSR insights relevant to incident or site-based activities.
4.3	Companies should consider how their records of customers' needs can be designed in a way that can help deliver wider benefits to their customers; for example, reducing communication burdens for customers through data sharing.	Enhanced - now exceeds minimum requirement	ST Connect's vulnerability data model is designed to enable effective support while minimising the need for customers to repeatedly disclose their needs. As a sewerage-only NAV, we receive and respond to customer vulnerability information recorded by South East Water (SEW), our retail partner, who maintain a comprehensive and GDPR-compliant Priority Services Register (PSR). Key actions include: Integrated data-sharing arrangement with SEW, enabling ST Connect to receive real-time PSR updates relevant to operational events (e.g. sewer blockages or service disruption). Commitment to ensuring that ST Connect's internal teams (notably Operations, and Community Engagement) can access and act on PSR data in a controlled and needs-sensitive manner. Alignment of PSR data fields and registration categories with UKRN and sector best practice to support eventual interoperability with energy and other utility providers.
4.4	In designing their approach to recording and, where relevant, sharing customer vulnerability data, companies should clearly explain to customers how their data will be used, including any choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.	Enhanced - now exceeds minimum requirement	Customer data is stored and processed by SEW under GDPR-compliant systems. STC receives anonymised or aggregated information as required.

Monitoring	Challenges	Targets
Data accuracy monitored through monthly contract reviews, PSR audit sampling, and SEW MI dashboards.	Reliance on SEW for accurate, timely updates. Close contract management and shared improvement plans mitigate risk	Achieve >95% PSR data accuracy by Q1 2026. Monthly validation checks embedded by December 2025.
Access and data use reviewed quarterly through SEW MI reports and STC operational logs.	Ensuring consistent data visibility for all relevant teams, particularly in joint or urgent scenarios.	100% of customer-facing SEW staff and STC operational responders trained on PSR usage by Q4 2025.
Biannual review of data-sharing compliance and data field alignment between ST Connect and SEW.	While SEW's systems are well developed, ST Connect remains dependent on their data sharing and accuracy. The lack of a sector-wide digital platform for NAVs and incumbents to jointly manage PSR data adds complexity. Additionally, internal access controls must strike a balance between operational effectiveness and data privacy.	Implement cross-team PSR data access protocols across ST Connect by January 2026.
Internal audit of vulnerability data access and use across teams (with focus on complaints and service operations).		Complete interoperability review and PSR alignment check against UKRN template by December 2025.
PSR customer feedback surveys to assess perception of burden and ease of access to support.		
Annual confirmation of GDPR compliance through SEW's assurance process, plus internal STC data access audits.	Limited direct access to identifiable data constrains bespoke support offers; addressed via partnership agreement improvements.	Annual GDPR compliance assurance from SEW maintained; zero data access breaches.

ID	Minimum Expectation	Compliance	Implementation
5.1	Companies should develop and maintain a vulnerability strategy setting out how they plan to support the extra help needs of their customer base.	Enhanced - now exceeds minimum requirement	Severn Trent Connect has developed a comprehensive Vulnerability Strategy (2025–2030) that sets out how we will deliver tailored extra help to customers across our sewerage-only operating areas. The strategy: Clearly maps each of Ofwat’s minimum expectations to ST Connect’s planned activities and commitments. Sets out a mix of short-, medium- and long-term goals, covering service design, data sharing, staff training, customer identification, and monitoring of effectiveness. Incorporates quantitative performance targets, including increasing Priority Services Register (PSR) coverage to 25% of customers by 2030, and increasing customer-reported understanding of our services to 90% by FY26. Was shaped using benchmarking against other water companies and NAVs, qualitative insights from Severn Trent Group’s Customer Strategy Team, and internal collaboration across operations, customer engagement, and compliance functions. Will be formally reviewed every two years and updated as needed to reflect evolving best practice, customer needs, and regulatory developments. The strategy was initially submitted in draft form to Ofwat in 2024 and is now being finalised for publication in June 2025 in accordance with Ofwat’s timeline. It will be accessible online in multiple formats and made available in hard copy upon request.
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Enhanced - now exceeds minimum requirement	ST Connect has embedded a structured governance and review framework within its Vulnerability Strategy to ensure the document remains live, relevant, and responsive to customer needs. This includes: Scheduled biennial reviews of the full strategy. Quarterly internal performance reviews to track delivery of commitments. Formal six-monthly updates to the Board and annual engagement with Group Regulation and Customer Strategy to assess continued alignment with best practice. Ongoing monitoring of changes in customer demographics, service demand, and stakeholder expectations to ensure proactive responsiveness. We are committed to continually learning from the delivery of our strategy and to updating our approach based on operational insight, customer feedback, regulatory change, and sector innovation.

Monitoring	Challenges	Targets
Progress against the strategy will be tracked through a combination of:	As a NAV with a smaller customer base and outsourced retail function, delivering a strategy that is both stretching and proportionate requires careful balancing. Achieving measurable improvement while depending on third-party systems (e.g., SEW's PSR management) introduces complexity.	Publish final strategy by 30 June 2025.
Internal delivery plans with named owners and clear milestones (reviewed quarterly).		Complete all implementation actions to meet new commitments within 6 months of Board approval.
Performance dashboards aligned to PSR growth, customer feedback, and staff training completion.	Nevertheless, ST Connect is committed to delivering a strategy befitting of a Water Company, and ensuring that vulnerability services are an embedded and measurable part of business as usual.	Achieve all Year 1 performance targets by March 2026.
Biannual Board updates and independent assurance through internal audit.		Deliver first full formal strategy review by April 2027.
Regular performance reporting embedded within business-as-usual dashboards.	Keeping the strategy proportionate to our NAV scale while maintaining group-level ambition and innovation.	First formal strategy review scheduled for April 2027.
Annual assurance reviews and independent audit every two years.	Staying agile to emerging best practice in a fast-moving sector with relatively limited internal resources.	Interim performance review and reporting pack to be submitted to the STC Board by December 2025.
A dedicated owner within the ST Connect senior team accountable for ensuring implementation and timely refresh of the strategy.	Integrating updates from external data sources and customer insight when we rely on a retail partner for day-to-day service delivery.	New insights from data sharing, audits, and customer interactions to inform adaptive improvements annually.



This Vulnerability Strategy (2025–2030) was approved by the Board of Severn Trent Connect July 2025 and will be reviewed annually. For any questions or to request this document in an alternative format, please contact us at customer@st-connect.co.uk.