

10. Assurance and track record

10.1 Key Messages

- **Comprehensive board assurance statement and robust assurance process:** The board has owned and driven the strategic direction of the plan and we have applied a rigorous assurance framework.
- **Strong track record of transparency and good governance:** We publish trusted information and have a proven track record of providing open, transparent and high-quality information about our performance to customers, stakeholders and regulators.
- **Doing the right thing, time after time:** We take a proactive approach to doing the right thing and setting standards for the sector as a responsibly managed and financially resilient company. We do the right thing for customers by helping those who would struggle to pay, leading the industry on helping customers in vulnerable situations and guaranteeing sharing of outperformance. We do the right thing financially by delivering a fully funded pension scheme, a sustainable gearing level and industry leading approaches to accountability for dividends and executive pay. We do the right thing operationally by reinvesting £930 million of outperformance during AMP6 and AMP7 to date for the long term benefit of customers, the environment and future company delivery and using markets, partnerships and innovations to deliver the best possible outcomes.
- **Delivering on service, performance commitments and ESG:** We provide high quality service to customers and have consistently achieved around 80 per cent of performance commitments during AMP7. We attract and retain investors who are committed to better environmental, social and governance practices.
- **Our plan is demonstrably credible and deliverable:** We have considered the challenges of delivering our AMP8 plan and are confident that we have a robust plan to deliver stretching targets alongside our largest ever capital programme, supported by the supply chain. The UUW Board has submitted a comprehensive assurance statement in support of the plan.

10.2 Structure

This chapter demonstrates the robust assurance approach we have taken to the plan. This, together with a strong track record, gives us confidence in our ability to deliver on our proposals to make the North West stronger, greener and healthier. In this chapter we set out our assurance framework, how this has been applied, the transparency of our reporting and our resulting confidence in the plan.

The chapter is structured as follows:

- **Section 10.3** provides a summary overview outlining the strong assurance process and strategic direction from the board, as set out in the board assurance statement.
- **Section 10.4** sets out evidence of our track record in delivering on our promises and how this gives confidence that we can deliver what we set out within our PR24 business plan submission.
- **Section 10.5** describes our approach to deliverability demonstrating our ability to raise finance, setting stretching but achievable performance commitments and building on a track record of delivery on previous programmes of work.
- **Section 10.6** details our PR24 assurance framework. It summarises the governance and accountabilities that have been developed to support this submission, including independent challenge and review, external expertise on content creation and third-party assurance.
- **Section 10.7** highlights our approach to programme, organisation and governance outlining our five-year business plans in the context of a 25-year long-term delivery strategy.

- **Section 10.8** outlines our approach to gathering submission requirements from the draft through to final methodology.
- **Section 10.9** details the thorough gateway review process we have undertaken and the appointment of a programme level assurance provider.
- **Section 10.10** this section details the independent review and challenge we have undertaken in order to create and assure our submission, giving details of external experts we have called upon.
- **Section 10.11** details our proven track record of providing transparent and high-quality information.
- **Section 10.12** conclusion of the processes which provide the board with confidence and assurance in signing the board assurance statement and,
- **Board assurance statement** our Board Assurance Statement is signed by the full UUW Board. It describes how the board has assured itself that the plan demonstrates substance and ambition across all key areas of the PR24 submission, including long term delivery strategy, affordability, cost and outcomes, risk and return and customer engagement. The Board assurance statement is provided as supplementary document *UUW11*.

Other supplementary documents supporting this chapter are:

- *UUW76 - Confidence and assurance of the submission* which describes key assurance processes and outputs,
- *UUW77 - Board leadership of the business plan* which describes how the board has engaged with and provided strategic direction throughout creation of the plan,
- *UUW79 - Statutory obligations summary* which sets out how we have met commitments in AMP7 and our approach to doing so in AMP8 and
- *UUW80* is the assurance aggregation report from external assurance providers Deloitte LLP.

We have also provided two documents which provide evidence of the deliverability of our plan. *UUW47* focuses on engineering, capital delivery and supply chain delivery. *UUW48* provides evidence on the deliverability of our plan overall.

10.3 Overview

We have presented a high quality, deliverable plan which can provide stretching outcomes and excellent value for customers and the environment. It is underpinned by a strong assurance process and strategic direction from the board, as set out in the board assurance statement. We have sought to meet or exceed each of Ofwat's requirements for a high quality plan.

Whilst this chapter and the board assurance statement (*UUW11*) provide a high level view of assurance outputs, we have also provided a more comprehensive description of the assurance undertaken against each part of our submission, in line with Ofwat's specific requirements. That supplementary document is *UUW76 - Confidence and assurance of the submission*.

We have a strong track record of performance for customers and in delivering what we say we will do. We also have an excellent track record for transparency and reporting on this performance, including but not limited to a comprehensive suite of Annual Performance Report documentation and multimedia, a robust annual assurance plan and scrutiny of this approach from the independent challenge group, YourVoice. This is in addition to the strong degree of confidence in our governance and transparency that comes from United Utilities' status as a FTSE-100 company, listed on the London Stock Exchange.

10.4 Our track record builds trust in our PR24 plan

This section provides evidence of our track record in delivering on our promises and how this gives confidence that we can deliver what we set out within our PR24 business plan submission.

10.4.1 Trust and legitimacy - board and corporate behaviour

We have a strong focus on doing business the right way, proactively leading by example, behaving responsibly and being open and honest about it. When we perform well through innovation we share this with the industry such as through the industry wide workshop we held in 2023 on reducing the number of pollution incidents. When things go wrong we learn from it and share that learning too. We demonstrated this after the Franklaw water treatment works incident in AMP6. We are a financially resilient company, with a responsible approach to how we structure our finances, both now and for the future. This has given us the ability to quickly deliver service recovery, take a long term approach to reinvesting outperformance and have the confidence to innovate and collaborate with partners and third parties. It also means that we are positioned to make AMP8 a success and provide the necessary resources for delivery.

Our focus on long-term financial resilience is evidenced by our strong balance sheet and prudent approach to financial risk management, which includes maintaining a responsible level of gearing, sector-leading credit ratings and thinking long term to deliver a well-controlled de-risked pension position. As recognised by Ofwat's most recent "Monitoring financial resilience report", UUW holds the top financial resilience categorisation with Ofwat having no specific concerns or requiring any specific company action.

We are committed to fostering trust in how we deal with our tax affairs. UUW was the second company in the FTSE100 to achieve Fair Tax Mark accreditation in 2019 and we are delighted to have earned the same recognition five years in a row, including in 2023. This independent certification recognises our commitment to paying our fair share of tax and acting in an open and transparent manner in relation to our tax affairs.

We are comprehensive in our dividend disclosures and committed early to an industry leading approach in adopting a responsible and sustainable approach to dividends in AMP7. This is evidenced through our dividend decisions, where the board has demonstrated serious consideration of the need to maintain the company's financial resilience, performance against statutory obligations, performance against the final determination for AMP7 and a range of other important safeguards. This ensured that dividend payments remained consistent with the company's delivery of services for customers and the environment. Dividend decisions have actively reflected external circumstances: no dividend payments were made during 2020/21 given the uncertainties of the COVID-19 pandemic and no outperformance beyond the base dividend was paid until strong performance against the final determination had demonstrated a responsible level of outperformance reinvestment was already occurring. UUW is in the minority of companies that in 2021/22 met Ofwat's expectations on dividend policy and application.

We take a responsible approach to our environmental commitments and obligations and reflect this in remuneration arrangements. Performance pay incentives for executive directors are aligned to our purpose and strategy helping to incentivise great customer service and the creation of long-term value for customers and other stakeholders, including the environment. These arrangements, endorsed by the board, are regularly reviewed to ensure they remain fit for purpose. For example, for the 2023/24 annual bonus scorecard we have introduced new performance measures related specifically to reducing storm overflow spills. This follows on from the introduction of two measures for 2022/23, one focusing on improving the appearance of drinking water, and the other delivering on our Better Rivers commitments. These developments build on existing remuneration links to measures such as Environmental Performance Assessment (EPA), sewer flooding, leakage, pollution, treatment works compliance, and the Compliance Risk Index. We consider that UUW's alignment to Ofwat's executive performance pay expectations has been shown to be one of the leading approaches in the industry in the development, application and clarity of our approach to executive pay.

We have a strong track record on and demonstrate long-standing commitment to corporate responsibility and environmental, social and governance (ESG) business practices. We are a purpose-driven organisation, creating long-term value in the North West. We report annually on the corporate responsibility issues shown to be of material interest to each stakeholder group and publish this on our website¹ with stakeholder value measures and targets set out to 2025. We report our performance across a range of global ESG ratings and indices to benchmark our approach against best practice and emerging sustainability challenges. We have aligned our ESG disclosure to

¹ unitedutilities.com/corporate/responsibility/our-approach/cr-performance/

the World Economic Forum and Sustainability Accounting Standards Board frameworks. How we do business is just as important as what we do. Our openness about how we do business, and the manner in which we report it, is regularly recognised externally. For example, at the Chartered Governance Institute UK and Ireland Awards 2022 we received the top awards for ‘Strategic Report of the Year’, ‘Sustainability Disclosure of the Year’, ‘Audit Disclosure of the Year’ and we were ‘highly commended’ in the ‘Annual Report of the Year (FTSE100)’ category. We were ‘highly commended’ in the ‘Reporting in the FTSE 350’ category at the PwC Building Public Trust Awards 2022. Reflecting our commitment to ESG reporting, we won the ‘Sustainability reporting of the year, EMEA’ category at the Sustainable Company Awards 2022.

As a FTSE 100 company with a strong workforce of over 5,000 employees and a major, multi-billion pound investment programme, the way we act as a business has a profound influence on the social, economic and environmental wellbeing of the North West. We are determined to play our part in a sustainable and more prosperous North West through a socially, environmentally and financially responsible approach to our day-to-day activities.

10.4.2 Performance – environment

UUW has delivered a strong environmental performance relative to peers. The company has earned the highest four-star environmental rating in the Environment Agency’s annual environmental performance assessment five times in the last eight years. We recognise the importance of performance in this area to customers and stakeholders and the high value they place on this. Therefore, we maintain an unwavering focus in this area, choosing to re-invest – notably through Dynamic Network Management (DNM) and digital networks – to further improve performance.

We are one of the sector leaders on environmental performance, as evidenced by our performance on pollution where we see the benefits of our Pollution Incident Reduction Plan (PIRP). We have recently published our second PIRP², a plan endorsed by our Board who regularly reviews pollution performance and monitors delivery of it to ensure it’s on track. We are:

- Delivering sector frontier performance on pollution incidents, having reduced overall pollution by a third since the start of the AMP;
- Leading the sector for reducing serious pollution incidents (Category 1), achieving zero in 2022/23 and in three of the last four years;
- We have the best performance on the common pollution performance commitment (Category 1 to 3) and have held this leading position for the last two years; and,
- Sharing our work with others, and learning from others, because it is important to us. In February 2023, we hosted the water sector’s first Pollution Summit to share best practice on measures being taken by companies to reduce the frequency of pollution events.

We are on track to deliver our AMP7 environmental improvement programme to improve river and bathing water quality in the North West. We are nearly 60 per cent progressed through our programme. We are proactive in helping to improve the environment and the quality of our rivers, accelerating investment, and getting a head start on future requirements because we know healthier rivers is one of the top priorities for stakeholders.

A major project in West Cumbria to improve supply resilience and address a number of environmental issues has been completed in AMP7. The project included building a state of the art water treatment works, new underground storage tanks and associated pumping stations and pipework. This has been delivered in collaboration with many stakeholders including Lake District National Park, Environment Agency, Natural England, two local authorities along with over 50 Cumbrian firms. This allows West Cumbria to be supplied with water from Thirlmere reservoir. Completion of the project removes the need to extract from Ennerdale Water (a sensitive water body), thus helping to protect this water body, and the River Ehen, which are hosts to a number of protected species, such as fresh water mussels, which are critically endangered.

² unitedutilities.com/globalassets/z_corporate-site/responsibility-pdfs/pollution-incident-reduction-plan-2023.pdf

We are investing in a ‘Better Rivers, Better North West’ plan. Supported by £230 million of AMP7 outperformance reinvestment, we are making an early start on the new requirements in the Environment Act, reducing spills and improving waterways. We have made four pledges, supported by 30 specific commitments, to deliver over the next three years, and in doing so we will kick start a river revival ahead of AMP8. We published our first progress report ‘Better Rivers Report 2023³’ on 28 April 2023 with an update on progress for all of our pledges and commitments.

Recognising the need to go further and faster on improvements to storm overflow performance we successfully sought approval to invest ahead of AMP8 on 154 overflows, meaning we are making an early start in AMP7 on performance improvements at around one third of the overflows being targeted for spill reductions by 2030.

10.4.3 Performance – drinking water quality

Providing safe clean drinking water is key to delivering a stronger, greener and healthier North West. In 2021 we implemented the Water Quality First programme, driving an improvement of over 20 per cent in taste, smell and appearance water quality contacts from customers to date. We implemented the Water Quality First programme in order to help us successfully exit DWI transformation in February 2023. Exiting the DWI’s transformation is a significant achievement and was one of Ofwat’s requirements attached to our fast-track status at PR19. We committed to doing this and achieved it.

Our Water Quality First programme was well received by the DWI – and won UUW the Water Industry Awards ‘Drinking water initiative of the year’ in 2022 – and has driven a step change in culture within UUW, which in turn has driven improvement in water quality and benefitted customers across the North West. The July 2023 DWI Chief Inspector’s Report commended our 2022 performance:

“United Utilities was taken out of transformation in early 2023. Since the transformation programme was instigated in 2016, the company has invested considerable effort, time, and money into improving its assets. This has included improvements to site-specific disinfection policies, disinfection arrangements, chemical dosing and monitoring, and taste and odour. Recently, the company achieved significant milestones with their service reservoirs notice. The Inspectorate welcome this positive action by the company in putting water quality first and all staff should be commended”.

Source: *Drinking Water 2022: The Chief Inspector’s report for drinking water in England, page 46*

We are proud of our performance with over 99.96 per cent of our regulatory water quality tests passing the exacting standards set out by the Drinking Water Inspectorate in the Water Quality Regulations each year of this AMP. Compliance at our assets is even higher at 99.98 per cent for each of the last three calendar years.

10.4.4 Performance – customer service

Our focus and targeted investment is helping us to deliver a great, efficient retail service to customers. We have a strong track record in the existing measures of experience for customers and developers. The company achieved fifth position out of 17 companies in Ofwat’s customer satisfaction measure C-MeX in both 2022/23 and 2020/21, and seventh position in 2021/22. The company also achieved fifth position in the D-MeX survey for developer customers in 2020/21, sixth in 2021/22 and eighth in 2022/23. D-Mex scores also reflect the service we offer to NAV customers, from whom we regularly receive positive feedback on the standards of service that we offer to them. These measures of experience results mean that water and wastewater customers in the North West received a great service from UUW and we forecast to earn a net financial reward across the AMP as a whole reflecting our good performance.

Our focus on giving great service to participants in the non-household retail market is evidenced by being the best performing water and sewerage company in 2022/23 for both R-Mex and Operational Performance Standards (OPS) and the second best company as at July 2023 in the Holistic Market Performance table.

We look beyond the water industry to benchmark the quality of our customer service.

³ unitedutilities.com/globalassets/documents/corporate-documents/united-utilities-better-rivers-report-2023.pdf

- We are the top water and sewerage company and fourth placed utility company – with a score that is higher than the national average – in the 2023 UK Customer Satisfaction Index (UKCSI), the independent, objective benchmark of customer satisfaction across the UK and we have been awarded the Institute for Customer Service ‘Service Mark’ with distinction.
- We also use other external metrics to assess our performance and customer expectations of what good customer service is. For example, we have again achieved the BSI accreditation (now an international standard, ISO 22458) for customer vulnerability for providing inclusive services for our most vulnerable customers. We are amongst the first water companies to have been verified as receiving this standard and, more importantly, have never received a single non-conformance or any recommendations for improvements relating to it.
- We have led industry action on affordability and vulnerability. We pioneered data sharing with the energy sector on Priority Services registers. We continuously track and monitor those we have helped with Affordability schemes and have supported over 350,000 customers so far during the AMP7 period whilst our statutory debt has remained a constant 1.8 per cent.

10.4.5 Performance – carbon

In 2021 UUW became the first UK water company to set science-based targets (SBTs) for direct and indirect emissions (Scope 1, 2 and 3) as well as being a signatory to the UN’s Race to Zero campaign. We have a strong track record of emissions reduction. Since 2005 we have achieved a circa 70 per cent reduction in our Scope 1 and 2 emissions, making strong progress towards our six carbon pledges and putting us ahead of many other water companies on emissions reduction. As a key example of our action on emissions, we now only use green electricity and have invested in new renewable self-generation facilities, generating 196 Gwh of green energy in 2022/23.

10.4.6 Performance – outcomes

We are a strong performer opposite our performance commitments, showing improvements from AMP6 to AMP7 as we focus on the measures that matter most to customers, the environment and for asset health.

This is evidenced in our delivery of performance commitments. Overall, we met or beat targets for 80 per cent of our performance commitments (PCs) in 2020/21, 78 per cent in 2021/22 and 83 per cent in 2022/23, an average performance of 80 per cent of our PCs delivered during the first three years of the AMP. This compares favourably to industry performance of around 64 per cent over the same period. Across the first three years of AMP7, UUW has earned net positive financial incentives reflecting delivery of its package of performance commitments and customer ODIs, earning a cumulative net reward of £70 million having met and exceeded stretching targets. Meanwhile, we have reinvested £500 million of outperformance for future service and delivery improvements through, for example, our Better Rivers programme and investments in Dynamic Network Management (DNM).

The targets we have met for AMP7 were not straightforward; we have had to work hard and improve our performance. We expect our targets for AMP8 to require further improvement, but our performance in AMP7 gives us confidence that we can achieve even better outcomes as a result of our comprehensive plan.

10.4.7 Taking action – collaborating with partners, sharing lessons learned

We have long term and nationally significant partnerships with organisations including the Rivers Trust, the National Trust, RSPB and Love Windermere. We have also established strong links with local authorities, including our partnership with Greater Manchester Combined Authority.

We have been working with GMCA and the Environment Agency as part of the Greater Manchester Trilateral partnership for the last four years to drive forward the environmental, development and infrastructure priorities across Greater Manchester. Endorsed by the Mayor for Greater Manchester, Andy Burnham, it has launched an integrated water management plan (IWMP), the first of its kind. The plan has been co-developed by the GMCA, Environment Agency and UUW, with the support of independent industry advisors and consultation with key stakeholders. A key aim of the partnership is to reduce flood risk, improve water quality and water efficiency, enhance natural assets and, ultimately, create more liveable, healthy places and developments. It will ensure

sustainable water management is applied across Greater Manchester to enhance water quality, manage flood risk and increase biodiversity which benefits people, place and prosperity. We are also exploring the opportunities for similar schemes with other city regions and local authorities.

Our GMCA partnership means that we are well placed to lead the industry on innovative and experimental approaches to rainwater management. This is at the heart of our Advanced WINEP proposals submitted to Ofwat and the EA in August 2023. We have made a commitment, as part of that proposal, to share learnings widely with the sector, both about what has worked well and what could be delivered differently, better or would best not be repeated.

Sharing our work with others is also an important part of our Better Rivers plan, targeting better river health in the region. In November 2022, we convened the region's first 'Future Rivers Forum'. We brought together a cross section of people and organisations including local authority representatives, North West businesses, environmental bodies, water sector regulators and local community figures to encourage greater collaboration to improve the health of the region's rivers. We followed this up later in 2022 with the first ever Environmental AGM for the North West. In February 2023, we hosted the water sector's first Pollution Summit to share best practice on measures being taken by companies to reduce the frequency of pollution events. We continue to work in partnership with the RSPB to tackle a host of different challenges at Dove Stone reservoir, Oldham. Working together we are aiming to deliver restoration to peat bogs and associated moorland edge habitats. This partnership is helping to raise awareness of and protect water quality, improve wildlife habitats and make the land more resistant to fire and floods, as well as sequestering carbon.

Building on the strong foundations of our environmental performance we have been able to promote the use of innovative solutions in our environmental programmes. This is because of the trust we have built with stakeholders and regulators about the way we work. An example of this is our work to deliver phosphorus reductions in the Manchester Ship Canal with the Manchester Ship Canal permit. Rather than an end of pipe solution at Davyhulme WwTW the required catchment phosphorus load reductions are delivered through a flexible catchment permitting approach. This innovative approach will reverse the phosphorus deterioration in the Manchester Ship Canal and will also deliver local WFD improvements in the upstream catchments. This catchment permit, is only the second case of its type to be implemented by the Environment Agency.

In the Petteril catchment we have used our catchment systems thinking approach to deliver enhanced ecosystem resilience, developing sustainable solutions for small treatment works, initiating the first trial of flexible permitting using Catchment Nutrient Balancing (CNB), piloting a nutrient trading approach and working in partnership delivered agricultural interventions across the catchment. The success of the project is clear to see with phosphorus reductions far outperforming the catchment targets. This was recognised with the project being awarded a Water Industry Forum Environmental Innovation award, recognising the environmental impact and cost savings delivered by the project. To support the wider water sector in learning from our experience in the Petteril and facilitate greater uptake of catchment and nature based solutions nationally we shared a case study and a (CNB) guidance document on the UU web site⁴.

We have a company culture of sharing the lessons which we learn. For example after the Franklaw incident we invited the whole industry to UUW so we could share our experience from start to end, seeking to ensure best practice is learned by the industry and beyond. We published a comprehensive and candid response on our experience of the significant impacts which the mid-December 2022 freeze thaw event had on the North West, detailing how we prepared, responded and reviewed the lessons learned.

10.4.8 Taking action – using innovation

We have an embedded culture of innovation, something that was recognised in our PR19 business plan submission and one of the factors that enabled us to achieve fast-track status. More on how our embedded culture of innovation has enabled us to achieve cost efficiencies and optimise our proposed solutions can be found in Chapter 8 and the supplementary document *UUW49 – Innovation framework and strategy*.

⁴ unitedutilities.com/corporate/responsibility/stakeholders/catchment-systems-thinking/beyond-water-series-alt/partnerships/transforming-the-river-petteril/

Our culture of innovation has enabled us to achieve cost efficiencies, allowing us to invest more where needed to improve performance. Our open innovation model is proving to be effective, stimulating innovation activity across our company and encouraging new ideas to be developed, tested and adopted with appropriate knowledge sharing across the sector, part of our company culture. We have reduced the total cost of innovation by accessing partnerships and matched or leveraged funding opportunities, including our strong commitment to the development, design, and operation of Ofwat's Innovation Fund and competitions. UUW is a leading company in engaging in this fund: Ofwat's 2023 report shows that we lead almost 25 per cent of the awarded funds, the highest allocation to a single water company; we are leading £28 million of investment on seven projects; and, we support a further 19 projects worth £65 million.

We are converting our PR19 innovation ambitions into real-life performance improvements through the implementation of systems thinking and DNM across our network. Increased monitoring and digitisation of our water and sewer networks is helping us to improve performance across multiple areas of our operations. Our DNM investment is helping to deliver our lowest ever levels of sewer flooding. In 2023 we reduced incidents by 46 per cent and repeat incidents by 39 per cent, partly due to the successful implementation of DNM. It has transformed the way we operate, both as an organisation and digitally. We now have a fully integrated and connected view, optimising the whole system performance in a predictive and preventative way. The data and information produced by this system means we are proactively finding and fixing issues within the sewer system before they cause an incident or have an impact on customers or the environment. This helps us to improve our performance for flooding, blockages, and pollution incidents. It also helps us to accurately capture and report performance in this area, helping us to continually improve performance.

We have started to apply the same proven technologies and ways of working in providing water services. For leakage we use the latest innovations and detection techniques, we have installed approximately 70,000 acoustic sensors across our water network, combined with advanced analytics this allows us to identify and prioritise leaks. The successful application of innovative techniques has enabled us to maintain our great performance on meeting our leakage targets for the seventeenth year in 2022/23.

We also innovate in how we utilise our financial resilience and strong credit ratings to create new opportunities to strengthen this resilience. Following the introduction of our sustainable finance framework in January 2021, we successfully launched our first sustainable bond, allowing us to raise financing based on our strong responsible business credentials.

Taken together, we have demonstrated innovation in finance, operations, a capacity to win innovation competitions, and apply innovation to new areas – all of which give us confidence in how we approach AMP8.

10.4.9 Being proactive, moving first and demonstrating sector leading responsible behaviours

We are a responsible actor in the sector, stepping up to lead the way on affordability schemes for customers, support for contestable markets, reinvesting outperformance to improve services for customers and the environment. We consistently demonstrate the right behaviours without the need for prompting or direction by regulators. We do this because it is the right thing to do and in customers' interests. We want our behaviour to be seen as an example for others to follow. Proactive actions in recent years have included:

- Anticipating at PR19 the dividend and executive pay requirements now incorporated by Ofwat into company licences;
- Exemplary performance on Ofwat's "Paying Fair" review into company provision and customer access to affordability schemes, debt management, and cash collection processes;
- Moving swiftly with high quality cases for both the Green Recovery and Accelerated Investment initiatives;
- Strong performance on Ofwat's asset management, open data and project RISE reviews;
- Thought leadership on an industry approach to assessing and managing asset health, built on our sector-leading understanding of our assets;

- Reinvesting outperformance for the long term benefit of services to customers and the environment, all whilst maintaining a responsible financial profile and offering upfront benefit sharing arrangements tied to dividend policy; and,
- Participating in COVID-19 surveillance activities alongside the EA, local authorities, UK biosecurity Agency, NHS and local universities.

We engage positively in key industry challenges, working hard to find solutions. We have led in getting DPC off the ground in the water sector. This has taken a lot of effort from both UUW and Ofwat, but we continue to see the customer benefits of this alternative method of delivery for large scale investments. Not only will customers in the North West benefit from a more resilient supply of water for many years to come, but customers in England and Wales will also benefit from the efforts we have taken to test out this new delivery method, working with Ofwat to get the process right for customers and the industry.

Current challenges that we are actively attempting to resolve include how to open up the bioresources market to competition. There are two key challenges: market development and bringing in third parties; and, the increasing environmental restrictions over how companies can dispose of sludge to land. We continue to play a key role in building a collaborative approach to understanding and starting to address the issues stemming from reducing capacity to dispose of biosolids to land (the landbank issue). In terms of developing a thriving and healthy bioresources market for treatment, we are proactively working with third parties to develop a new way of doing things, seeking to create a market opportunity for 20 per cent of our sludge treatment needs.

Affordability is another significant challenge for the industry, becoming more acute since the COVID-19 pandemic and subsequent economic turbulence. We lead the sector on innovative affordability schemes and support packages, recognising that the North West has some of the most acute levels of deprivation in the country. Supporting vulnerable customers is vital for the health of the region. Our drive to support customers with robust and effective financial support is externally recognised as leading in the utility sector. For example, at the December 2022 Utility Week Awards we took the top award in the cost-of-living category.

At PR19 we committed to using £71 million of our shareholders' money to help support vulnerable household customers. We are on track, having already provided £42.7 million in the first three years of AMP7 to help customers through our support schemes and tariffs. This is part of an overall AMP7 customer support package of circa £280 million, half of which is company funded, helping more than 350,000 households so far. To provide wider affordability support to customers, we relaunched the North West Hardship Hub, which now contains over 600 support schemes and has been opened up to all customers. We were the first water company to use Open Banking, helping us to work quickly with customers to access the best affordability solutions for them. The independent challenge group, YourVoice, has set up an affordability sub group which further challenges our approach and stimulates us to consider new initiatives for customers. Such proactive actions are an illustration of our work to help customers manage affordability issues. This is particularly pertinent during the current cost-of-living pressures.

As a responsible company we are sharing success with customers in AMP7, as we did in AMP6, by choosing to reinvest £500 million of outperformance. This reinvestment is beyond the costs assumed in the PR19 final determination and includes a shareholder contribution of £250m. We focused this reinvestment on areas where performance needs improvement: internal sewer flooding and water quality performance received additional investment for Dynamic Network Management capability and the Water Quality First programme.

10.5 Deliverability of our AMP8 plan

10.5.1 Proven experience of delivering on our plans

In 10.4 we described our track record of performance and delivery and how it gives confidence that we start AMP8 from a strong position. In supplementary *UUW79* we have set out how we have delivered our statutory obligations against our plans for AMP7 to date and how we will deliver statutory obligations from the PR24 plan. Since the beginning of AMP7 we have delivered strong performance with 100 per cent of WINEP schemes delivered on time, as reported in the EA's annual Environmental Performance Assessment.

We have put forward a credible business plan for AMP8 demonstrating our ability to raise finance, setting stretching but achievable performance commitments and building on a track record of delivery on previous programmes of work. We have a track record of making early starts on our work programmes, rather than falling behind. Even so, we recognise that for AMP8 to succeed, need to make a step change in our approach and develop appropriate plans to do this.

10.5.2 Deliverability assured by UUW Board

Recognising the step change required from AMP7 to AMP8, the company has made meaningful efforts to ensure that it can deliver the plan. Supply chain, engineering and capital delivery challenges have been met through measures such as:

- Engaging external experts including Arup, Mace and Alvarez and Marsal to challenge and support readiness programmes
- Undertaking a full capability review (covering Challenge, Capability and Capacity) and moving early to resource new PMO capability focussed on programme optimisation and risk management, alongside new directorates with specific focus in growth areas such as storm overflows and rainwater management
- Engaging early and extensively with supply chain, assessing market capacity and mitigating supply chain risks for critical goods and services
- Utilising early start and accelerated investment schemes, innovation and detailed analysis of our WINEP programme to inform and build confidence in our AMP8 approach.

Overall deliverability of the plan has been assessed by carefully considering the company's totex requirements, the approach to setting stretching but achievable performance targets – based on past performance and future improvement plans, financeability, corporate capability, resilience and track record of delivery. Further information on each of these assessments can be found in the two supplementary documents *UUW47 – Deliverability - Capital delivery and supply chain* and *UUW48 – Deliverability – Overall Plan*.

Deloitte LLP undertook a review into the company's approach to delivery preparations. In their conclusions (available in *UUW80*) Deloitte noted the structured approach the company had taken to managing deliverability risks. We are confident that we have fully addressed and responded to the specific deliverability concerns raised by Ofwat. Customers are protected against non-delivery by a variety of mechanisms, including specific PCDs.

10.6 Overview of PR24 assurance

10.6.1 Introduction to assurance framework

The provision of reliable, accurate and complete information and data is an essential part of building and maintaining trust with customers and other stakeholders who rely on the services we provide. Given our position as a provider of essential public services, we have a responsibility to provide accurate and easily accessible regulatory information. We pride ourselves on publishing trusted information and have a proven track record of providing open, transparent and high-quality regulatory information. We publish a description of our corporate assurance framework on our website⁵. This provides an overview of how we apply our risk-based approach to ensure that reported data and regulatory information receives the appropriate level of challenge, review, and approval. Wherever possible, we use this approach across all regulatory submissions and reports, including this PR24 submission and our annual performance reporting. The main assurance areas are summarised below.

10.6.2 Measurement and data capture

The data and information required for this submission has been developed through routine and often long standing operational and management practices and processes, as well as by gathering further specific information to support the PR24 business plan.

⁵ unitedutilities.com/corporate/aboutus/performance/assuring-our-performance-2020-25

10.6.3 Risk-based assurance

We have adopted a structured risk assessment approach to underpin the governance and assurance processes supporting this plan. The overall combined risk rating is used to help to determine the level of governance and assurance that is applied to the elements of the plan.

As the level of risk increases the governance and assurance applied also increases and ensures that key risks are escalated up to board level where necessary. This means that the management, control and reporting of any risks and resulting actions identified through the process are proportionate to the level of risk. We have adopted a well-established 'three lines of assurance' framework. This was reviewed by Deloitte in May 2023 and found to be fit for purpose. The three lines of assurance are:

- **First line:** management has accountability for developing and maintaining sound processes, systems, and controls;
- **Second line:** the Strategy, Policy, and Regulation and/or Finance teams, where applicable, have accountability for providing the framework and governance for our submission. Our Corporate Audit team undertake targeted reviews of key areas of the submission; and,
- **Third line:** Independent audit and assurance activities are undertaken by specialist external auditors.

In addition to risk-based assurance outlined above, we also employ an external assurance provider who is able to offer us aggregate assurance at a programme level. This covers programme management, controls, and governance. This work assesses the approach and processes adopted by UUW in order to deliver a high-quality business plan, providing an independent assessment of how UUW has managed the risks affecting the quality of the submission. Other supporting work includes engaging with industry and subject matter experts (SMEs) to offer opinion and advice on how best to address certain requirements. We have a specific assurance procurement framework allowing us to draw on different experts in an efficient and targeted manner as and when required.

For this plan we have tailored this risk assessment to ensure it is fit for purpose and reflects the broad nature of the business plan. This has been externally assured as part of the aggregate assurance activity. Each workstream has been risk assessed at an appropriate deliverable level. The output of this is a risk level based upon impact and probability, which ultimately defines the level of assurance applied. As part of this process, first, second, and third-line resources are allocated accordingly. The risk assessment process is reviewed at regular intervals throughout the programme life cycle to reflect any changes in requirements or any emerging risks or issues. An example of our risk assessment can be seen in Figure 10-1 below.

Figure 10-1: Our future plan risk assessment example

Theme	Deliverable	Nature of information	Product lead	Product owner	Impact	Probability	Controls	Risk level	Assurance requirement
Chapter 7	Value assessment tool	Input data	Head of Asset Lifecycle and Systems	Decision Support Manager	High	High	Strong	High	1st, 2nd, 3rd line
Chapter 6	Working in partnership	Methodology	Head of Long Term Strategy	Partnership Development Manager	Medium	Medium	Strong	Medium	1st, 2nd line

Each deliverable is scored according to impact and probability. The overall impact score is determined by the highest score in the categories. The inherent probability is then assessed in line with the control scores in place. The output of these results in a risk level, which then determines the level of assurance required based upon these combinations. In the example above, our model assessment on water poverty will be subject to first, second and independent third-line assurance. Over 250 individual risk assessments were completed in preparation for this submission.

10.6.4 Governance and accountability

We are committed to the very highest standards of corporate governance with defined accountabilities from the UUW board level cascaded into our operational governance and review processes. We apply the principles and report against the provisions of the 2018 UK Corporate Governance Code. This ensures we have a robust corporate framework. In addition to this we have an established board committee with delegated responsibility to oversee compliance with regulatory and statutory reporting requirements and to be kept abreast of any changes to the requirements. The board has been fully engaged in the development to the business plan, as set out in supplementary document *UUW77 - Board leadership of the business plan*.

10.6.5 Independent challenge and review

The YourVoice panel monitors and challenges us on the delivery of our business plan, reviews our annual reporting and scrutinises our customer engagement used in the development of our business plan. Further information can be found in section 10.10.

10.6.6 Building trust and confidence in our plan

We have sought to develop and publish a high-quality business plan. This has been supported by robust and comprehensive processes that, where relevant, have been developed alongside high-quality independent specialists, to provide confidence that the plan contains stretching performance targets and efficient expenditure projections and is also operationally and financially deliverable. We have then applied the comprehensive assurance framework as described above, to ensure that the plan has appropriately addressed the expectations of a high-quality plan as set out within the Ofwat PR24 methodology⁶.

10.7 Programme organisation and control

10.7.1 Long term planning business requirements and meeting regulatory requirements

Both long term (25 year) and cyclical (5 year) planning are activities that UUW has long been engaged in and which underpin our approach to delivering strong outcomes for stakeholders. For PR24, Ofwat has specifically identified the need for water companies to set out their five-year business plans in the context of their 25-year long-term delivery strategy, showing how companies are aiming to address long-term challenges within the sector. Our “Future Plan” programme was established as an overarching programme to bring together and effectively manage the strategic planning frameworks and statutory environmental projects under one programme office (PMO).

The alignment of price review (PR14), drainage and wastewater management plans (DWMP), water resources management plans (WRMP), water industry national environmental programme (WINEP) and Drinking Water Inspectorate (DWI) requirements is designed to deliver an integrated long-term strategy and ensure consistency between the overall programme and the individual projects. Where possible, common approaches to planning, data and assurance are used to mitigate risks of strategic misalignment or inconsistent data and/or information.

10.7.2 Programme governance

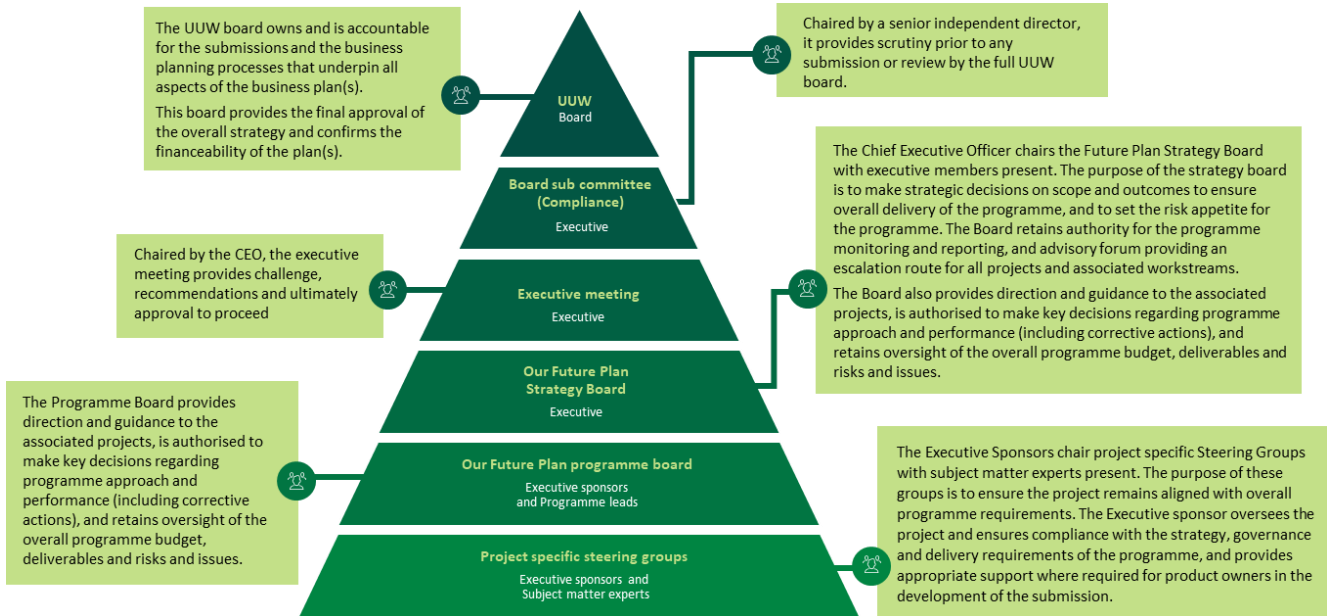
Programme governance has been established to provide a framework of authority and accountability that defines and monitors products for the programme and individual projects. It provides reporting and control activities to verify that the sponsor and key stakeholders can monitor progress. This is managed through ascending governance groups: Project Steering Group, Our Future Plan Programme Board, Our Future Plan Strategy Board, Executive committee, board subcommittees (where relevant), and the UUW Board, as shown in *Figure 10-2* below.

The corporate assurance framework is applied throughout the programme. Fundamental to this is that those responsible for delivering elements of the plan are also responsible for ensuring that assurance requirements are properly assessed and applied, reflecting the key risks that might impact the quality of the final outputs. This is then appropriately assured as defined by the output of the risk based assessment. As identified in the RACI, the

⁶ ofwat.gov.uk/publication/creating-tomorrow-together-our-final-methodology-for-pr24/

Chief Executive Officer, as delegated by the board, is accountable for the assurance framework and the relevant executive director is accountable for the assurance activity. This enables us to publish information that can be trusted and provides confidence to customers and stakeholders.

Figure 10-2: Our plan governance structure



Through the governance and controls established, aligned to the robust application of our assurance framework, we are confident that we have produced a submission which is high quality, ambitious, stretching but deliverable. Regular board engagement has ensured the plan has been shaped in line with its vision. The board has been supported with credible evidence and proof points through the use of internal subject matter experts and external advisers, including in support of its assurance statement.

10.8 Meeting submission requirements

A strong programme management office (PMO) was established with experience of managing a large set of requirements. From draft through to final methodology a process was in place to fully capture all regulatory and business requirements for the submission; this was refreshed and updated over time. This further gave confidence that our submission meets the regulatory requirements such as those set out by Ofwat in the final methodology and relevant guidance material. Each requirement has an executive sponsor, who is required to confirm that their work and the supporting assurance actions had been fully completed, to support the board decision to sign the Board Assurance Statement. Closed actions are subject to aggregate assurance to ensure satisfactory completion.

10.9 Review, challenge and approvals process

As outlined above, we have set up a strong programme management office with the leadership, skills, and knowledge to create a robust, credible, and deliverable business plan. Governance and assurance is at the heart of this plan with a dedicated assurance workstream.

Deloitte LLP was appointed as our aggregate assurance provider. In this role it undertook an initial review of the programme controls and governance, and then two further programme wide assurance aggregation reviews in May 2023 and August 2023. Following this Deloitte summarised:

“UUW has demonstrated throughout the development of the Price Review submission that it has robust and effective programme management processes to assist with the successful delivery of the ‘Our Future Plan’ programme, including the PR24 business plan submission.”

Source: Deloitte, Price Review 2024: Assurance Aggregation – Overall Summary Report: Final, 25 Sept 2023.

Internal gateway reviews (skeleton, bronze, silver and gold) were held throughout the development of the business plan and were a combination of reviews by executive, senior management, and peer reviews. The reviews assessed progress and the quality of the deliverables against increasingly exacting approval criteria. Any documents failing at a gateway were required to be reworked and re-submitted. Skeleton reviews were high level scoping exercises, generally undertaken prior to February 2023. The bronze and silver gateway reviews (February and April 2023) were used to assess the progress and quality of the deliverables at that point in time, to review any outstanding risks and issues and to confirm the actions that needed to be put in place to address these risks before the next gold gateway reviews between July and September 2023.

The key purpose of the gateways was to:

- Confirm the plan to produce the final business plan submission;
- Refine the deliverables – structure and chapters, supporting evidence and tables to make it a high quality, submission;
- Confirm the authors, contributors, reviewers, and approvers, as well as the time required from each resource to produce their deliverables (bronze). Identifying any individuals that may be a single-point-of-failure or that required external support;
- Confirm how other inputs would be sourced and the associated decision(s) required. The gold gateway reviews were used to confirm that the plans had been fully completed and fully assured. The checklist requirements to pass the gold gateway were that:
 - The relevant documentation was ready to be submitted;
 - The submission requirements had been checked and adequately addressed;
 - The data within the tables, models and documentation had been validated back to an assured source;
 - Any required second line peer review and management review and sign off had occurred; and,
 - The first, second, and third-line assurance and actions had been completed and addressed. At the gold gateway review meetings, evidence was provided to the accountable executive sponsor to confirm that all key deliverables including data related materials had been addressed.

Confirmation that each gold gateway had been passed and that the plans had been fully completed and fully assured was provided to the UUW board. This was also subject to third-line external assurance confirming that the plan had satisfied the Ofwat requirements, and the board assurance statement could be approved.

10.10 Independent review

To ensure that our submission is independently challenged, we utilised an independent challenge group, the ‘YourVoice’ panel. This is an independent stakeholder forum which monitors and challenges us on the delivery of our business plan, reviews and assures our reporting to customers and scrutinises our customer engagement on the development of our plan. YourVoice’s findings are reported to the board alongside the findings of our Corporate Audit team and external assurance providers to aid the board’s decision to approve the submission. YourVoice helps to ensure that we have used appropriate customer research in line with Ofwat’s requirements, effectively understood customer requirements and priorities and that these priorities have been adequately reflected in our business plan.

‘It is YourVoice’s view that United Utilities Water has carried out independent, comprehensive, representative, high quality customer research and engagement in a transparent way to support the formulation and submission of its 2025 to 2030 Business Plan. We believe that the evidence, information and views obtained from customers have genuinely driven and informed the development of the company’s 2025 to 2030 Business Plan to the benefit of current and future customers’.

Source: YourVoice report to the Board of United Utilities, September 2023

Arup was commissioned to undertake independent scrutiny and challenge on the UUW WINEP programme, which was informed by an independent panel (the ‘WINEP scrutiny and challenge independent panel’.) The scrutiny and

challenge was focused on assessing whether activity included in the WINEP was needed, costed appropriately and whether the programme was correctly optimised. The Arup Report, informed by the WINEP independent scrutiny and challenge panel concluded:

“Based on the evidence we have seen, we consider that UUW is drawing up an evidence-based and compliance-focused WINEP that is set to meet core regulatory requirements and expectations without extending the scope in a way that risks being seen to embellish the programme. UUW has applied an established and systematic approach to identify and confirm requirements and determine and prioritise actions in response. We consider that UUW has positively responded to the challenge and scrutiny applied by Arup and the panel members. We note a strong push across the leadership and the operational teams on trying to ensure that the programme over time achieves a balance of solutions across traditional engineered approaches and alternative solutions where these are feasible and appropriate.”

Source: WINEP Scrutiny & Challenge, Independent Review Report – Final, 13 January 2023

The role of assurance aggregator was used to provide confidence that each of the submission components of the programme have been developed appropriately and to a high-quality standard. The activity reviewed draft deliverables and processes against the specified requirements (regulatory and internally driven). There were two assessments performed over the duration of the PR24 programme as part of our assurance process. The first was aligned to the Bronze gateway and the second aligned to the Gold gateway. The assessments confirmed that assurance requirements were met by the programme and any identified risks/issues identified have been satisfactorily addressed. The aggregate assurance was part of the overall PR24 Assurance Plan and wider UUW assurance and governance processes. Deloitte concluded:

‘UUW has identified the requirements it needs to satisfy Ofwat’s Final Methodology and subsequent information notices, developed the required submission deliverables and followed a defined process to quality assure these deliverables. This process has included the application of the UUW assurance framework which encompasses internal and external assurance activities which, when combined, cover all requirements of the submission’

Source: Deloitte, Price Review 2024: Assurance Aggregation – Overall Summary Report: Final, 25 Sept 2023.

Table 1 below demonstrates the application of the assurance framework on the business plan submission.

Table 1 1: Assurance of the plan

Business Plan Submission		1st Line	2nd Line External SME/ Scrutiny	3rd Line External Assurance
Chapter 1	Executive summary	Chief Executive Strategy, Policy and Regulation Director	Corporate Audit	Deloitte LLP (aggregate)
Chapter 2	Water and more for the North West	Head of Long-Term Strategy Head of Environmental Strategy	Jacobs Lexington Corporate Audit	Deloitte LLP (aggregate)
Chapter 3	Customer, community and stakeholders	Regulation, Reform and Compliance Manager Customer Services Director	DJS Research Shed Research Corporate Audit	Turner Townsend (targeted) Deloitte LLP (aggregate)
Chapter 4	Driving affordability	Regulation, Reform and Compliance Manager Customer Services Director	Corporate Audit	Deloitte (targeted) Deloitte LLP (aggregate)
Chapter 5	Delivering great service	Head of Regulatory Strategy Water Treatment Director	Frontier Baringa	Deloitte LLP (targeted) Turner Townsend (targeted) Deloitte LLP (aggregate)

Business Plan Submission		1st Line	2nd Line External SME/ Scrutiny	3rd Line External Assurance
Chapter 6	Delivering Social and Environmental Value	Head of Long-Term Strategy Asset Management Director	Arup Aecom Jacobs	Turner Townsend (targeted) Deloitte LLP (aggregate)
Chapter 7	Resilience and asset health	Head of Asset Lifecycle and Systems Asset Management Director	Ovarro Jacobs	Deloitte LLP (targeted) Deloitte LLP (aggregate)
Chapter 8	Delivering at efficient cost	Group Financial Controller Chief Financial Officer	Baringa A&M Mott McDonald Corporate Audit	PwC (targeted) Deloitte LLP (targeted) Deloitte LLP (aggregate)
Chapter 9	Risk, return and responsible behaviour	Group Financial Controller Chief Financial Officer	Reckon LLP Frontier JP Morgan Deutsche Bank Corporate Audit	Deloitte LLP (targeted) Deloitte LLP (aggregate)
Chapter 10	Assurance and track record	Head of Regulatory Strategy Strategy, Policy, and Regulation Director	Corporate Audit Deloitte LLP (targeted)	Deloitte LLP (aggregate)
Long term strategy	Long-term strategy adaptive plans	Head of Long-Term Strategy Asset Management Director	Fast Track Squared ARUP	Deloitte LLP (targeted) Deloitte LLP (aggregate)
Data tables		Accountable Director Executive Team	Baringa KPMG (targeted)	PwC (targeted) Jacobs (targeted) Deloitte LLP (aggregate)

10.11 Transparency of our reporting

The provision of reliable, accurate and transparent information and data is an essential part of building and maintaining trust with customers and other stakeholders who rely on the services we provide. Given our position as a provider of essential public services, we have a responsibility to provide accurate and easily accessible information about performance. We pride ourselves on publishing trusted information and have a proven track record of providing open, transparent and high-quality information about our performance to customers, stakeholders, and regulators. A summary of this is set out below:

- During AMP6 and AMP7 we have published annual draft and final assurance plans where we actively seek feedback from stakeholders to help shape the plan;
- As well as publishing the minimum information requirements set out by Ofwat within the Annual Performance Report, we supplement this with a broad range of communications channels to communicate outcomes to customers including a customer focused crystal marked performance summary, a website and social media focused infographic and an animation summarising our performance for the year;
- We have developed a sound approach to assurance, which is a key enabler to high-quality data provision. We intend to maintain and, where appropriate, evolve our approach to assurance to build further on the trust we have earned, make improvements where shortcomings are identified and to enhance the confidence that customers, regulators, and other stakeholders can have in United Utilities Water's reporting;
- YourVoice provides the ideal opportunity to have detailed and transparent reviews of the risks, issues and opportunities facing the company with customer representatives and to have open and honest two-way

conversations with them to help to ensure that our plans reflect customers' views and that we continue to deliver the services that we promised;

- In addition to publishing minimum requirements, we are committed to providing regular and transparent reporting on our performance commitments and outcome delivery incentives and to updating customers and other stakeholders on delivery against our totex allowances and environmental performance;
- While we provide a detailed supporting commentary to our main Annual Performance Report, we recognise the requirement for clear concise information in order to enable our stakeholders to make best use of it;
- We constantly strive to improve our information and we are looking to adapt and improve the APR for the coming business plan period. We will continue to include relevant background information, reflecting the detailed review of our performance that some of our stakeholders may seek to undertake. We will also include a number of cases studies which we hope will help bring the report to life;
- At the start of AMP7 we produced a more detailed definition and explanation of our performance commitments and outcome delivery incentives. This information is published internally and available to all employees and has also been shared and used for more detailed discussions with key stakeholders such as YourVoice, and representatives from the Environment Agency and CCW. It is our intention to repeat this when our AMP8 submission is finalised; and,
- Further to our aspiration to show transparency, we have published our most recent Annual Performance Report (APR) data under an open data licence in a format that can be accessed and reused by all. Our open data will aim to follow best practice and will adhere to the FAIR principles (findable, accessible, interoperable, and reusable) in line with our developing open data strategy. Documents contain metadata and are published in a format that is accessible. Data tables are published in CSV format. We have taken the opportunity to publish historic data tables from 2020/21 and 2021/22 in CSV format.

10.12 UUW Board oversight

The UUW board and the Executive Committee have met on a regular basis and have had extensive discussions on the programme, covering all aspects. There has been regular engagement and updates with the board from the Our Future Plan programme and strategy boards.

The board began its initial discussion on the PR24 business plan in 2020, prior to the creation of the Our Future Plan function. These meetings helped to direct the ambition of the plan, linked to the company goals and vision. Additionally, the Board provided rigorous challenge on the plan, ensuring it was delivered in a manner that will meet both the requirements of the board and also those regulatory requirements set out in the Ofwat final methodology. The result of these challenges has been acted upon and built into the chapters of our plan. The full timeline and subject matter of board engagement can be found in supplementary UUW77. This document also highlights the breadth of skills and expertise of the full board which has benefitted and influenced the submission.

Our assurance partners Deloitte reported to the board in September 2023, and presented their findings. Deloitte concluded:

'Based on the agreed scope of work undertaken, Deloitte has not identified any significant reasons that would prevent the UUW Board approving the PR24 business plan and subsequent submission to Ofwat.'

Source: Deloitte, Price Review 2024: Assurance Aggregation – Overall Summary Report: Final, 25 Sept 2023.

Alongside this we presented third-line assurance reports which underpin our plan, and confirmed to the board that no material actions were outstanding. As part of our assurance framework, our Corporate Audit function also conducted assurance of the plan, and they too presented their scope memo and findings to the board. The table above highlights the activities undertaken to provide the board with trust and confidence enabling them to sign the board assurance statement. In supplementary document UUW76 - *Confidence and assurance* we provide additional details on the third-party assurance and other associated independent third-party review and scrutiny.