

Request for change to performance commitment definition

B01: Inspiring our customers to use water wisely

Summary

We have a new Education ODI (B01: Inspiring our customers to use water wisely) for AMP7. The purpose of the ODI is to encourage more customers to pledge to use water wisely, to use our waste water service appropriately and to encourage the benefits of drinking tap water for hydration and health.

Following the outbreak of the COVID-19 pandemic and the Government imposed restrictions, we have been unable to visit schools in person as part of our 'Wonderful Water Tour' – where we undertake assemblies, workshops and use our two interactive education vehicles to deliver key education messages.

During these challenging times we believe it is more important than ever to continue to seek to drive behaviour change and that schoolchildren should not miss out as a result of the pandemic. So, we have designed an alternative education package that can be completed online which we believe will contribute to the same outcome as in person delivery.

However, the current ODI definition (as set out in the Final Determination outcomes appendix) requires that the activity must be carried out face-to-face for 30 minutes. We are therefore seeking:

- a change to the definition to include online activities - in specific circumstances; and
- given school closures took place prior to the beginning of the financial year, that the change should be retrospectively applied from 1 April 2020.

Our request relates only to broadening the method of delivery to reflect circumstances that were unforeseen when it was designed - the intent behind the measure and the design of the ODI would remain unchanged.

The following sections provide:

- an overview of our virtual programme;
- explain why online education will contribute to the behaviour change outcomes that the commitment is targeting;
- the outcome of our engagement with customers;
- views from our Customer Challenge Group (the Water Forum);
- plans for future assurance; and
- our proposed amendment to the performance commitment definition.

Change to delivery: our new virtual education programme

At the beginning of April 2020, we developed and launched an online suite of educational materials for use in school and at home. Our Education Kidszone is regularly updated, focuses on the three themes of sewers and blockages, hydration and wellbeing and using water wisely, and has already been voted one of the top ten online learning resources (www.fenews.co.uk) for those home schooling. At the same time we made our second children's book, 'Arthur Jones and the Fatberg of Doom' available on our website.

Building on this, and our experience of working with 800,000 customers over the last five years, we have now created a fully interactive, 30 minute online education programme for use in schools and at home, which delivers the same key messages as our usual school visits and, crucially, means we can also collect customer behavioural 'pledges' in a very similar way. But given it's virtual, we have enhanced it with games, videos and activities inspired by our class workshops and a 2D version of the Virtual Reality video that we use on the Digi-Bus as part of our 'Wonderful Water Tour'.

Children are guided by a Virtual Severn Trent employee who will narrate as they go and provides the substitute to what would be one of our educators going into school. There is an option for personalisation; the child's name can be added in and the narrator will then use this to guide them step-by-step through the activities. Children cannot make a commitment to behavioural change until they have been through all the activities. It is important to note that in theory, users could skip to the end of the session and complete the behavioural commitment. We have designed the programme to be fun and engaging to avoid this, but as set out later, tracking of IP data will ensure we would only count commitments from those who have been on the site for a minimum of 30 minutes.

The programme can be accessed here: <https://www.severntrent.education/>

Link to outcome: driving behavioural change

Given that this is a relatively niche circumstance, it is difficult to pinpoint evidence about the effect of substituting a 30 minute face-to-face session with a 30 minute online session in these circumstances - and whether there is any reason to assume that a pledge made following an online session would be less effective at driving behavioural change than one made in person.

We have, however, explored examples of how online activities have been used to stimulate behaviour change elsewhere, which gives us confidence that online pledges will be effective:

- Online interventions are commonly used in school settings to promote other desired behaviour, for example, better health outcomes.
- Online interventions allow for persuasive design and several cues associated with driving behaviour change. In the case of our programme this includes novelty, memorable aesthetics, tailoring and praise.
- The wider context in which the programme is being undertaken presents a unique opportunity to drive behaviour change – the disruption caused by the pandemic means that schoolchildren and their families are creating new habits and by moving our programme online we retain the chance to shape them as they are being formed.

Data integrity: capturing pledges or behavioural change commitments

In terms of data capture, we will be asking for a first name, a school, a year in the school and will also be capturing IP address data. We have made the necessary GDPR checks and will provide a child friendly privacy statement that will be included on the website. The use of this data has three purposes:

- The name to customise the content;
- The IP address to measure the length of time spent on the website to ensure we're hitting the 30 minute education time;
- The school and the year to ensure we do not duplicate and double count commitments when we are able to visit that school in person later-on.

We will keep individual commitments collected from the website stored so that if we go on to deliver an education visit to that school and collect commitments, it will be straightforward for us to subtract any individual commitments taken already for that school from any we get in an assembly or classroom.

Views of our customers

As explained above, we believe our proposed changes offer an alternative means for future customers to continue to benefit from our education programme (in what are challenging and unforeseen circumstances), that the revised means of delivery will contribute to the outcome intended, and the ODI design agreed in the final determination will be unaffected. We have therefore followed Ofwat's requirement that the engagement should be 'proportionate to the proposed change' and focused our customer engagement on the proposed change in the means of delivery.

In order to test customer response to the proposed change, we conducted a poll on Tap Chat, our online community panel. We showed customers a comparison of school assembly and pledge vs digital learning and pledge (stimulus material is provided in appendix 1). The poll question was: **Is it acceptable that pledges made after a 30-minute education session EITHER face-to-face OR online should count towards our education target?**

We also invited Tap Chat members to view the new digital education materials in full on our website and to give their comments on these. 317 customers voted in the poll and free text comments from 106 customers were collected.

86% of customers polled supported our proposal to include online sessions. Of those that left positive comments, these included:

"I think this is great and online learning is most certainly acceptable education and as such should be included in the count towards Severn Trent's Education target. Hopefully it will now have the added value of educating some parents too"

"It seems to me to be entirely reasonable in current circumstances that pledges online should count as well as those made in school. Indeed, more online activity might be a permanent feature"

"The new target seems entirely reasonable, especially given the circumstances"

"Anything that teaches children how important water is useful. I agree that including contact on line should count!"

"The site looks good, interesting and plenty of interactivity for youngsters to participate in. I see no reason why under this current situation (Covid-19) that you should not count both online and in school participation"

14% of customers polled did not support our proposal. Some of the concerns expressed included:

"I'm not sure whether young children should be expected to pledge to spread the word. It should happen naturally"

"As a retired teacher and headteacher, I am very appreciative of any work you do to assist schools. However I am also very concerned at the potential for brainwashing by encouraging children to sign up to a cause so soon after a visit. If you have faith in the quality of your message that is enough"

"While it is good that ST has created an online education resource, it lacks the spontaneity and interaction of face-to-face sessions in school. Online education tools are a second best approach"

"I don't think any corporation should be "educating" children about use of their services in schools. Any private corporation has a right to promote their own profitability but public sector schools shouldn't allow any private corporate influence of the curriculum"

Some of the concerns expressed related to whether the same engagement could be achieved without face to face spontaneity, a point we recognise but have aimed to negate through a varied online approach. Others were more principled objectives in relation to the use of the term 'pledge' – a concern we have noted but was embedded in the original PC design to ensure a stronger link between the activity of engaging future customers and the behaviours they then adopt.

Overall the vast majority of those polled supported the change.

Comments from the Water Forum

The Water Forum is content with this change to the ODI. The purpose of the original measure has been protected but pragmatically delivered so that the education goals will be delivered to children. We are reassured that customers have been consulted on the change and are overwhelmingly supportive. Of course, we look forward to the time when the face to face programme can be resumed as envisaged. Finally, we expect normal assurance processes will provide data on how well the company has performed.

Future assurance

Our reporting procedures against the existing definition and accompanying process description template (PDT) have already undergone extensive third line assurance by Jacobs. This involves identifying potential reporting risks and setting out mitigations. No material weaknesses in reporting processes were found.

Should Ofwat approve the proposed change, we will repeat this assurance of our procedures and PDT to reflect the new definition. We usually undertake this process once the definition is locked in as Jacobs demand a clear line of sight between definition and process, and any ambiguity as to the final definition could affect this.

In addition to re-assurance of the PDT, performance against our commitment will continue to be part of our established half and full year assurance processes.

Changes to the definition

Based on the proposals set out above, the only amendment required would be to allow virtual education as well as face-to-face. However, we have already built and invested in a school's programme that focuses on face-to-face intervention and this will continue to be our preferred method of engagement for AMP7. We would therefore only use the virtual method in:

- exceptional circumstances (such as those in which we currently find ourselves); and
- where we can evidence that children are home-schooled or for use in schools where external visits are not possible.

The latter point gives us an opportunity to have a completely inclusive key stage two education offer for the AMP. We suggest that a qualification could be put into the definition to reflect these circumstances, and would be subject to our usual assurance processes.

We have included an annotated version of the current definition below with the suggested change. No other part of the definition would be impacted.

Unique Reference	PR19SVE_B01
Detailed definition of performance measure	<p>The number of customers who pledge to change their water use behaviour based on the company's education programme. This performance commitment will report the number of engaged customers who agree to make a behavioural change and follow at least one of the following three target behaviours:</p> <ul style="list-style-type: none"> -Using wonderful water wisely (not wasting water); -Knowing what not to put down the toilet and sink; and -Choosing tap water for a healthy you and a healthy environment (reducing plastics). <p>For a customer's behavioural change commitment to count towards this measure, the customer must have participated in a face-to-face engagement session of at least 30 minutes' duration provided by the company <u>OR- where face-to-face engagement is demonstrably not possible (for example, Government advice against in person engagement is in place, pupils are home-schooled, or external visitors are prohibited from attending the school), Severn Trent's 30-minute virtual engagement option must be completed.</u> The company will invite its customers to agree to behavioural change commitments following this engagement and it will record the number of customers that agree to do this.</p>

Appendix 1: Stimulus material used for TapChat

POLL INTRODUCTION AND QUESTION

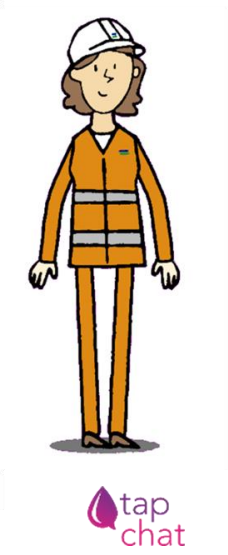
In normal circumstances, Severn Trent's education teams visit hundreds of primary schools across our region each year. They deliver education on water – why it's good to drink, why it's a precious resource we must all look after, and what happens to dirty water once it leaves their homes, including what can go wrong if they flush the wrong things down the toilet or the kitchen sink.

Our assemblies are interactive; we dress up volunteers, ask them to read things out loud, use props, visuals and music and get the children engaged by answering questions or playing games. At the end, the children are invited to make a commitment to good water and wastewater behaviour based on what they've learned. We record the number of children who make this pledge. These commitment numbers are how we measure our success against our education target. Currently the target states "for a customer's behavioural change commitment to count towards this measure, the customer must have participated in a face-to-face engagement session of at least 30 minutes' duration provided by the company."

During the Coronavirus crisis, we can no longer visit schools so we've introduced Molly and The Journey of Water, our first online-exclusive digital lesson. Our standard education services will resume as soon as possible.

Molly guides children on "The Journey of Water" experience in the same way our live assemblies would. We talk about all the areas mentioned above before providing the facility to make a behavioural change commitment at the end and collect their own commitment certificate. We have wordsearches, true or false and drag and drop games about being a water saver or a water waster. We've got animations, videos and even a song about poo to make the lesson as engaging as possible. There are enough activities for at least 30 minutes of education and enough interactive, inspirational material to leave the same lasting educational impact. You can try it for yourself by visiting <http://www.stwater.co.uk/kidszone> and clicking on the banner to join Molly! You can see a comparison of our assemblies and the online education on the next slide.

We are seeking a very slight change in the wording of our education target to allow for the use of our new virtual education in the new circumstances. We propose that pledges made both in school AND online should count towards our education target. Please vote in our poll to tell us whether or not you think this is acceptable – and feel free to add a comment.



COMPARISON OF SCHOOL LEARNING VS DIGITAL LESSON

School assembly and pledge



Online materials

QUESTION	ANSWER	DRAW
 When I have a bath, I fill the bath all the way to the top.	<input type="checkbox"/>	WASTED SAVED
 When I have a shower, I only stay in it for 4 minutes.	<input type="checkbox"/>	
 When I water the garden, I always use a hosepipe.	<input type="checkbox"/>	
 When I wash my hands, I put the plug in the plug hole.	<input type="checkbox"/>	
 When I brush my teeth, I always leave the tap running.	<input type="checkbox"/>	

Online pledge

