



# Contents

Introduction	2
Our assurance framework	3
Process for identifying risks, strengths and weaknesses	5
Target areas	7
Assurance plans for target areas	10
Next steps	12



## Introduction

#### Who we are

We are a regional water and sewerage business serving 2.8 million customers across the south west of England including Dorset, Somerset, Bristol, most of Wiltshire and parts of Gloucestershire and Hampshire.

The region's landscape is varied, ranging from the Mendip Hills and the levels of Somerset to the cliffs of Dorset and Wiltshire's Salisbury Plain. The two coastlines have a number of popular holiday resorts such as Weston-super-Mare and Minehead on the north coast and Bournemouth, Poole and Weymouth on the south coast.

Approximately 75% of the water we supply to our customers comes from boreholes and springs and we work to maintain healthy flows in our chalk streams.

We consistently rank as the best water and sewerage company in the country against the measures our regulators use to compare us. For 2020-21, our TrustPilot ratings showed 87% of reviewers gave us a five-star rating and we once again retained our Customer Service Excellence award.

### About this document

We regularly report and publish data and information about our performance, which comes from a range of systems, assets and processes.

This document is part of the framework we use to give our customers and other stakeholders trust and confidence that the data and information we report and publish is accurate and complete. It relates to data and information we will report and publish in 2022-23 and sets out:

- our view of the risks, strengths and weaknesses in relation to the information we will report and publish; and
- the data assurance processes we will put in place to mitigate any risks or weaknesses.

#### Document structure

The remainder of this document sets out the following.

**Our assurance framework**: details of our overall approach to assessing and managing business risk and our information assurance processes.

**Process for identifying risks, strengths and weaknesses**: how we identify risks to the reliability, accuracy and completeness of the data we will provide to customers and stakeholders.

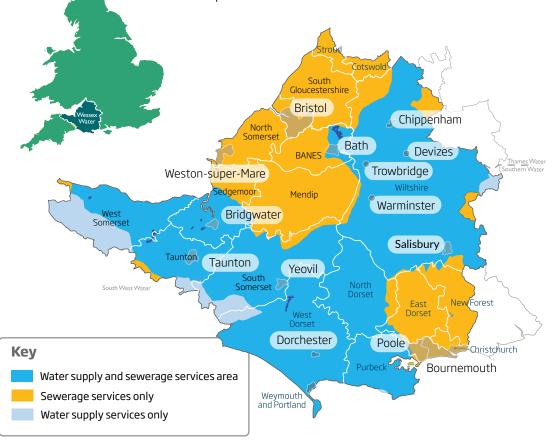
**Target areas**: progress we have made in relation to the issues we identified last year and our new target areas.

**Draft assurance plans**: the actions to manage or mitigate the weaknesses and/or risks in the target areas.

**Next steps**: How to get in touch and let us know your thoughts on this document or our approach to reporting on our performance more generally.

## Have your say

We welcome any comments you may have on this document or our approach to reporting on our performance more generally. We will use your feedback to help shape our final assurance plan, which we will publish in March 2022.



## Our assurance framework

We have a well-established assurance framework, which is led by our board. Being honest and ethical in the way we conduct our business is one of our core values.

#### Information assurance

Our overall approach to information assurance is governed by our business risk assurance map, which is published on our website **here**. This is based on three levels of defence.

**First level of defence**: director and management oversight of 'business-as-usual' risk mitigation measures covered by policies and procedures.

**Second level of defence**: functions that oversee or specialise in risk management and/or compliance, eg, Risk Management Group, Security Management Group.

**Third level of defence**: functions that provide independent assurance, eg, Internal audit, Audit & Risk Committee and external audit.

The following groups and processes are in place as part of our approach to information assurance:

### Wessex Water Services Limited (WWSL) board

It is the responsibility of the board to ensure the company meets its regulatory and legal obligations. Board ownership is key to providing a strong assurance process. The WWSL board has overall responsibility for the accuracy and completeness of the data and information which we provide or publish in our role as a water and sewerage company.

#### Audit and Risk Committee

The Audit and Risk Committee assists the board in monitoring the company's obligations in relation to financial reporting, internal control and audit, and compliance and risk management systems. Part of the committee's role is to review the company's financial statements and annual review, including the annual performance report, on behalf of the board.

#### Customer Challenge Group

The Customer Challenge Group is an independent body that plays a key role in representing the interests and needs of Wessex Water's customers. This includes:

- monitoring and reporting on Wessex Water's delivery of all aspects of its 2020 to 2025 business plan from the perspective of its customers
- providing advice and challenging Wessex Water on any plan to share outperformance with customers over and above the level approved in the business plan
- offering advice and challenging the company on policy areas such as customer engagement, customer service, affordability and tariffs.

#### External audit

Our external technical auditors (currently Mott MacDonald) provide assurance on our regulatory submissions including our annual performance report and charges schemes.

Our financial auditors (currently EY) audit the financial statements and annual report and accounts. We also gain additional specialist advice where needed.

#### Internal audit

Internal audit provides assurance to the board through the Audit and Risk Committee about the adequacy and effectiveness of internal controls and governance. The team delivers a flexible, risk-based programme of audits, which are reported to the Audit and Risk Committee.

#### Information risk register

We identify risks at a strategic, tactical and operational level. These risks are monitored in risk registers at each level.

We maintain an information risk register, which details the likelihood and impact of the data and information we report and/or publish being misreported. This covers five areas:

- regulatory submissions and publications (Ofwat)
- financial statements
- other regulatory reporting (EA, DWI, CCW, MOSL)
- information to promote competition and markets
- communication or information provided direct to customers.

### Certification process (iComply)

Our company certification process (iComply) requires employees to confirm awareness of, and compliance with, the company's rules, policies and procedures, including around data reporting where relevant to their role. The results are reported to the Audit and Risk Committee.

## Regulatory Assurance Manual

We maintain a regulatory assurance manual to help ensure we provide the appropriate level of assurance to the information we report and publish. This includes details of the annual performance report certification process and the confidence grades we use to assess the reliability and accuracy of our performance commitments reporting.

#### Annual performance report certification process

Each table in the report has a named compiler, owner and reviewer, defined as:

**Compiler** The person responsible for compilation of data or information into the

format required

**Owner** Senior manager with overall responsibility for the data and information

**Reviewer** The Director or Head of Department responsible for the area of the

business that the data or information relates to.

Compiler Owner External audit Reviewer

#### Confidence grades

We use the Ofwat confidence grades to assess the reliability and accuracy of our performance commitment reporting as part of the certification process. Where we consider the confidence grade is too low, we identify the performance commitment as a target area. Futher detail is given on pages 5 and 7. The reliability is assessed using letters A to D and there are seven accuracy bands. The definitions are shown below.

Reliability band	Description
A	Sound textual records, procedures, investigations or analysis properly documented and recognised as the best method of assessment.
В	As A, but with minor shortcomings. Examples include old assessment, some missing documentation, some reliance on unconfirmed reports, some use of extrapolation.
С	Extrapolation from limited sample for which Grade A or B data is available.
D	Unconfirmed verbal reports, cursory inspections or analysis.

Accuracy band	Accuracy to or within +/-	But outside +/-
1	1%	-
2	5%	1%
3	10%	5%
4	25%	10%
5	50%	25%
6	100%	50%
X	Accuracy outside +/- 100 %, small nu incompatible.	umbers or otherwise

## Looking forward

#### Integrated assurance

We plan to incorporate our information risk register into the governance, risk and compliance tool that we are currently implementing. The tool will deliver a holistic view of risk and assurance and maximise value from our three levels of defence model through:

- better linkage between our assurance activity and risk management functions
- integration of strategic, tactical and operational risks
- increased reporting capability, enabling more proactive risk management
- improved governance of actions
- an enhanced control framework.

#### Information Management Steering Group

In 2018 we established our information management steering group to further improve the way in which we manage and use information across Wessex Water.

The group links into our wider business risk assurance activity through the Risk Management Group and Investment Solutions Group.

The group provides a focal point for the implementation of our information management framework, illustrated below.

To enhance the data governance part of the framework, we have assigned business owners and stewards to each of our corporate systems, reinforcing a culture of ownership and responsibility for the data that is held.

## **Analytics and Business Intelligence**

The integration and analysis of data to provide meaningful insight

## Data quality management

The confidence that information is fit for purpose

# Reference and master data management

Consistency in the definition and use

## Document/content management

Management of the unstructured data environment

#### **Data governance**

On-going assurance that builds all Information Management capabilities together

#### Data security and compliance

Provides the controls to safeguard information

#### Data architecture and meta-data management

Developing a consistent approach to the flow of information

# Process for identifying risks, strengths and weaknesses

The main aim of this assessment process is to identify risks to the reliability, accuracy and completeness of the data and information we will provide to customers and stakeholders.

We assess the risks, strengths and weaknesses based on three elements: internal risk assessment, external assurance and engagement with customers and stakeholders. From this process we identify target areas. Target areas are those with specific actions we can take to improve the reliability and accuracy of our data.

Internal risk assessment

**External** assurance

Engagement with customers and stakeholders

#### Internal risk assessment

#### Information risk register

We review our information risk register and consider whether any new items should be added, if any are no longer relevant and whether the impact or likelihood have changed. We assess the likelihood of an event of misreporting data or information using the definitions shown below. The assessment takes account of existing controls.

Category	Score	Description	Likelihood of occurrence in an AMP
Very high	5	It is <b>almost certain</b> that the event will occur if the situation continues as it is	> 90%
High	4	It is <b>very likely</b> that the event will occur if the situation continues as it is	60 - 90%
Medium	3	It is <b>foreseeable</b> that circumstances may exist which result in the event occurring	40 - 60%
Low	2	It is <b>unlikely</b> that circumstances will combine to result in the event occurring	10 - 40%
Very low	1	It is <b>most unlikely</b> that the event will occur/it would require exceptional conditions	< 10 %

We assess risk impact in relation to six categories on a scale of 1 (very low) to 5 (very high). The categories are:

**3** environmental

- 1 health, safety and wellbeing 2 public health
- **4** customer service/reputation **5** legal, regulatory/compliance and contractual
- **6** financial, investor and commercial.

We combine the impact and likelihood scores to give an overall risk score of low (green), moderate (yellow), high (orange) or very high (red) as illustrated by the heatmap below.

	Very high	5					
	High	4					
⊏	Medium	3					
Lkelihood	Low	2					
pood	Very low	1					
			Very low 1	Low 2	Medium 3	High 4	Very high 5
				Impact			

We consider actions we can take to mitigate the risk for entries on the register with an overall risk score of moderate, high or very high.

## Performance commitments - reporting confidence grades and consistency

We report our performance commitments to Ofwat as part of the annual performance report and assign confidence grades to these. We aim to report all our performance commitments at a confidence grade of A3/B2 or better if possible (see page 4 - those where we have sound records and >90% accuracy or where minor shortcomings exist in the records and >95% accuracy). We consider the actions, if any, we can take to improve the reliability and/or accuracy of the data where this is below our target.

There are some performance commitments that are common for all companies. For these, Ofwat requires companies to assess the degree to which they have been able to implement the reporting guidance using a red, amber, green rating. We set out the actions we are taking to address any amber or red elements as part of our annual performance report.

#### Internal audit

We take information risks into account as part of our risk-based approach to planning the internal audit programme. The Audit and Risk Committee oversees all work from internal and external audit and monitors the progress with any actions identified. The findings and recommendations from the audits carried out are considered as part of this review.

#### Previous target areas

We consider the steps we have taken to address the target areas identified in the previous year and whether these can be removed or further actions are required.

#### External assurance

Our annual review, financial statements, charges schemes, and other ad hoc submissions are subject to external technical and/or financial assurance with regard to the data and information reported in them. The technical assurance provider (currently Mott MacDonald) and financial auditor (currently EY) report findings to the Audit and Risk Committee. We consider their audit findings and recommendations.

## Engagement with customers and stakeholders

We consider any feedback from customers or stakeholders relating to provision of data and information as part of this review.

We engage extensively with our customers and stakeholders, both in day-to-day business and for specific programmes of work. The stakeholders we engage with throughout the year include, but are not limited to, Ofwat, CCW, Drinking Water Inspectorate, Environment Agency, developers and market operator and retailers.



## Target areas

In this section we set out the areas we have identified from our assessment process where we can take actions to strengthen the data we will report and publish. The actions are detailed in the next section - Assurance plans for target areas.

#### Internal information risk assessment

### Previous target areas

In our previous information assurance plan we identified six target areas relating to provision of reliable and accurate data and information.:

Annual performance report	Charges schemes	Performance commitments
New billing system	Environment Agency submissions	Guaranteed Standards Scheme

All actions identified for delivery in 2020-21 have been completed. We have retained all as target areas as we consider there are further specific actions we can take to improve the reliability and accuracy of our data. We have incorporated performance commitments into the annual performance report target area. Further detail is given below.

## Information risk register

The matrix below shows our assessment of the 50 entries on our information risk register.

	Very high	5	0	0	0	0	0
	High	4	0	0	0	0	0
ᆮ	Medium	3	0	0	0		0
Lkelihood	Low	2	0	3	12	2	3
pood	Very low	1	0	5	13	1	10
			Very low 1	Low 2	Medium 3	High 4	Very high 5
				Impact			

There are 16 entries with moderate or high risk. Of these, there are 10 entries where the likelihood of misreporting is already at the lowest level (1). Therefore, we have not identified these as target areas.

Of the remaining six areas, five relate to submissions we make to the Environment Agency (EA) and one relates to PR24 documents.

The submissions we make to the EA are included in the EA submissions target area detailed above. We have a created a new target area for PR24 documents.

## Performance commitments - reporting confidence grades and consistency

We have identified five performance commitments to target based on their confidence grade or red/amber/green (RAG) assessment. These form part of the annual performance report target area. These are:

- risk of sewer flooding in a storm (confidence grade C4)
- sewer collapses (confidence grade B3, RAG assessment amber)
- sewer flooding risk (confidence grade B3)
- satisfactory sludge disposal (confidence grade B3)
- leakage (RAG assessment amber).

#### Internal audit

Our 2021-22 internal audit programme includes audits on bioresources, outcome delivery incentives and leakage. Internal sewer flooding was audited in 2019-20. Any findings on data and information from the audits will link to the annual performance report and EA submissions target areas.

#### External assurance

## Annual performance report

Mott MacDonald reported to the Audit and Risk Committee on their technical assurance of the 2020-21 Annual review. Their feedback included recommended or suggested actions in relation to the information and data in the following target areas:

- annual performance report
- EA submissions
- guaranteed standards scheme.

The actions are included in the relevant target areas. The internal audit programme for 2021-22 includes the guaranteed standards scheme.

## Charges schemes

We publish the following charges schemes each year:

- household charges scheme
- wholesale charges scheme

- bulk supply for new appointments and variations (NAVs) charges scheme
- new connection services charging arrangements.

All our charges schemes are subject to third level of defence, including external audit and board sign off. We publish indicative wholesale charges each year in the autumn. Following their audit of the indicative wholesale charges for 2022-23, Mott MacDonald made no material technical recommendations to the board. We will update on the findings from the audits of the other schemes as part of our final assurance plan.

# Engagement with customers and stakeholders

#### Customers

We continuously engage with our customers about our day-to-day service through multiple channels including surveys, have your say panels, feedback cards and social media.

We also seek the views of our customers and stakeholders with the help of independent research partners. This may involve focus group discussions, workshops and online surveys as well as telephone or face-to-face interviews.

The customer measure of experience (C-MeX) used across the industry is designed to compare and incentivise companies to provide an excellent customer experience for residential customers. We are pleased to remain one of the top performers in the water sector, placed first of all the water and sewerage companies for 2020-21. 94% of our customers were satisfied with our service, with 87% giving us a five-star rating on Trustpilot.

This reflects the high quality of data and information provided across a range of publications and communications.

#### Ofwat

In September 2021, Ofwat wrote to all water company CEOs challenging them to step up their efforts to support effective markets. including in relation to the quality of market data.

The letter sets out recent positive examples of incumbent companies stepping up their efforts to support effective markets and highlights additional areas where Ofwat expects to see further support, including as companies begin to prepare their business plans for PR24. We are considering what actions if any we can take to address the feedback in relation to the quality of our data and information.

We have also analysed the queries received from Ofwat on our 2020-21 annual performance report. We have identified Section 4 - Additional regulatory information of the report as a target area linked to this feedback.

We will consider any feedback we receive from Ofwat between now and March 2022 as part our final assurance plan.

#### CCW

CCW has confirmed they remain very satisfied with our engagement with them and have no concerns with the quality and timeliness of information we have provided during the year.

CCW recently published their year-end report on complaints handling by water companies – see <a href="here">here</a>. We are highlighted as a good performer across all categories and once again we have the lowest rate of written complaints of any water and sewerage company.

## Drinking Water Inspectorate (DWI)

For the 2020 water quality measures, we were in the upper quartile of water and sewerage companies for the Event Risk Index and came second for the Compliance Risk Index.

We have maintained our positive relationship with the DWI. We provide routine monthly as well as annual data submissions and continue to work with them to ensure the information that we submit is in line with regulatory requirements. We also provide a wide range of data in response to specific requests. A recent example is data on turbidity shutdown criteria at all our treatment works.

We have met regularly with our liaison inspector where discussions included progress with our programme of legal instrument notices, audit outcomes, actions

following events and regulatory expectations in response to Covid-19.

We proactively engage the DWI in discussions where guidance is not clear to ensure our policies and procedures are in line with their expectations. We continue to work closely with the DWI and Lloyd's Register Quality Assurance and are still one of just three water companies to have been awarded accreditation for drinking water safety plans.

### **Environment Agency**

The EA has not raised any significant issues about general data reporting and we continue to have an excellent relationship with them. We have had regular constructive dialogue with the EA on the provision of water and waste water quality data.

We have achieved a four-star ranking in the EA's Environmental Performance Assessment for 2020. This represents the fifth year out of six that Wessex Water has attained the highest category.

Discharge permit compliance is subject to annual audit by the EA as part of the operator monitoring assessment. In the most recent audit, our management of operator self-monitoring was rated as Excellent.

#### Developers

Developers are broadly very positive about our information provision. We regularly engage with them and address their feedback. We run sessions with developers, both in relation to our charging arrangements and to encourage dialogue about our services overall. In October we ran a series of lunchtime webinars for developers, covering a range of topics including charges, planning a new development and self-lay water supply.

Each year we publish new connection services charging arrangements and a bulk supply for new appointments and variations (NAVs) charges scheme. In setting charges for 2020-21, we made a number of changes to our process following feedback from developers including:

consulting in greater detail on the structure of our charges

- publishing indicative charges
- offering one to one session with stakeholders to discuss charges.

We followed the same process to set new connection services charging arrangements for 2021-22. We received only positive feedback and will continue to follow this process as part of our business as usual activity. Therefore, we are no longer identifying new connection services charging arrangements as a target area.

Ofwat has now established a working group to address best practice on setting NAV charges – the group includes companies, NAVs and industry bodies. We are fully engaged in this group. To avoid duplication, we have not consulted on the structure of our charges for 2022-23 or published indicative charges, as this work will be done through the industry group. We have published an open invitation letter offering stakeholders one to one sessions if there are any specific areas they wish to discuss in relation to our charges. Please see <a href="here">here</a>.

Until we know the concluding outcomes of the Ofwat working group, we continue to identify this as a target area.

The developer measure of experience (D-MeX) used across the industry is designed to compare and incentivise companies to deliver the very best experience for developer customers. We are ranked second of the water sewerage companies for D-Mex in 2020-21.

#### Market operator and retailers

With many businesses forced to close during Covid-19, this has been a challenging year for the non-household market. Emergency measures were quickly established at the start of the pandemic that enabled retailers to suppress or defer their wholesale charges in light of the uncertainty. Our wholesale services team remained focused on enhancing both the retailer and customer experience. We maintained our score of 97% in the operational performance standard, the market measure of customer service.

#### Summary

Overall, we have identified six target areas based on our assessment of risks, strengths and weaknesses of our data and information. These are:

- annual performance report
- quaranteed standards scheme
- EA submissions
- charges schemes
- new billing system
- PR24 documents.



## Assurance plans for target areas

In this section, we set out the actions we will take to strengthen the data we will report and publish in our target areas. These are in addition to the measures in our business risk assurance map.

## Annual performance report

# Section 3 - Performance commitments - reporting confidence grades and consistency

We have identified specific actions (in the table below) in relation to eight performance commitments based on the following:

- Mott MacDonald's recommendations on performance commitments in relation to their assurance of the 2020-21 annual performance report (APR).
- The performance commitments we identified from our review of confidence grades and the Ofwat RAG assessment.

### Section 4 - Additional regulatory information

We have identified section 4 of the APR as a target area linked to the queries received from Ofwat on our 2020-21 report and the significant changes proposed by Ofwat to the tables in this section for 2021-22 reporting.

In addition to the existing assurance measures, we will include additional training and awareness sessions for those responsible for completing these tables.

## Section 7 - Additional regulatory information - wastewater network plus

Following their assurance of the 2020-21 APR, Mott MacDonald suggested infiltration/sewerage network performance as an area to investigate further. This is reported in Table 7C. Therefore, we have included section 7 of the APR as a target area and will progress the action suggested.

Actions to improve confidence grades and consistency of performance commitments reporting				
Performance commitment	Action			
Risk of sewer flooding in a storm	Continue to work with WaterUK through task and finish group to review definition (currently chairing the group).			
Sewer collapses	Automate data capture when sewer repairs are raised as part of the move of below ground asset systems on to Microsoft Dynamics (planned for AMP8).			
Sewer flooding risk	Migrate internal and external flooding register on to corporate system as part of the move of below ground asset systems on to Microsoft Dynamics (planned for AMP8).			
Satisfactory sludge disposal	Review of data collection and storage in the sludge register.			
	Engage with Ofwat to align the definition with the EA's Environmental Performance Assessment measure.			
	Continue to engage in the WaterUK working group developing the proposed new definition for this measure in the EA's Environmental Performance Assessment.			
Leakage	Review our approach to calibrating mechanical abstraction meters.			
	Continue to review water balance calculations to ensure we maintain the required standard.			
Priority services for customers in vulnerable circumstances	Clarify in the method statement how Pelican and Wessex Water interact to produce the report for this performance commitment.			
Mains repairs	Implement a new procedure to verify mains repair records and the categorisation of job codes.			
Number of children/students engaged	Continue to engage with Ofwat on the detail of the definition for this measure.			

Our Internal audit team are currently reviewing the data reporting arrangements for performance commitments to provide assurance that these are appropriate and meet regulatory requirements. Reporting of leakage is also being reviewed.

We are also in discussion with Ofwat regarding the definition for two performance commitments:

- total bill reduction to customers on social tariffs the target does not reflect the bill reduction in the final business plan
- North Bristol sewer scheme Trym catchment definition to be updated to remove reference to construction of a connection at Cribbs Causeway.

### Guaranteed standards scheme

Following their external assurance of the 2020-21 data, Mott MacDonald recommended a minor update to the method statement for reporting of the guaranteed standards scheme. In addition, our internal audit team are reviewing this area as part of their ongoing assurance activity. We will implement the Mott MacDonald recommendation and any actions following the internal audit.

## **Environment Agency submissions**

In line with requirements under the Environmental Permitting Regulations, we make a number of regulatory data submissions to the EA.

We have included five submissions in this target area. These are submissions where the overall risk is moderate or high and we have identified actions we can take, or are taking, to improve the accuracy or completeness of our data.

- Final effluent flow data.
- Notification of pollution incidents from our assets.
- Event duration monitor data operation of storm overflows.
- Sludge returns.
- Final effluent disinfection sampling data UV compliance..

In addition, we have identified the Environment Agency's Environmental Performance Assessment (EPA) Supply Demand Balance Index (SDBI) and abstraction and impoundment licence compliance indicator as an area of focus following feedback from our external technical assurance provider (Mott MacDonald). We understand the EA is still developing these indicators and we will continue to work together to report against them.

### Final effluent flow data

Flow compliance is subject to annual audit by the EA as part of its operator monitoring assessment. It is also certified as part of an external audit carried out by an independent third party.

We are planning to upgrade our flow reporting app to accommodate future regulatory changes in flow monitoring. This will enhance the quality of our data in this area.

#### Pollution incidents

We required by the EA to publish our pollution incident reduction plan on a quarterly basis. This is published on our website **here**.

In 2019-20, our internal audit team carried out a review of pollution incidents. The actions identified from this review have been implemented but this remains an area of continued focus.

#### Event duration monitor data

The reduction of sewage spills to the environment is a priority area for companies to improve service to customers and support environmental improvements. In recent years we have installed a large number of event duration monitors (EDMs) on our storm overflows to record and measure these discharges.

Interest in this data from customers and stakeholders continues to grow. Information on the location and frequency of operation of our storm overflows can be found on our Drainage and waste water management plan portal on our website here.

To strengthen our data in this area, we have

implemented a reporting app and further improvements to this are planned. We also set a challenge on EDM alarms (our intelligent sewers challenge) on the Wessex Water Marketplace here. Through this we shared historical data on the waste water network in our Bath catchment.

We received 16 bids and ran a three-month trial with three potential providers. We are now beginning to roll out one of these software solutions across our network, monitoring performance in real time and alerting operational colleagues to potential blockages. We believe this will deliver an industry leading solution to managing our waste water network.

## Sludge returns

The current reporting system relies on manual information and is spreadsheet based. We are planning to carry out a review of our reporting in this area.

We will review data collection and storage in the sludge register. And, we will continue to engage in the Water UK working group that is developing the proposed new definition for this measure in the EPA.

## UV compliance

Our reporting of UV compliance data has historically used an MS Access database. We have now developed an app for reporting, which will help improve the quality of this data. This is currently being rolled out.

#### SDBI and abstraction indicators

As recommended by Mott MacDonald as part of the external audit of this submission, we will continue to engage with the EA on the definition of these measures as they move from shadow to live reporting.

## Charges schemes

### Bulk supply for NAVs charges scheme

Because of the ongoing regulatory uncertainty regarding bulk supply for NAVs charges scheme, we continue to identify this as a target area.

Alongside engaging in Ofwat's working group, we have published a letter offering stakeholders one to one sessions if there are any specific areas they wish to discuss in relation to our charges. Please see **here**.

We will reflect any feedback from the working group, or in response to the letter we have published, in the final assurance plan that we publish in March 2022.

## New billing system

As highlighted in our previous assurance plans, we are introducing a new billing system which will make our communication with customers more effective and efficient. This brings with it all the risks inherent in delivering a major IT programme, particularly one with large quantities of customer data. The information risks associated with introducing this new system include areas such as data migration, data protection, reporting and systems integration.

A full programme team is in place, with clear plans, regular reporting and its own risk and mitigation procedures. The programme is run with a strong governance process and is split into a number of workstreams, each of which also reports using the same governance procedures.

The Covid-19 pandemic has had a significant impact on the programme and to ensure the successful delivery given the risks of this kind of project it is now expected to go live in 2023.

#### PR24 documents

For PR19, a range of external third parties provided assurance across all areas of our business plan. These were detailed in the PR19 Business plan assurance map that we included in our 2018 Assurance plan.

We intend to follow a similar approach for PR24. We will provide further details as this is developed.

## Next steps

This information risks, strengths and weaknesses statement and draft assurance plan has been reviewed by the Wessex Water Audit and Risk Committee, which includes all the independent non-executive directors of the company board.

## Have your say

Please let us know your thoughts. We welcome any comments you may have on this document or our approach to reporting on our performance more generally.



## Tell us what you think

Your feedback is important to us so please get in touch. Email us at: assurance@wessexwater.co.uk

