



# **ALBION ECO LTD**

## **Vulnerability Strategy**

**Issue date: 27 June 2025**

**Next review date: 27 June 2026**

Albion Eco Limited  
Harpenden Hall  
Southdown Road  
Harpenden  
Herts.  
AL5 1TE

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## Introduction

This policy is produced to comply with Ofwat's 'Service for All'<sup>1</sup> vulnerability guidance.

Albion Eco provides water services to industrial customers based on Deeside Industrial Park in Wales. We have no household customers in our area. Much of the site is currently being redeveloped and the workforce on site is constantly changing. Once the redevelopment is fully complete, we anticipate that the population will be approximately 660<sup>2</sup>.

We have extremely close contact with our customers, with both in person visits and regular phone/online meetings and exchanges of data and information. Whilst the focus is largely on operational and financial matters, we also provide support and advice on all matters related to water supply.

Data on vulnerable staff (both staff and contractors) is managed by the customers via their internal processes. Once the site is developed and a permanent workforce is in place, we will liaise with the HR team, or relevant department, to ensure that any vulnerabilities are considered in this policy.

We do not believe that we need to consider any financial vulnerabilities as we do not have any household or small non-household customers.

Our vulnerability strategy reflects the fact that our inset is unique in that we only serve industrial customers with whom we have worked for 25 years.

## Summary of changes made from the draft strategy

Ofwat assessed company Vulnerability Strategies following the submission of draft strategies in June 2024, we have reviewed the published assessment and where appropriate we have made changes to our strategy. Albion Eco did not receive an individual assessment.

During our review of this strategy, we have taken account of the guidance listed in Ofwat's customer-focused licence condition guidance register<sup>3</sup>. We have also considered the Priority Services Register standards<sup>4</sup> issued by Ofwat. As we have no household customers, we have not made any changes based on these standards.

We have made some minor changes to this final Vulnerability Strategy including:

- Adding reference to the Welsh language version of our website
- Expanded the information on our Privacy Policy to explain that it includes a section on the Priority Services Register
- Added information on the annual review

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<sup>1</sup> <https://www.ofwat.gov.uk/regulated-companies/vulnerability/service-for-all-vulnerability-guidance/>

<sup>2</sup> Figure taken from the quoted number of jobs to be created on site, assuming each job is one person, information from the Planning Statement prepared by SLR for the Eren Group in April 2022

<sup>3</sup> [Guidance Register: Customer-focused licence condition - Ofwat](#)

<sup>4</sup> [Priority Services Register standards - Ofwat](#)

## What we are doing to meet minimum requirements

Ofwat have defined their minimum expectations in the guidance, and we address each one in the sections below.

### High standards of service and support

Our close relationship with our customers means that we have a deep understanding of their needs. We have a dedicated member of staff to liaise with the customers, backed by a team covering the full range of services required.

As non-household customers we provide data to them in various ways, and we are constantly evaluating the efficacy of these methods.

We currently provide:

- bills in electronic formats,
- policies via the customers' own systems and via our website,
- water quality advice and information on our website and
- operational data in a variety of formats.

We have processes in place to provide support in the event of an incident, including the provision of bottled water to supplement the customers' drinking water supplies. We operate a 24/7 telephone line for emergencies. Incident and emergency policies include:

- Albion Eco DOMS
- Emergency bottle water ordering process
- Minimum actions following operational or regulatory breach
- Minimum actions for failed bacteriological samples
- Network Events – notification of events
- Water Incident Management
- Embedded policies on customers' systems to aid incident response

Password access is not required for site visits as access to the site is tightly controlled, particularly during the construction phase, by the customers' security processes. All visitors are required to sign in and to be accompanied by an inducted member of staff. Albion Eco team members who attend site regularly are site inducted.

Once the site is fully developed there will be a requirement for a constant supply of water (mostly non potable) to allow for the 24/7 running of the industrial processes and staff facilities on site. Any breaks in production could have a significant economic impact, therefore we consider that the security of supply should be included in this strategy. Our inset receives bulk supplies from Dŵr Cymru for both potable and non-potable water, the volumes of water to be supplied are agreed and any planned interruptions to service are managed via our liaison meetings. Any unplanned interruptions are managed by the nominated contacts on both sides, and we keep our customers fully informed to allow for onsite storage or alternative arrangements.

Should our customers require further support with their services we would discuss this with them and agree how we can best meet their needs.

Customer satisfaction is largely demonstrated by the fact that they continue to choose us as their supplier despite having alternative options.

### Inclusive by design

All communications to our customers are tailored to their needs. Any requirements are addressed in our regular meetings.

As our site is based in Wales, there could be a need to provide information in Welsh, this has not been a requirement to date, but should the need arise, we will provide translated information. We have launched a Welsh version of our website to improve our service offering for Welsh speakers. We can also provide documentation in accessible formats at the request of the customers.

Should any additional requirements arise, we will work with our customers to provide the best possible service.

### Identifying customers

Our relationship with our customers is via key contacts in the management, operational and financial teams. As the site develops, we will build a relationship with the HR team or other relevant teams to ensure that any vulnerabilities relating to water supply are addressed in our services. The customers would be responsible for ensuring that any support we provide is directed to the staff that need it.

### Recording needs

Any sensitive data provided to us would be anonymised. Data is kept securely in a siloed area of our systems which are controlled by our security and data protection protocols and staff only have access on a need-to-know basis. We would update this data at least annually or more frequently in discussion with our customers. Our Privacy Policy contains further information on how we use customer data, there is a section dedicated to Priority Services which sets out further details of the service and your rights: [Privacy Policy – Albion Eco Limited](#).

### Vulnerability strategies

This document is the basis for our vulnerability strategy. We will continue to work closely with our customers to understand their needs and to adapt our services as they require, particularly as the workforce on site changes.

Our one-to-one relationship allows a unique understanding of our customers' operations and requirements.

## What we will do in the future

We will continue to work with our customers to ensure that we meet their needs and the needs of any vulnerable staff on site.

This strategy will be reviewed and approved annually by the Managing Director, or more frequently if there are plans for significant changes to the sites served or the composition of the customer base.



## Appendix 1

Commitments against the minimum expectations described in Ofwat's 'Service for all' vulnerability guidance

No	Minimum Expectation	Compliance	Implementation	Monitoring	Challenges	Targets
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	Compliant	<p>In the short term we will continue to communicate regularly with our non-household customers and carry out reviews of incident/emergency documents and training for staff.</p> <p>In the long term we will establish relationships with the HR team (or equivalent) of our customers to ensure that we understand the profile of the workforce.</p>	We will document meetings and requests from our customers. We will keep records of incidents and any requirements or learning points that arise.	The changing workforce on site (although the customers manage their own workforce it might mean changing requirements during the development of the site).	0 complaints
1.2	Companies should ensure that the level and nature of support available to customers is presented in a way customers can understand.	Compliant	<p>In the short term we will continue to communicate regularly with our non-household customers and update our service to meet their requirements.</p> <p>In the long term we will continue to develop relationships with the key staff/teams within our non-household customers and ensure</p>	We will document meetings and requests from our customers.	The changing workforce on site.	0 complaints

			that they have access to all of the information they require.			
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.	Compliant	<p>In the short term we will continue to communicate regularly with our non-household customers and address any requirements that they have.</p> <p>In the long term we will continue to be led by our customers and we will support them to provide services or advice to allow them to look after their staff who require extra help.</p>	We will document meetings and requests from our customers.	Our non-household customers have minimal requirements and therefore innovation will be limited.	0 complaints
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.	Compliant	In the short and long term we will be monitoring requests from our customers and any complaints.	We will document meetings and requests from our customers.	Our non-household customers have minimal requirements and therefore there will be limited data to monitor.	0 complaints Retention of non-household customers
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	Compliant	In the short term we will continue to interact with our non-household customers as they require for the	We will document meetings and requests from our customers.	We have limited scope to improve the interactions with our non-household customers.	0 complaints

	include research, engagement and accreditation.		different elements of our service.  In the long term we will review customer requirements regularly.			
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.	Compliant	In the short term we will continue to offer a range of communication options for our customers (in person, by phone, by email and in writing).  In the long term we will work with our customers to fulfil any additional requirements they have.	We will document meetings and requests from our customers.	We have limited scope to improve the range of communication methods with our non-household customers.	0 complaints
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.	Compliant	In the short term we will engage with all relevant stakeholders and our customers when making significant changes to our service offering around vulnerability.  In the long term we will engage more closely with customers' HR teams	We will document meetings and requests from our customers. We will document engagement with all relevant stakeholders.	We have limited scope to improve the service offering around vulnerability for large non-household customers.	0 complaints  Inclusion of feedback from all relevant stakeholders and customers when making significant changes to our proposed service offering around vulnerability.

			(or equivalent) to ensure that their views and requirements are accommodated for their staff.			
3.1	Companies should take active steps to identify customers who require extra help who have not yet been identified.	Compliant	<p>In the short term we will rely on the information provided to us by our key contacts within our non-household customer businesses.</p> <p>In the long term we will engage with the customers' HR teams (or equivalent) to understand the workforce.</p>	We will document meetings and requests from our customers.	The management of staff requirements sits with our customers, therefore we rely on the information they provide us.	0 complaints
3.2	Companies should take steps to proactively increase customer awareness of the extra help available to those who need it.	Compliant	<p>In the short term we will maintain customer awareness via meetings with our key contacts within our non-household customer businesses.</p> <p>In the long term we will engage with the customers' HR teams (or equivalent) to understand the workforce.</p>	We will document meetings and requests from our customers.	The management of staff requirements sits with our customers, therefore we rely on the information they provide us.	0 complaints

3.3	Companies should train their staff to spot potential requirements for extra help, even when a customer has not previously declared it.	Compliant	In short and long term, we will continue to train staff as required.	We will document meetings and requests from our customers and review our operations for any staff training opportunities.	We have limited scope to improve the service offering around vulnerability for large non-household customers.	0 complaints
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.	Compliant	In the short term we will continue to liaise with our bulk supplier and any other service providers to share any information that we are able to share.  In the long term we will work with our customers to ensure that they consider data sharing where it is appropriate.	We will document meetings and requests from our customers and communication with partner organisations.	As our customers are non-household customers they have close relationships with other suppliers.	0 complaints
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.	Compliant	In the short term we will record data on our systems in compliance with our data policies. And we will continue to update our data and security policies at least annually.  In the long term we will consider the storage of data in any	We will monitor the integrity of our systems and backups.	Any data is likely to be anonymised because it will be provided by our non-household customers and refers to their staff.	0 complaints  0 data breaches

			changes made to our systems and policies.			
4.2	Companies' records should be reviewed regularly to ensure they are up to date.	Compliant	<p>In the short term we will review any records in meetings with key contacts at our non-household customers.</p> <p>In the long term we will ensure there is a regular conversation with the customers' HR teams (or equivalent).</p>	Any customer records will be reviewed annually.	The data is likely to be anonymised because it will be provided by our non-household customer and refers to their staff.	0 complaints
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.	Compliant	<p>In the short term customer records will be held in our systems and shared as required with any partner organisations.</p> <p>In the long term if we update our systems, we will consider how we can deliver wider benefits to our customers as part of our review.</p>	We will document and action any needs that are raised by our customers.	<p>The data is likely to be anonymised because it will be provided by our non-household customers and refers to their staff.</p> <p>As our customers are non-household customers they have close relationships with other suppliers.</p>	0 complaints
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	Compliant	In the short term we will continue to publicise our Privacy Notice which is available to our customers, and we will continue to discuss	We will document our meetings with customers and decisions on data storage and sharing.	Our relationship is with non-household customers and we will only hold anonymised data	0 complaints

	choices available to them. Companies should take steps to understand how their customers who need extra help feel about the use of their data.		data storage and sharing with them.  In the long term we will liaise with the customers' HR teams (or equivalent) to ensure that our approach to storing and sharing any data that we hold is acceptable to our customers.		for end user vulnerabilities.	
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.	Compliant	A draft vulnerability strategy was produced in 2024. The final version has been published in 2025 taking into account feedback from Ofwat.	Our strategy will be reviewed annually, or more frequently if there are plans for significant changes to the sites served or the composition of the customer base.	No challenges foreseen.	Draft vulnerability strategy published by June 2024.  Final vulnerability strategy published by June 2025.  Annual reviews documented.
5.2	Companies should take steps to understand the likely underlying requirements for extra help in their areas.	Compliant	We have a unique relationship with our customers and a very clear understanding of their needs.  We will continue to work with them to ensure we provide everything they need.	We will document meetings and requests from our customers.	The workforce is constantly evolving on our site which means that needs are constantly changing.	0 complaints  0 unplanned water interruptions