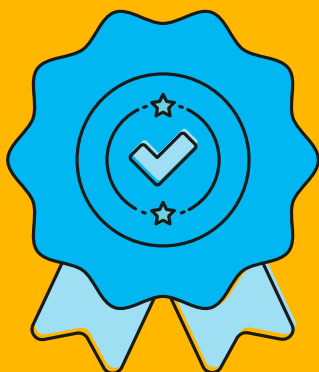


Trusting the information we publish

**Our data assurance summary
for 2019/2020**



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Navigating this document

Contents page

The contents page is linked to every section within this document. Clicking on a specific section will instantly take you to it.

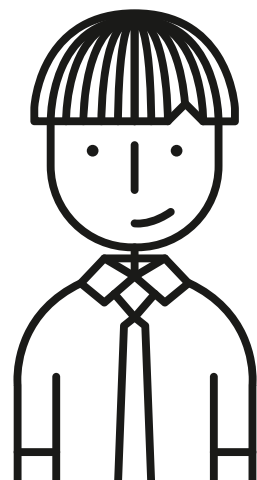
- 1 Click on the contents button to return to the contents page.
- 2 The back button returns you to the last page you visited.
- 3 This button takes you to the previous page.
- 4 This button takes you to the next page.
- 5 'Breadcrumb' navigation allows you to retrace your steps within a section.

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There are also many other clickable links within this document which we've made easy to spot by underlining and highlighting them in [blue](#). If you click on one of these links, but then wish to navigate back to the page you were viewing previously, simply click the '**Back**' button at the top of the page.

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4.	Completed assurance and key findings In this section we explain the areas that we have targeted, why we are targeting this area, what assurance we have done and the outcomes of that assurance.	18
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We have published our Glossary of Terms separately. You can view this here: yorkshirewater.com/reports

1. What is assurance?

Assurance at Yorkshire Water

The aim of our assurance is to make sure you can trust the information we publish.

You will hear a lot about assurance throughout this document and to set the scene, we will give you a brief overview of what we mean by assurance first.



What is assurance?

Assurance is a process we use to make sure you can trust the information we provide to you.

The assurance process is to review the ways we work and our information to make sure that our publications are accurate, accessible and easy to understand.



How does it work?

We have assurance teams to ask questions and challenge the information so that we can rely on it.

This assurance plan shows you how we check and review our information to make sure that what we publish is correct and meets everyone's needs.



Why does assurance matter?

It is important that you can be sure of the quality of the information we publish, so that you can be confident in us and how well we are doing in delivering the promises we made to you.

2. About this document

We want to provide our customers with information that they can trust. We publish documents throughout the year on this. These documents aim to give you confidence in the completeness and accuracy of our information. They set out our assurance process and plans and the main findings from those assurance activities.



Risks, strengths and weaknesses statement

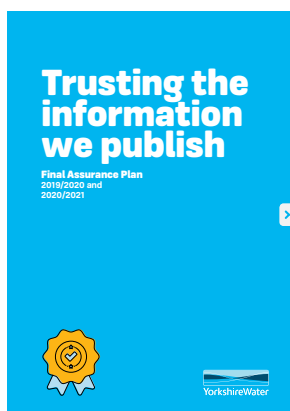
November 2019

A summary version of this document is available

We asked you to let us know what you think we did well, what you think we could improve on and what you were concerned about in regards to the information we publish.

You can read this document here.

yorkshirewater.com/media/2203/yorkshire-water-risks-strengths-and-weaknesses-statement-november-2019.pdf



Assurance Plan

March 2020

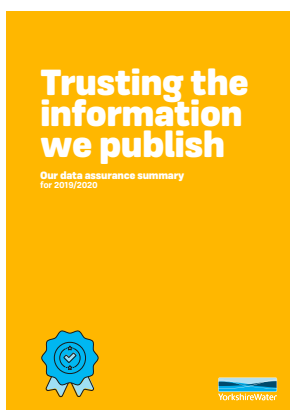
A summary version of this document is available.

We took the information from the risks, strengths and weaknesses and we used it to make sure that we target areas that are important to you or are a risk to you.

The assurance plan tells you what we are putting in place to address your concerns and give you more confidence in the information we publish.

You can read this document here:

yorkshirewater.com/media/2363/trusting-the-information-we-publish-final-assurance-plan-2019-2020.pdf



Data assurance summary (this document)

July 2020

This document tells you about the assurance that we have carried out this year and what we found as a result of our assurance plan.

We publish it in July, alongside our annual performance report, which provides you with information on the performance we achieved in 2019/2020.

This report provides information on the assurance completed throughout 2019/2020 and the assurance completed on our annual performance report.

3. Our assurance approach

Our assurance process

We want our customers to trust that the information we publish is accurate, accessible and easy to understand. It is important to us that we get it right for our customers. Our Board is accountable for the quality of our information and we want to make sure it meets your needs.

We apply assurance to our data and our publications. We have data assurance processes in place to ensure that the data contained within our publications is accurate. We have a wider assurance process in place to make sure that our publications meet any regulatory guidance, are accessible and easy to read and are relevant for you.

Our annual performance reporting process is certified to the Quality Management System standard ISO9001:2015. We apply the principles of this standard to the assurance processes for our other publications.

In this section, we explain:

- The assurance principles we apply when we assure our published information.
- Our assurance process and what we do when we publish our information.
- Our risk-based approach to assurance.
- The three levels of assurance we apply to our information and publications.
- Our understanding of our accountability and how we continually improve our process.

Our assurance principles

We want the information we provide to be important to you so you can rely on our documents to be relevant. Our objective is for you to be able to put trust in the information that we provide.

We want you to understand how we are performing in the areas that impact you the most. We want to demonstrate that we are listening to our customers and acting accordingly.

To make sure we deliver on this commitment we carry out assurance following these principles:

Clear methodology

- We use a 'three lines of assurance' methodology to make sure our assurance is consistent.
- We risk-assess the work behind our publications and target the areas that have the highest risk of going wrong.
- We take time to analyse and understand guidance, regulations and cross-industry themes.

Relevant and transparent

- We make sure that the information in our publications is relevant to what is important to our customers right now.
- We make our documents easy to understand and make it clear what information is important.
- We will explain where we have not met our performance targets and how we plan to rectify this.

Governance and accountability

- We review our governance regularly to ensure that it is compliant with regulations.
- The Board approves and monitors our governance processes and reviews our performance.
- We monitor and report on any issues we find.
- We make sure that people understand what processes they are accountable for.

Ethically responsible

- We have a culture of 'acting with integrity'. This is an environment where all employees do the right thing. This is our 'tone from the top' as our Board adopt this principle.
- Our values allow for growth in skill and knowledge, where close working relationships can grow. We trust our employees and our employees understand it is important that our customers trust us.
- We understand that it is crucial to have the right culture to gain the trust of our customers.

Engagement

- We value the opinion of our customers and engage with the Yorkshire Forum for Water Customers (the Forum). [You can read about them here.](#)
- We ask our customers to review the information that we provide and independently challenge us. We publish the feedback and our responses annually. This is our risks, strengths and weaknesses statement.
- We listen to feedback from our regulator, Ofwat and take time to understand the requirements of the industry through our horizon scanning activities.

The assurance process

We follow a methodical process to make sure that our data and publications are assured adequately. This is a summary of our process.



Planning

We review the guidance to understand what is required of our publications for our customers, regulators and other interested parties. We put a plan in place to make sure we can deliver what is required.



Risk assessing

We review the likelihood of the information being incorrect and what impact this could have on our customers, on meeting our regulatory requirements and on how we conduct our business activities at Yorkshire Water.



Developing and completing our assurance

Using our risk assessment, we make sure that the right level of checks take place, at the right time by the right people. We use our three levels of assurance methodology and implement it, considering the level of risk that has been identified. We also externally assure our publications where required.



Approval and publication

We present the outcomes of our assurance to our Board Audit Committee who then report to our Board. The Board is accountable for the quality of the information that we publish in our reports. It owns and approves the information within our reports. If the Board is satisfied that processes have been followed and any findings from assurance have been appropriately actioned, it will give approval for publication.



Review

We look back over the assurance process and make improvements. We gather feedback from customers and other interested parties and we also review what could have gone better. This helps us put together our risks, strengths and weaknesses statement.

Planning

The requirements we will fulfil

It is a requirement of our licence to report information to our customers and Ofwat (and other regulators/external bodies as required), and to confirm compliance with obligations.

We want our reports and published information to be accurate, transparent, easy to read and compliant with the requirements.

Our wider assurance processes are the considerations we make when publishing our data for you. We do this to make sure that the publications will adhere to our regulatory requirements and contain information you want and trust. We use this process when planning and reviewing our publication information.

Our Regulatory Compliance and Assurance Team are responsible for making sure that the wider assurance process is followed, that we abide by our assurance principles and that our publications meet the requirements and are published within the right timescales.

We carry out the following processes to ensure that we plan our publications and the assurance on our publications adequately.

Horizon scanning

Throughout the year our Regulatory Strategy Team identify the topics that are important in the water industry and across the UK. We care about the future economic, social and environmental issues that Yorkshire faces as a region. We are proactive when we see something coming up that may affect our customers, or the ways we will be required to work. It helps us to understand the information that you might want to see in our publications.

Regulatory guidance

Our Regulatory Compliance and Assurance Team analyse and interpret the regulations and guidance that are set by our regulator Ofwat. They support teams to make sure what they do complies with these. Our Data Providers, Data Managers and assurance teams review our documents and processes to make sure that we meet our obligations. They make sure our customers understand these requirements too. This means our customers can read our publications objectively and with better understanding.

Stakeholder engagement

We believe our customers and stakeholders should be involved in improving how we provide information in our publications. We consult with our customers and stakeholders regularly and often. This helps us to understand what gives you confidence in our publications. We describe how we do this in our risks, strengths and weaknesses statement.

These activities are considered when we plan and review our publications.

Risk assessing

Understanding where things may go wrong

Not all data is the same. We recognise that we need to give you greater trust in the areas that have a bigger risk or are important to you. We call this our risk-based approach.

Our assurance approach uses a method called 'three levels of assurance'. We make sure we apply these levels of assurance proportionately to the level of risk of error associated with the information we publish, or with the publication itself. Before we apply the three levels of assurance to our documents and information, we assess the risk associated with the data we are providing you.

To develop our plan, we risk assess the information that goes into the reports and decide how much assurance to apply.

When we assess risk, we look at the likelihood that something will go wrong and how big the effect will be if it does. For our reports, the risk is the possibility that our documents will contain incorrect information. If that happens it will have a negative effect on the quality of the information in our reports and our customers may not trust us.

Managing risk is important to us. Our information is checked to make sure it is accurate and meets your needs. This will happen whether the information is considered higher risk or not. The higher risk information will just have more assurance overall.

Each year we publish our risks, strengths and weaknesses statement which lets you know what risks we have highlighted. You can read the statement [here](#).

yorkshirewater.com/reports

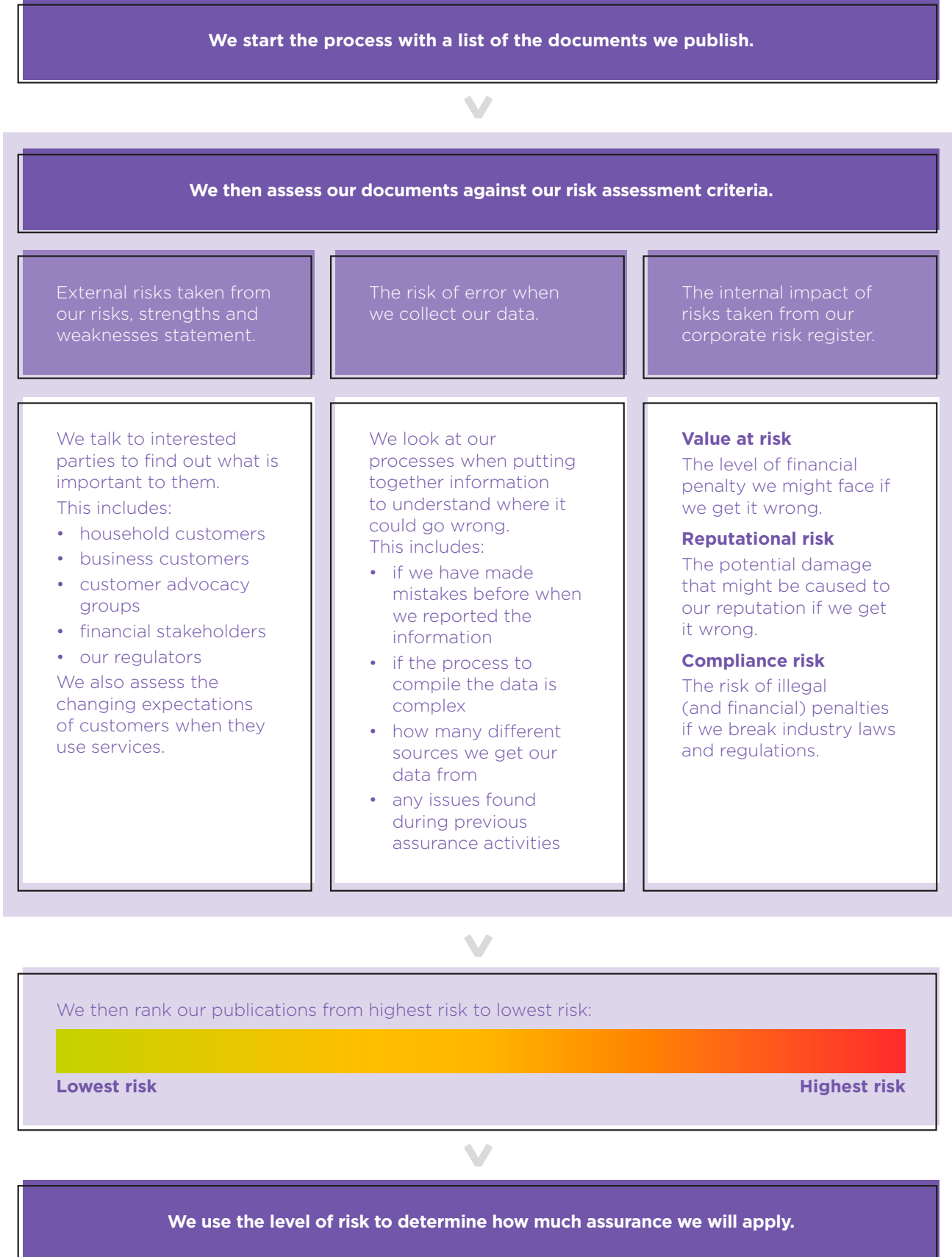


The areas where we apply more assurance

- Where our assurance processes have identified areas for improvements.
- Where we forecast that we will not meet our commitments or where we did not meet them in the previous year.
- Areas where we gather lots of data, sometimes from several sources, to put together the information we publish.
- Where there is change inside or outside the organisation.
- Where there are financial rewards or penalties involved. (Ofwat call this outperformance and underperformance).
- Where there have been changes or additions to what we are required to report.

Our risk assessment approach

We carry out a risk assessment on the documents we publish to determine what amount of assurance we will apply to it. Our approach is illustrated below:



Developing and completing our assurance

Our three levels of assurance

We use a 'three levels of assurance' way of working so that you can trust our documents. We call this our methodology. We apply this across all work. This methodology gives us consistency across our reports as some of our data comes from several sources.

By putting our assurance activities into three levels, we make sure that we apply the right amount of assurance, at the right time. A description of the levels of assurance is provided in the diagram below:



Oversight of the three levels of assurance

The Regulatory Assurance Manager ensures that the overall publication and the information contained within it is fully and appropriately assured. Some lower risk information will be assured to level 1 and level 2 only. Any areas identified as targeted areas for assurance, or considered higher risk based on the previous risk assessment, has level 3 assurance applied.

The assurance plan is approved by the Regulatory Compliance Manager and by the Board Audit Committee. The Regulatory Assurance Manager puts in place processes for level 1 and level 2 assurance reviews and approvals. The Regulatory Assurance Manager will appoint the external auditors for level 3.

Based on the risk assessment, the Regulatory Assurance Manager will work with the auditors to ensure all relevant information is audited. This will be put into a plan. Progress against the plan will be reviewed regularly and reported to the Annual Performance Report Steering Group and other appropriate internal governing bodies, who oversee the audits are being carried out effectively.

Any actions arising from audits will be completed. The results of our performance are presented to the Yorkshire Forum for Water Customers (the Forum). Our technical assurance providers, Jacobs, attend the Forum to present its views on our performance. The Forum has the opportunity to challenge us on our performance and how we are delivering against our commitments.

Approval and publication

Accountability of our data

The findings from the assurance that has taken place is presented to the Board Audit Committee. Our external auditors report their findings directly to the Board Audit Committee. This makes sure that the assurance carried out is independent and our Board Audit Committee get an accurate view of what the findings are. It reviews any action that is being taken in relation to findings to make sure that the data we provide is accurate.

The Board Audit Committee scrutinise the information presented and ask our senior managers and those responsible for providing the data any questions it may have. This ensures that the Board Audit Committee has a full understanding of whether the processes in place have been followed, why any findings have arisen from the audits and assurance reviews and the action being taken to address these findings. It then reports this information to the Board.

The Board is accountable for the quality of the information that we publish in our reports. It owns and approves the information within our reports. To make sure that it is satisfied with the information, the Board seeks confirmation from the Board Assurance Committee that the planned assurance processes have been followed and that appropriate action has been taken on any findings identified. If the Board is satisfied, it will give approval for publication and will sign a Board Assurance Statement. If a publication does not need full Board approval, this process will still take place with the appropriate Director reviewing and approving the publication on behalf of the Board.

Our reports are then published on our website and made accessible to our customers and other interested parties.

Review

Continuous improvement review

When our information has been published, we review the processes that we have followed. We identify where we could make improvements to the process and put together a plan to implement these improvements across the business.

We review our assurance findings and improve the processes to put together and validate the data we put in our publications.

We engage with our customers and other interested parties to make sure that they understand our publications and they believe that the publications are relevant and transparent.

We review all the findings from our review and put in place improvement plans to continuously improve the way in which we provide information. This information feeds into our risks, strengths and weaknesses statement and then our assurance plan. Progress on the improvements we make is reported through the annual performance report and the data assurance summary.

We also update the plan for our next publications, completing our continuous improvement cycle.

4. Completed assurance and key findings

Targeted Assurance

We applied targeted assurance to areas that we identified as being important to you or being higher risk. We applied more assurance to these targeted areas so you can trust that our information is correct.

We identify these areas as part of our risks, strengths and weaknesses exercise. As part of this we consult with our customers to understand what is important to them. These targeted areas contribute to the completion of our annual performance report and make the information we provide to you accurate.

These are our targeted areas:

Performance commitments where we missed our target in the previous year

We put extra assurance around calculating and reporting our performance against our targets. This is because some of our performance commitments are associated with financial rewards or penalties. Where we are forecasting a financial penalty, we want to make sure that we are transparent with our customers about our plans.

Performance commitments where we have received queries from Ofwat

When Ofwat review our annual performance report they can send us queries and ask us to clarify information surrounding the data we have provided. We want to continually reduce the number of queries that we receive to show that we are providing all relevant information and being transparent with our data.

Effect of our internal SAP programme on our reported information

We have updated SAP, which is one of our internal reporting systems. The processes to implement some elements of these improvements are still ongoing. We completed extra assurance to certify the accuracy of the data we are providing through this system.

New connection charging arrangements publication

Ofwat and other interested parties told us to improve in this area. We were assessed on this document as part of the Company Monitoring Framework in January 2019. Ofwat advised us of concerns they had with the new connection charging arrangements publication.

Regulatory information section of our Annual Performance Report

Through internal assessment and upon receiving queries from Ofwat we identified errors within our reporting. The regulatory information section of our annual performance report provides information summarising around 6000 pieces of data across several data tables and we have a regulatory requirement to provide this. We have applied added assurance to ensure that this is comprehensive and accurate.

Improving accessibility and awareness

When we completed our risks, strengths and weaknesses statement our customers highlighted to us areas in which we could improve the accessibility and awareness of our publications. We applied extra assurance to make sure that our customers had access to our information and it is presented in a transparent way which is easy to understand.

Charging arrangements for new connections

As part of our ongoing assurance over our publications, we identified that our quotation calculation tool contained errors. These errors could lead to inaccurate quotes being given. We put together a plan to review and provide enhanced assurance to make sure this would be accurate going forward.

This table provides a summary of why the targeted area has been included.

Targeted area	Comments	Target missed or forecast to be missed in 2019/2020 (at November 2019)	There have been internal or external changes that affect how we report	High priority area	Errors have been identified with improvements required
Performance commitment: Drinking water quality.	This continues to be a targeted area. This has been a targeted area over the last 4 years due to our failure to meet our target.	✓			
Performance commitment: Drinking water quality contacts	This continues to be a targeted area. This has been a targeted area over the last 4 years due to our failure to meet our target.	✓			
Performance commitment: Category 1 and 2 pollution incidents	We have missed our AMP6 target for this performance commitment.	✓			
Performance commitment: Measure of Customer Service (SIM)	We have missed our AMP6 target for this performance commitment.	✓			
Performance commitments where we have received queries from Ofwat	We received queries from Ofwat to clarify information within our APR or errors have been highlighted.				✓
Effect of our internal SAP programme on our reported information	We are continuing to target this area as we are still upgrading our SAP system. The accuracy and completeness of the information from our IT systems is central to the overall accuracy of the information we report.		✓		

Targeted area	Comments	Target missed or forecast to be missed in 2019/2020 (at November 2019)	There have been internal or external changes that affect how we report	High priority area	Errors have been identified with improvements required
New connection charging arrangements publication	This is a targeted area as concerns were raised about the information within this publication.				✓
Regulatory information section of our Annual Performance Report	We identified internally that there were errors in this information. Ofwat also highlighted this in their query process.				✓
Improving accessibility and awareness	We are targeting this area as we want to continue to strengthen the trust our customers have by improving our transparency.			✓	
Charging arrangements for new connections	Our internal assurance checks identified errors in the processes for our charging arrangements.				✓

Targeted area 1. Performance commitments where we missed our target in the previous year

It is important that our customers trust the information we provide for all our performance commitments. This means that we report transparently where we are not hitting these targets and explain our performance to our customers.

We understand that if we do not do this, we risk losing the trust of our customers.

As we are now at the end of our five-year business plan (AMP6), this is the last time we will report on the performance commitments as they have been defined in this plan. This year we will report if we have achieved our AMP6 performance commitments or not.

The performance commitments that we have not achieved in our final year of AMP6 are:

- Drinking water quality
- Drinking water quality contacts
- Serious pollution incidents
- Measure of customer service (SIM)

The following performance commitments were targeted areas throughout this year, however we have made improvements and have achieved our performance commitment target.

- Energy generation
- Leakage

What we said we would do and the assurance we said we would carry out

We said we would regularly monitor and review our performance against our performance commitments. This is to make sure that the information we report is accurate and transparent.

We review our performance commitments at our Board Investment Committee (BIC). BIC review the impact of missing our targets and set action plans to make improvements based on the data that is presented.

We will publish a performance summary report alongside our APR and publish information in formats suitable for our customers and other interested parties.

An update on our progress and key findings

Our data providers have monitored and reported on our performance against our commitments throughout the year. They have highlighted where we are off track, putting in place rectification plans and have reforecast our outcomes to show how we expect to perform.

Our Delivery Assurance Groups (DAGs) have reviewed and challenged our monthly reports. They have analysed the information and set new and revised targets to improve our performance.

Our DAGs have reported to our Board Investment Committee (BIC) this year. Our BIC also review our outcome delivery incentives, which are the penalties and rewards associated with the performance commitments. It reviews these for our internal business planning and year-end reporting to be able to provide accurate forecasting. The BIC scrutinise our performance and, if required, approve funding for improvements and monitor performance closely.

We make sure that the information about our performance commitments is accessible and transparent. We want to make sure it is clear to our customers how we are performing and the reasons behind this.

What we said we would do and the assurance we said we would carry out

We will check the processes that we use to collect data from our corporate systems for our performance commitments.

Our assurance process will continue to work with the Yorkshire Forum for Water Customers (the Forum) which challenges our performance, when our targets are missed.

Jacobs, our technical auditor, will perform a detailed review of these performance commitments for the 2019/2020 APR.

An update on our progress and key findings

Our new Integrated Assurance Framework includes an assurance map, which is presented to our Board Audit Committee (BAC). The assurance map allows our data providers and managers to score the amount of assurance in their area of the business against the most recent findings and risk of something going wrong. This gives us a confidence level for each area. More support is given to areas that are higher risk and which may affect the accuracy of the data that is reported. Our internal assurance teams work together to complete compliance reviews and audits to check that processes are compliant and produce accurate information. The BAC challenge and monitor the confidence levels to ensure we make improvements.

We work with the Forum and give them information about our performance commitments. Throughout the year, we present information to the Forum which enables them to challenge the ways we are working. We presented information to them about our final position against our performance commitments and our APR in June 2020.

The minutes of our meetings with the Forum can be found here. yorkshirewater.com/yorkshire-forum-for-water-customers

Jacobs have carried out an audit of our reported performance against our performance commitments. They have assured our reporting and checked that we have adhered to our regulatory requirements. You can read the findings from the assurance within Appendix 2 of our APR.

Next steps and action plan

We conduct a review after each cycle of assurance to make sure that we have considered all actions and lessons learnt. We will report our performance against our new performance commitments quarterly in 2020/2021. You can read about how we are preparing for our new commitments in Section 4 of our APR.

We have committed to analysing the data and the processes behind our data to make sure our reporting is accurate. This will provide transparency to our customers on our performance throughout the year. We look to publish our first quarterly performance report in September 2020.

Targeted area 2. Performance commitments where we have received queries from Ofwat

We received queries from Ofwat on some of our performance commitments. Some of these were errors and some were where we could have provided more information to explain our performance commitment sub-measures in our Annual Performance Report (APR).

We want to reduce our queries and make sure that the information that we report is clear and without errors.

What we said we would do and the assurance we said we would carry out

An update on our progress and key findings

We are implementing our integrated assurance framework to strengthen the assurance around our data.

We analysed the queries that we received and fed them into our integrated assurance group so the assurance providers from these business areas have targeted the processes behind this data.

We will make sure that the commentary around our data is clear and that we provide more information about the calculation of our sub-measures and we will undertake regular peer reviews to make sure that there is consistency in the data we provide.

We have hired a Regulatory Reporting Manager and a Regulatory Assurance Manager. These roles coordinate the collection and assurance of the data within the APR. Our data providers have submitted procedure documents and assurance statements for review. Our Regulatory Reporting Manager has reviewed the processes to make sure that data providers collected their data in line with requirements and reviewed what that data is telling us. Our Regulatory Assurance Manager reviewed the assurance statements to give us confidence in the data provided. They ensured that the commentary was clear, aligned to previous years reporting and any exceptions were explained fully to be able to give clear commentary to Ofwat and our customers.

We will develop our assurance principles across the business.

We have utilised the Integrated Assurance Group to develop our assurance principles across the business and strengthen the skills and knowledge of our level 1 and level 2 assurance providers. Through workshops and knowledge sharing we are making sure our assurance is robust.

We will review the queries that we have received to make sure that we continue to improve our data and commentary.

We conducted a review at the end of our APR process and have focused on the areas where errors have been highlighted. We conducted root cause analysis workshops and improved the processes and assurance around areas with queries or errors. We will monitor these areas throughout the year and request live commentary throughout 2020/2021 as part of our quarterly reporting process.

Next steps and action plan

We will continue to review areas where we have received queries from Ofwat to improve the way in which we collate and validate the data we publish. We will ensure that our commentary explains our data clearly and continue to improve, taking into consideration any feedback we receive. We will update you on our progress in our 2020/2021 Assurance Plan.

Targeted area 3. Effect of our internal SAP programme on our reported information

In 2018/2019 we upgraded our SAP IT system. SAP is enterprise software which is used to manage business operations and customer relations. We are targeting this area because the accuracy and completeness of the information from our IT systems is central to the overall accuracy of the information we report.

Our assurance will focus more on making sure the information we report on is accurate during the first year of reporting from our new SAP system.

What we said we would do and the assurance we said we would carry out

We will continue to assure the operation of our SAP system with User Acceptance Testing, training and dual reporting.

We will monitor any issues raised by our data providers.

Next steps and action plan

We will continue to monitor the effects of the SAP system on our reporting. We will work with SAP users and data managers to identify issues and understand the risks to reporting. We will continue to put in place processes to support our data providers in providing accurate data that our customers can have confidence in.

An update on our progress and key findings

The progress of the upgrade is reviewed weekly at a programme steering group. Our Internal Audit team and audit partners PwC assure the programme. A list of actions is reviewed weekly at a Steering Group meeting. These actions are monitored to make sure they are complete. The SAP programme is ongoing and is being delivered and tested in phases.

Whilst collating data for the APR and other internal reports, our data providers make us aware of any issues. Where it has been identified that SAP has caused issues or delays, our Regulatory Assurance Manager completes a risk assessment on the area to help implement plans for continuous improvements in the SAP system. These improvements bring down the risk of errors in our reports.

We will continue to engage with our SAP Quality Management team to monitor improvements and check with our data providers to reassess the risks to our reporting.

Targeted area 4. New connection charging arrangements publication

We were assessed as part of the Ofwat Company Monitoring Framework in January 2019 and serious concerns were raised with our New Connections Charges Arrangements publication.

It is important to us that the information that we publish is accurate and transparent and we have now made improvements to this publication using our targeted assurance process.

What we said we would do and the assurance we said we would carry out

We said we would apply additional checks before sending the charges to publishers.

An update on our progress and key findings

We had to make some corrections to the developer charges we had published for building water, mains connections and section 106 charges. Our Regulatory Change Manager has supported the data providers to review the processes to produce and calculate the charging information in this publication.

Draft documents had more assurance applied to them, with peer reviews and workshops taking place to ensure accuracy.

A secondary review of the charges publication was completed by the D-Mex Readiness Project Manager who was independent of the team involved in the process to produce the publication.

The publication was signed off by the Regulatory Strategy Manager and Manager of Developer Services before publication.

Next steps and action plan

The targeted assurance was completed by January 2020 and the charging arrangements were published on our website. There have been no errors found in our 2020/2021 charges since its publication. We will continue to monitor the process to produce future charges publications.

Targeted area 5. Regulatory information section of our Annual Performance Report

Through our own internal assessment and Ofwat's query process we identified some errors in our reporting. The regulatory information section of our Annual Performance Report (APR) provides information summarising about 6,000 pieces of data presented in various tables and is required as part of our regulatory

reporting guidance. We have applied more assurance to make sure that the information is accurate and transparent.

What we said we would do and the assurance we said we would carry out

We are recruiting a Regulatory Assurance Manager into the Regulatory Compliance and Assurance team.

We will review the assurance that has taken place in our APR 2018/2019.

Next steps and action plan

We will continue to review the processes in place to gather the information for the APR to continue to improve our processes and the checks in place. We will update you on the outcome of our improvements in our APR 2020/2021.

An update on our progress and key findings

We have hired a Regulatory Assurance Manager and a Regulatory Reporting Manager. The Regulatory Assurance Manager reviews the assurance taking place over the APR and manages other regulatory reporting publications. They have responsibility for reviewing the data contained within the APR. They complete an updated risk assessment of the data to ensure appropriate assurance has been put in place to support the information published. The Regulatory Reporting Manager coordinates the collation of the information that goes into the APR. They ensure the written information that supports the data is aligned and transparent and explains the data we have reported.

We have reviewed the assurance that was in place for the APR 2018/2019 and the procedures that accompanied them. We are now implementing new procedures to put together the information in our 2019/2020 APR with our Regulatory Assurance Manager and Regulatory Reporting Manager. Through this work they will improve the processes and checks in place ready for our APR 2020/2021. We have reviewed our processes for external assurance and are implementing a new Regulatory External Assurance Framework to strengthen and consolidate the external assurance taking place over our publications. This includes using a wider range of external auditors, giving us access to a larger resource pool and expertise in different areas.

Targeted area 6. Improving accessibility and awareness

Through our risks, strengths and weaknesses exercise, we identified a weakness around the accessibility and awareness of our publications. We are targeting this area because we want to continue to be transparent and remove any weaknesses in our reporting.

Our customers also told us that our performance webpage had lots of information, but the amount of text could be reduced. They told us we needed to find the right balance of text to visual images on our performance and reports webpage.

What we said we would do and the assurance we said we would carry out

We will conduct analysis with our customers and other interested parties.

We will explore different options for accessibility and we will continue to monitor our website analytics.

An update on our progress and key findings

We have used our online research community made up of 1,000 Yorkshire Water customers from across our region to ask for feedback on the information we report.

We sent publications to an independent research company, for their feedback on how they look and the information in them. With the feedback we received, we updated the look and content of our publications to make them easier to read. We reengaged with our online research company to make sure that they approved of the changes we had made.

We test our website with our customers to make sure that it is easy to navigate and to find our published documents. The link to our reports is located on the front page of our website so it is clear to our customers where they can read about our performance. We have also improved our reports webpage, using larger tiles and a clearer design to help our customers find information that is important to them. This includes larger icons, clearer text and a logical layout. We also made sure that all reports could be found here.

We redesigned the section of our reports page which explains our performance by monitoring how our customers access our information. We continue to make improvements to our website using this information, looking at which areas of our website our customers access the most. Where our customers may not be able to locate our publications, we have made improvements to our reports page to help direct our customers to the information they want.

We have worked with our design agency to make sure that our reports are easy to navigate. The 'contents' and 'back' buttons mean you can return to previous pages and navigate our publications more easily.

What we said we would do and the assurance we said we would carry out

An update on our progress and key findings

We will explore requirements for external accreditations for website design.

We have worked with the Plain English Campaign who helped us make sure our publications are easy to read.

We also held plain English training sessions with our data providers and Regulatory Compliance Team. They are responsible for providing the information within our APR. This training helps them to write clearly and in a way our customers can understand.

We continue to work with the Plain English Campaign to gain their Crystal Mark on our documents. By giving our documents the Crystal Mark, they are confirming the document has been written in a way that is easy to understand.

We will continue to work with the Yorkshire Forum for Water Customers to make sure that the style, format and content of our reporting is tailored to the feedback we receive.

We consulted with the Forum and presented the feedback that our customers have given. They hold us accountable for acting in our customers' best interest and making improvements based on the feedback received.

We understand that our APR is a long document. Feedback suggested that a shorter document would be more engaging, although it would contain less information. Over the last year we have created summaries of some of our publications to enable us to get feedback and understand if our customers feel they are adequate.

Our customers told us that videos are more engaging and help them understand what is important to them. Last year we created an animated video explaining our performance and what this meant to our customers. We received positive feedback and we have created a similar up-to-date video for APR 2019/2020.

We send the Forum feedback from our customer consultations so they can act in the best interest of our customers and consider their needs.

We will use internal audit to review our publications through detailed proofreading exercises to make sure our reporting is accurate and can be understood. The findings will be applied in our reporting.

We have used our Internal Audit function to review our highest risk areas. Our Risk and Compliance Statement has been coordinated and reviewed by our Internal Audit function. They audit our risk management process which ensures the process is robust and we confidently give information about our risk management process. They audited some of our tables to ensure that the information within these financial tables was accurate at the end of this AMP.

We will publish our APR data tables in excel format to make our data more accessible.

Last year we published our data tables in excel format as part of our Open Data project. This makes sure we are transparent with our customers and they can scrutinise the information we are providing.

We have published our data tables in excel format alongside our APR 2019/2020.

Next steps and action plan

We will continue to work with the Forum and our customers to make sure that the information we publish is accessible and easy to understand. You can read more about our work with the Forum and our customers in Section 6 of our APR and here: yorkshirewater.com/yorkshire-forum-for-water-customers/

Targeted area 7. Charging arrangements for new connections

Whilst completing assurance checks in November 2019, we identified errors in our 2019/2020 quoting tool which is used to provide quotations to our new connections customers by our Developer Services Team.

These errors led to some inaccurate quotes being issued. It is important that our charges are correct and our customers can trust us so we targeted assurance on this area to rectify these errors.

What we said we would do and the assurance we said we would carry out

We said we would rectify any historic errors that this may have caused.

We applied extra assurance to the rectified quotation model.

An update on our progress and key findings

We have contacted all impacted customers and have approached Ofwat with our findings and proposed remedies for the incorrect charging of our customers.

Customers who have been overcharged will receive a refund.

We conducted extra checks and put extra sign-off steps into the procedures we have in place to update the model. We worked with our data teams to make sure our processes did not create errors.

If a request is made to update the model, this goes through extra approval stages and change control processes.

Before a new version of our quoting tool is released it is reviewed and signed off by senior managers in our Developer Services and Customer Experience teams.

Next steps and action plan

The issue has been resolved and all refunds related to inaccurate quotes issued in 2019/2020 have been paid to affected customers. We have updated our procedures for 2020/2021 and all additional assurance measures have been implemented.




5. Our publication assurance


Publication Assurance





We have data assurance processes in place to ensure that the data contained within our publications is accurate. We have a wider assurance process in place to make sure that our publications meet any regulatory guidance and are accessible and easy to read. There are 24 publications that we have included as part of our assurance plan. We have applied our assurance process to them.





The table below provides a summary of the publications that had external level 3 assurance and the main findings from the level 3 assurance reviews. [Appendix A](#) provides further information on our completed assurance activities for all our 2019/2020 publications.




Our publications have been assigned a confidence grading related to the outcome of our assurance. The key to the gradings is explained below.

-  Meets the requirements and no material exceptions. Some improvement opportunities may have been suggested.
-  Potential concerns over reported information.
-  Material concerns over the validity of the reported information.

Publication	Main findings and outcomes
 PR19 Draft Determination Representation (August 2019)	<p>As part of the price review process, Ofwat publish a draft representation and water companies have the opportunity to review and respond to the draft. The Board has continued to follow the assurance processes in place for the PR19 programme. Assurance completed as part of the draft determination representation has built on the previous assurance obtained as part of the September 2018 Business Plan. Our response resulted in some changes in our data tables and there were some new data requests as part of this submission, which were assured by Jacobs. Additional experts were consulted to support us in our thinking and our response. Jacobs found some disparities in the information presented to them, which Yorkshire Water rectified. There were no outstanding actions at the time of submission. Jacobs concluded that the information provided on developer services provides a fair, balanced and understandable summary of their previous activities and costs and of their future expectation.</p>

Publication	Main findings and outcomes
 <p>Indicative Wholesale Charges Scheme (October 2019)</p>	<p>Each year we publish our Indicative Wholesale Charges Scheme. This publication contains primary and non-primary charges for retailers who operate in our region.</p> <p>Following the identification of a discrepancy between forecasting for 2019/2020 and revenue projections within one of the supporting spreadsheets during 2019, additional level 1, level 2 and level 3 assurance checks were put in place.</p> <p>Independent assurance was provided by our external auditors, Jacobs and Deloitte. Deloitte completed a review of the tariff model to confirm that the functionality is correct. Jacobs reviewed the guidance and compared our approach to ensure that charges had been calculated from the tariff model correctly and regulatory requirements had been met.</p>
 <p>Wholesale Charges Scheme (January 2020)</p>	<p>Following our Indicative Wholesale Charges Scheme, we published our Wholesale Charges Scheme. This publication contains primary and non-primary charges for retailers who operate in our region. Independent assurance was provided by our external auditors, Jacobs and Deloitte. Deloitte completed a review of the tariff model to confirm that the functionality is correct. Jacobs reviewed the guidance and compared our approach to ensure that charges had been calculated from the tariff model correctly and regulatory requirements had been met.</p> <p>In addition, our Internal Audit department also carried out a billing audit. This audit confirmed that the tariffs have been included in our billing system correctly.</p>
 <p>Bulk Supply Charges (January 2020)</p>	<p>Our publication sets out our charging arrangements for the provision of bulk supply of services to New Appointment and Variation (NAV) organisations that operate within the Yorkshire Water region.</p> <p>Independent assurance was provided by Jacobs who confirmed that our Bulk Supply Pricing (BSP) model for NAVs was consistent with our user guide. In addition, they confirmed that our charges publication was accurate and had been developed in line with the 'Bulk Charges for NAVs: Final Guidance' issued by Ofwat in May 2018.</p> <p>There continue to be opportunities to improve and Jacobs asked us to update our sign-off process for our source data to lower the risk of errors. We reviewed this and are putting in place a process to mitigate this risk.</p> <p>We published our charging arrangements on our website in January 2020.</p>
 <p>Charging Arrangements for New Connections Services (February 2020)</p>	<p>Each year, we publish our Charging Arrangements for New Connection Services based on Ofwat rules. These are charges for new connections made into our existing networks, including connections for new housing developments. Independent assurance was provided by our external assurance provider, Jacobs.</p> <p>Jacobs confirmed that we had complied with the charging rules and our systems and processes to build the charges were effective. They also confirmed that we reviewed the balance of charges between developers and other customers and demonstrated meaningful consultation with customers who were impacted by these arrangements.</p>

Publication	Main findings and outcomes
 <p>Charges Scheme (February 2020)</p>	<p>Every year we publish our Charges Scheme. This contains household and non-household end user charges.</p> <p>Independent assurance was provided by our external auditors, Jacobs and Deloitte. Deloitte completed a review of the tariff model to confirm that the functionality is correct. Jacobs reviewed the guidance and compared our approach to ensure that charges had been calculated from the tariff model correctly and regulatory requirements had been met.</p> <p>In addition, our Internal Audit department also carried out a billing audit. This audit confirmed that the tariffs have been included in our billing system correctly.</p>
 <p>Annual Report & Financial Statements (July 2019 and 2020)</p>	<p>Our Annual Report and Financial Statements (ARFS) are a legal requirement. They report on our strategy and provide detail on how we are governed and our performance in the last financial year. The ARFS is also part of our promise to deliver ‘integrated reporting’ which explains how we have and will create value for society and shareholders, outside of traditional financial measures, both now and in the future.</p> <p>Throughout the year, internal audit has completed audits on the controls in place within the financial systems.</p> <p>On the ARFS, external independent assurance was provided by Deloitte. Deloitte reviewed whether the information presented within our statutory accounts is true and fair. The audit also reviewed whether the accounts had been prepared in line with accounting policies.</p> <p>The information on our performance commitments was assured as part of the Annual Performance Report assurance by our external technical auditors, Jacobs.</p> <p>Matters identified through the audits were discussed and action was taken to close these before we published the document. Deloitte presented assurance information to the Board Audit Committee.</p>
 <p>Annual Performance Report (July 2019 and 2020)</p>	<p>Our Annual Performance Report (APR), provides detailed information on our performance against our customer outcomes and commitments and our financial performance. The external independent assurance on the information within our annual performance report was provided by Deloitte and Jacobs.</p> <p>We have included findings from the assurance reviews from Jacobs and Deloitte in our annual performance report.</p>
 <p>Bioresources Market Information (July 2019 and 2020)</p>	<p>Our Bioresources Market Information publication is an annual publication which includes the data that Ofwat ask us to publish to support the development of a bioresource treatment market, and to monitor its operation.</p> <p>Our Bioresources Market Information submission was assured by Jacobs to confirm that the information was accurate and generated in line with the guidance provided.</p> <p>Jacobs completed their audit on seven areas - an independent review of performance and reporting, methodology, assumptions, source data, clarity of audit trails and governance.</p> <p>Jacobs concluded that the information provided in the bioresources market information submission 2020, provides a fair, balanced and understandable summary of the company’s sludge production and sludge treatment facilities, and the contracts that have been agreed with third parties to provide bioresources services.</p>

Publication	Main findings and outcomes
 <p>PR14 Reconciliation (July 2019)</p>	<p>This publication is part of the PR19 business plan submission, which is the detailed plan to deliver services to our customers from 2020-2025. The PR14 reconciliation is the calculation of adjustments that take account of our past performance and the impact of incentive mechanisms from our performance in the PR14 business plan period from 2014-2019.</p> <p>Independent assurance for our PR14 reconciliation was provided by Deloitte and Jacobs, who assessed the submission for compliance with the Ofwat guidance, and the accuracy of our data and models to ensure our submission was complete and accurate.</p> <p>No material issues were identified and any actions arising from the audits were closed before submission.</p>
 <p>PR19 Blind Year Reconciliation of PR14 Incentive Mechanisms (July 2020)</p>	<p>Reconciling performance is a regulatory tool for making companies accountable for their performance against their PR14 final determination. A key part of the 2019 price review (PR19), is the assessment and calculation of adjustments to take account of Yorkshire Water's performance over the period 2015-2020. In December 2019, Ofwat published their Final Determination for 2019 price review (PR19). The reconciliation for performance over the 2015-2020 period, included in the PR19 final determinations was based on 2019/2020 forecasts, since outturn data was not available at that time. The information for 2019/2020 is treated as the 'PR19 blind year'. In order to make the appropriate adjustments now that 2019/2020 actual performance is known, this submission provides Ofwat with an update of our reconciliation, replacing the 2019/2020 forecasts with the 2019/2020 actual performance data, as also reported within our Annual Performance Report (APR), for 2019/2020.</p> <p>Independent assurance for our PR19 blind year reconciliation of PR14 incentive mechanisms was provided by Deloitte, who assessed the submission for compliance with the Ofwat guidance, and the accuracy of our data and models to ensure our submission was complete and accurate.</p> <p>No material issues were identified and any actions arising from the audits were closed before submission.</p>
 <p>Convergence Shadow Reporting (July 2019 and July 2020)</p>	<p>We are now at the beginning of AMP7, our new five-year business plan. There are 15 common performance commitments across the whole water industry, which came into place in April 2020 and we have already been 'shadow reporting' these measures. This means we have been monitoring our performance against the new performance commitments, ready to report to Ofwat in July 2020.</p> <p>This submission gives a comparison of performance against these between companies.</p> <p>Jacobs audited this data as part of our Annual Performance Report assurance. Jacobs checked our processes to obtain this information and made sure we complied with the new definitions, and any regulatory requirements.</p> <p>Jacobs confirmed that we had complied with the requirements and have included findings from the assurance reviews in our Annual Performance Report.</p>

Appendix A

Our detailed

publication

assurance for

2019/2020

This appendix provides a description of each of our publications for 2019/2020 and the assurance activities that we completed prior to their publication.

July 2019	PR14 Reconciliation	High risk
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What is it?

This publication is part of the PR19 business plan submission, which is the detailed plan to deliver services to our customers from 2020-2025. The PR14 reconciliation, is the calculation of adjustments that take account of our past performance and the impact of incentive mechanisms from our performance in the PR14 business plan period, from 1 April 2014 to 31 March 2020.

Why is it important to you?

Our PR14 reconciliation is important because adjustments from the reconciliation calculations are used in our PR19 plan. The calculation of the adjustments is complicated, and it is important that the adjustments are correct, to deliver a PR19 business plan that you can have confidence in.

Why is it important to us?

The PR19 business plan sets out the detailed plans on how we propose to deliver our services from 2020-2025. It is important that we get these plans right and meet Ofwat’s framework requirements and methodology which includes adjustments from the PR14 reconciliation. The information we submitted on 15 July 2018 for our PR14 reconciliation was included in our PR19 plan for the period 2020-2025.

Our assurance

Level 1	Level 2	Level 3
<p>The data and commentaries for our PR14 reconciliation were obtained from internal experts and assured data sources. The submission was made up of a number of reconciliations governed by the PR14 reconciliations rule book, which is published by Ofwat.</p> <p>The information for the submission, included detailed evidence on the information in the supporting PR19 data tables and commentaries.</p> <p>Our Regulatory Reporting Manager ensured the numbers and supporting calculations in the submission were accurate, reasonable and had been explained appropriately.</p>	<p>The level 2 assurance completed on our PR14 reconciliation submission was completed by senior managers or a director.</p> <p>Our level 2 assurance checked and approved the evidence to support the accuracy and completeness of the PR14 reconciliation information provided by level 1 assurance.</p>	<p>Level 3 assurance was provided by our independent technical assurer, Deloitte. They provided an assessment of the PR14 reconciliations, checked the supporting data tables on a sample basis, assessed the controls for the reconciliation process and checked whether the reconciliations met the Ofwat guidance including the PR14 reconciliations rule book.</p>

Publication

Our Board approved this publication. It can be viewed at: www.yorkshirewater.com/reports/

August 2019	PR19 Draft Determination Representation	High risk
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What is it?

Price reviews are one of the ways Ofwat sets the price, investment and service package that customers receive. Our PR19 submission is the detailed business plan we have worked on with our customers, which sets out how we intend to deliver services to our customers and the environment for the period 2020-2025. We published our PR19 business plan in September 2018. Ofwat evaluated this plan to reach a draft determination. The draft determination is a proposed contract between us, our customers and Ofwat, on the service we will provide and the prices we charge between April 2020 to March 2025. We had an opportunity to respond to the draft determination before Ofwat made its final determination in December 2019. Ofwat published their draft determinations on 18 July 2019 and we made a representation on the draft determination in August 2019.

Why is it important to you?

Our PR19 business plan is important because it aims to deliver affordable bills, great customer service, and long term resilience, using innovative plans that will deliver services to you, from 2020-2025.

Why is it important to us?

The PR19 detailed business plan was submitted to Ofwat on 3 September 2018. Throughout the Price Review process we have been keen to understand the needs and priorities of our customers and to reflect their views in the building of our plans. We wanted to make sure we got an appropriate and fair determination. Responding to the draft determination allowed us to provide further detail and evidence to enable Ofwat to consider making adjustments, before arriving at their Final Determination.

Our assurance		
Level 1	Level 2	Level 3
<p>Our Regulatory Compliance Programme Manager followed the wider assurance process making sure that the final document was accurate, accessible and easy to understand.</p> <p>We have named data providers and data managers who are responsible for providing accurate information in line with any guidance provided.</p>	<p>Our Price Review steering group reviewed the requirements and made sure the requirements had been met.</p> <p>Senior managers and directors reviewed the numerical and written information included in the representation. The report was reviewed by the Head of Regulation.</p>	<p>Level 3 assurance was provided by Jacobs and Deloitte.</p> <p>Our Draft Determination Representations were presented to the Yorkshire Forum for Water Customers.</p> <p>The results from our assurance were presented to and approved by Board Audit Committee.</p> <p>We obtained a Board Assurance Statement for this publication.</p>

Publication

Our assurance was presented to the Board Audit Committee, we obtained a Board Assurance Statement and published our Draft Determination Representation here. yorkshirewater.com/our-business-plan/

October 2019	Indicative Wholesale Charges Scheme	High risk
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What is it?

Each year we publish our Indicative Wholesale Charges Scheme. This publication contains primary and non-primary charges for retailers who operate in our region.

Why is it important to you?

It is important because our charges must be correct and accessible to retailers to enable them to budget and to build their business plans.

Why is it important to us?

Our charges scheme is important to us because we want to make sure that we provide consistent and reliable information to all our retailers.

Our assurance

Level 1	Level 2	Level 3
<p>All data inputs into the tariff model were from assured data sources, internal experts or forecasts. Our assurance was provided by our Regulatory Tariff Accountant and our Regulatory Finance Manager.</p> <p>Level 1 assurance included checks on any movements in our tariffs, assessing the effect on bills, and making sure that the effects were reasonable and could be explained.</p> <p>The team provided level 1 assurance to make sure we stayed in line with the four revenue price controls and adhered to guidelines.</p>	<p>Level 2 assurance was provided by the Tariff Steering Group, which included internal business experts in regulatory finance, retail services and tariffs.</p> <p>Level 2 assurance was also provided by the Head of Financial Planning and Pricing, the Head of Regulation and the Head of Household Retail. As part of the assurance process they documented their observations before signing off. Any queries raised were resolved prior to a Board review. A qualified member of our internal legal team agreed any changes to our charges scheme book.</p>	<p>Level 3 assurance was provided by our external auditors Jacobs and Deloitte. Deloitte completed a review of the tariff model to confirm that it was correct. Jacobs assured our approach against the guidance to confirm that we had applied it correctly and to confirm that charges were calculated from the tariff model and regulatory requirements had been met.</p> <p>A paper was submitted to Board Audit Committee which included the auditor’s findings and a comparison of charges.</p>

Publication

The Indicative Wholesale Charges Scheme is an annual publication. This has been approved by our Board. The published Board Assurance Statement can be viewed here: yorkshirewater.com/media/2048/indicative-wholesale-board-assurance-statement-october-2019.pdf

This publication can be seen here: yorkshirewater.com/media/2101/yorkshire-water-indicative-wholesale-charges-2020-21-what-s-changing.pdf

November 2019	Risks, Strengths and Weaknesses Statement	Medium risk
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What is it?

Each year we complete a risks, strengths and weaknesses exercise to identify the areas where we need to provide extra assurance on our published information.

Why is it important to you?

This statement is important because it includes the feedback we obtain from you on the areas of our reporting where there are risks, where we have performed well, or where we can still improve. Your feedback is valuable because it helps us build an assurance plan to improve how we will assure and report information to you.

Why is it important to us?

Our Risks, Strengths and Weaknesses Statement is important to us because it allows us to demonstrate how we have listened to you and will build more trust and confidence in the information we publish.

Our assurance

Level 1	Level 2	Level 3
<p>Our Risks, Strengths and Weaknesses Statement is owned by our Regulatory Compliance Programme Manager and has used specific data providers to provide the information we needed. Our assurance has included a check on the guidance from Ofwat and a gap analysis to make sure we didn't miss anything. We requested feedback from a wide range of stakeholders and used questionnaires which were customised to the audience who were asked specific questions.</p>	<p>Our level 2 assurance included a peer review of our statement from our Regulatory Investment and Group Communications teams.</p> <p>Our Level 2 assurance also included a review by senior management and by the Head of Regulation.</p> <p>They reviewed and approved our approach to compiling the statement and approved the final document.</p>	<p>The Yorkshire Forum for Water Customers reviewed our statement and provided us with feedback to build the content in this statement.</p>

Publication

The publication can be seen here: yorkshirewater.com/media/2203/yorkshire-water-risks-strengths-and-weaknesses-statement-november-2019.pdf

November 2019	Interim Financial Statements	Medium risk
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What is it?

Our Interim Financial Statements are a requirement of our investors and our regulator Ofwat. This statement is our report for the six-month period ending 30 September 2019.

Why is it important to you?

Our Interim Financial Statements are important to show that we are compliant with our investors and industry regulations. They are important to keep our stakeholders informed of our latest financial results.

Why is it important to us?

The primary purpose of our financial reporting is to make sure we are compliant with regulatory and banking requirements and to share a range of financial and other information. It is important that we respond to the needs of our customers and stakeholders, and provide an overview of our latest results.

Our assurance

Level 1	Level 2	Level 3
<p>Throughout the year, we applied level 1 assurance through our day-to-day accounting activities carried out by our accountants. This included maintaining accounting systems and performing end-of month reconciliations. We used named data providers and data managers to provide accurate financial information in line with the guidance that was provided.</p> <p>Our Interim Financial Statements were prepared by a Publication Manager who followed our wider assurance process to make sure that the final document was accurate, accessible and easy to understand.</p>	<p>Throughout the year, our level 2 assurance included management oversight of our accountants' activities. This included a senior management review of our monthly financial results and information.</p> <p>Before publication, the interim financial statements were reviewed by the Head of Finance, the Head of Regulation and our Board Audit Committee, before they were approved by the Board.</p>	<p>In applying our risk-based approach, we have determined that no level 3 assurance is required for this publication.</p>

Publication

The Interim Financial Statements are an annual publication approved by the Board. The publication can be seen here keldagroup.com/investors/document-library/yorkshire-water-financial-statements/

November 2019	Draft Assurance Plan	Medium risk
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What is it?

Each year we publish an Assurance Plan for the information that we provide. We publish our draft plan, followed by a period of consultation and we update the final plan based on the feedback we have received.

Why is it important to you?

Our Assurance Plan is important to give you confidence that our published information is accurate, accessible and easy to understand, otherwise we risk losing your trust and confidence. Our plan explains how we will carry out assurance to meet these objectives. Your feedback on our draft plan is valuable to build our final assurance plan.

Why is it important to us?

Our Assurance Plan is important because it makes sure that our assurance is carried out at the right time, is focused on higher-risk areas, asks the right questions and produces good evidence to support the statements we make. It also helps us continually improve our processes to provide you with information.

Our statement also identifies the key areas we will focus on with 'targeted assurance'.

Our assurance

Level 1	Level 2	Level 3
<p>Our Draft Assurance Plan was owned by our Regulatory Compliance Programme Manager and used data providers to provide the information we needed.</p> <p>Our level 1 assurance included a check on the guidance from Ofwat and a gap analysis to make sure we didn't miss any information that was needed.</p>	<p>Our level 2 assurance included a review by senior management and by the Head of Regulation. Collectively, they reviewed and approved our approach to compiling the draft assurance plan and approved the document before publication.</p>	<p>Our Draft Assurance Plan was presented to the Yorkshire Forum for Water Customers who provided us with their initial feedback which was considered in the development of the final assurance plan.</p> <p>This was also presented to the Board Audit Committee to review and approve.</p>

Publication

The Draft Assurance Plan was approved by the Board Audit Committee. It is published annually and can be seen here:

yorkshirewater.com/media/2206/29556_corporate-comms_ofwat-assurance_plan_19_web_aw.pdf

January 2020	Wholesale Charges Scheme	High risk
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What is it?

Each year we publish our Wholesale Charges Scheme. This publication contains primary and non-primary charges for retailers who operate in our region.

Why is it important to you?

It is important because our charges must be correct and accessible to retailers to enable them to confirm their business plans.

Why is it important to us?

Our Wholesale Charges Scheme is important to us because we want to make sure that we provide consistent and reliable information to all our retailers.

Our assurance

Level 1	Level 2	Level 3
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All data inputs into the tariff model were from assured data sources, internal experts or forecasts. Our assurance was provided by our Regulatory Tariff Accountant and our Regulatory Finance Manager. Level 1 assurance checked any movements in tariffs and assessed the effect on bills, making sure that the effects were reasonable and could be explained.

The team provided level 1 assurance to make sure we stayed in line with the four revenue price controls and adhered to guidelines.

Level 2 assurance was provided by the Tariff Steering Group, which included internal business experts in regulatory finance, retail services and tariffs.

Level 2 assurance was provided by the Head of Financial Planning and Pricing, the Head of Regulation and the Head of Household Retail. As part of this assurance process they documented their observations before signing off the charges. Any queries raised were resolved prior to Board review.

A qualified member of our internal legal team agreed any changes to our charges scheme book.

Level 3 assurance was provided by our external auditors Jacobs and Deloitte. Deloitte completed a review of the tariff model to confirm that it was correct. Jacobs assured our approach against the guidance to confirm that we had applied it correctly and to confirm that charges were calculated from the tariff model, and regulatory requirements had been met.

A paper was submitted to the Board Audit Committee which included the auditor’s findings and a comparison of charges.

Internal audit also carried out a billing audit to confirm that the tariffs have been correctly included in our billing system.

Publication

Our Board approve the Wholesale Charges Scheme and have published a Board Assurance Statement. Our published Wholesale Charges Scheme and Board Assurance Statement can be viewed here: yorkshirewater.com/business/wholesale-charges/

January 2020	Bulk Supply Charges	High risk
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What is it?

This publication sets out our charging arrangements for the provision of bulk supply of services to New Appointment and Variation organisations (NAVs), that operate within the Yorkshire Water region.

Why is it important to you?

This charging information is important to NAVs and developers so that they can evaluate opportunities and understand the relevant upstream and downstream costs that support the prospective new NAV networks.

Why is it important to us?

Our bulk supply and discharge charges support new markets in the water sector in England. It is important to us that NAVs can consider new developments and compete fairly with other market participants.

To enable this, we need to publish charges that are clear, accurate and meet the Ofwat guidance.

Our assurance

Level 1	Level 2	Level 3
<p>All our data input into our Bulk Supply Tariff Model was taken from various business sources, some of which had already been assured.</p> <p>We reviewed and updated our tariff model, and the outputs were assessed for their impact on customers to make sure they were reasonable. The model and publication were informed by stakeholders and included outputs from consultation.</p> <p>Our data managers made sure the publication was completed on time and in line with Ofwat guidance.</p>	<p>Our level 2 assurance used named senior managers and directors to review and approve the tariffs and information provided for this scheme.</p> <p>Our level 2 assurance consulted with our internal Tariff Steering Group, which includes business experts in regulatory finance, retail services and tariffs on the content of our Bulk Supply Charging Scheme.</p>	<p>Our technical assurance provider, Jacobs carried out assurance to check that our Bulk Supply Tariff Model and our charges publication were accurate and had been developed in line with the Ofwat guidance.</p> <p>Jacobs provided assurance that we had included suitable feedback from the stakeholder consultation process to compile our charges scheme.</p>

Publication

We published our charging arrangements for bulk supplies on our website. It can be seen here: yorkshirewater.com/developers/new-appointments-and-variations/

February 2020	Charging Arrangements for New Connection Services	High risk
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What is it?

Each year we publish our Charging Arrangements for New Connection Services based on Ofwat rules. These are charges for new connections made into our existing networks, including connections for new housing developments. Accompanying this document is a Bill Stability Impact Assessment which is also assured and published.

Why is it important to you?

This information is important because the costs of connection services should be accurate, cost reflective and easy to understand.

Why is it important to us?

Our Charging Arrangements for New Connection Services are important for us to maintain stakeholder confidence, encourage competition and new developments, and to prevent disputes and claims.

Our assurance

Level 1	Level 2	Level 3
<p>Our publication for Charging Arrangements for New Connection Services was owned by our Regulatory Change Manager.</p> <p>They used expert data providers to provide the information that was needed. Level 1 assurance was provided by a Tariff Specialist and evidenced through a sign off by our Developer Services Manager.</p>	<p>Level 2 assurance for these charging arrangements was delivered through peer review and challenge sessions with experts from the Developer Services and Regulation department.</p> <p>The data reviewed independently by the D-Mex Readiness Project Manager and signed off by the Regulatory Strategy Manager and Manager of Developer Services.</p>	<p>Our Level 3 assurance was provided by our external assurance provider, Jacobs.</p> <p>Their independent challenge and assurance focused on our compliance with the charging rules, our systems and processes, and the balance of charges between developers and other customers. In addition, they considered how we demonstrated meaningful consultation with customers who were impacted by these arrangements.</p> <p>A paper was submitted to the Board Audit Committee for sign off on the assurance of our charging arrangements which included a summary of the level 3 audit findings.</p>

Publication

Our Board approved this publication and published a supporting Board Assurance Statement alongside our charging arrangements. Both can be viewed here: yorkshirewater.com/developers/developer-charges/

February 2020	Charges Scheme	High risk
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What is it?

Every year we publish our Charges Scheme. This contains household and non-household end user charges.

Why is it important to you?

Our Charges Scheme is important because it sets out our charges for the next twelve months.

Why is it important to us?

Our Charges Scheme is important because the information in our published Charges Scheme must be consistent and reliable. This publication is a condition of our licence and must meet Ofwat rules.

Our assurance

Level 1	Level 2	Level 3
<p>All data inputs into the tariff model were obtained from assured data sources, internal experts or forecasts. Our assurance was provided by our Regulatory Finance Manager.</p> <p>Level 1 assurance checked any movements in tariffs and assessed the effect on bills, making sure that the effects were reasonable and could be explained.</p> <p>The team provided level 1 assurance to make sure we stayed in line with the four revenue price controls and the published charges principles and guidelines.</p>	<p>Level 2 assurance was provided by the Tariff Steering Group, which included internal business experts in regulatory finance, retail services and tariffs.</p> <p>Level 2 assurance was also provided by the Head of Financial Planning and Pricing, the Head of Household Retail and the Head of Regulation. As part of this assurance they documented their observations before signing off.</p> <p>Any queries raised were resolved prior to Board review.</p> <p>A qualified member of our internal legal team agreed any changes to our charges scheme book.</p>	<p>Level 3 assurance was provided by our external auditors, Jacobs and Deloitte. Deloitte completed a review of the tariff model to confirm that it was correct. Jacobs assured our approach against the guidance to confirm that we had applied it correctly and to confirm that charges were calculated from the tariff model, and regulatory requirements had been met.</p> <p>Internal Audit also carried out a billing audit to confirm that the tariffs have been included in our billing system correctly.</p>

Publication

Our Board approve the Charges Scheme and have published a Board Assurance Statement alongside our charging scheme. Both can be viewed here: yorkshirewater.com/our-charges/

March 2020	Final Assurance Plan	Medium risk
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What is it?

Each year we publish a Final Assurance Plan for the information we provide. Our Final Assurance Plan is based on our draft plan which is updated from feedback from customer and stakeholder consultations.

Why is it important to you?

Our Assurance Plan is important to give you confidence that our published information is accurate, accessible and easy to understand. If we don't get this right, we risk losing your trust and confidence. Our final assurance plan tells you how we will carry out specific assurance and checks on our data and publications to meet these objectives.

Why is it important to us?

Our Assurance Plan is important because it makes sure that our assurance is carried out at the right time, is focused on higher-risk areas, asks the right questions and produces good evidence to support the statements we make. Our plan also identifies the key areas we will focus on with 'targeted assurance'.

Our assurance

Level 1	Level 2	Level 3
<p>Our Final Assurance Plan was owned by our Regulatory Assurance Manager who was hired this year to support the delivery of the assurance over our publications. They are supported by defined data providers who provided the information needed.</p> <p>Level 1 assurance included a final check of the guidance from Ofwat to make sure we hadn't missed any information that was needed.</p>	<p>Level 2 assurance on our Final Assurance Plan included a review by senior management and the Head of Regulation. They reviewed and approved our approach and the final document before it was published.</p>	<p>In applying our risk-based approach, we determined that level 3 assurance is not required for this publication.</p>

Publication

Our Final Assurance Plan is an annual publication which you can view here: yorkshirewater.com/reports

April 2020	Condition R Compliance Code Statement	Medium risk
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What is it?

Our Condition R Compliance Code Statement confirms we have met specific obligations under our licence. It provides transparency to our customers and regulators on how we operate in competitive markets.

Why is it important to you?

Our Condition R Compliance Code Statement is important because it demonstrates how we work in a competitive market and provides assurance that we treat all those who do business with us fairly.

Why is it important to us?

This statement is important to us because we fully support competition in our industry and we recognise our regulatory and statutory obligations under Competition Law. This statement is a summary for our regulators of the controls we apply to enable us to operate fairly in competitive markets.

Our assurance

Level 1	Level 2	Level 3
<p>Our legal department and Compliance Officer reviewed the appropriate guidelines and prepared a draft compliance code that has been published.</p> <p>Throughout the year, we used our Compliance Monitoring Plan to test the controls we have in place to ensure compliance with Competition in the retail market.</p>	<p>Level 2 assurance was provided by our Senior Competition Lawyer and the Head of Regulation who approved the publication to proceed to the Board for sign off.</p>	<p>In applying our risk-based approach, we determined that no independent assurance was required for this publication.</p>

Publication

The Board reviewed and approved this publication. The publication can be seen at: yorkshirewater.com/retailers

May 2020	Water Resources Market Information Submission	Medium risk
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What is it?

Our Water Resources Market Information Submission was published at the same time as our Water Resourced Management Plan (WRMP). The information is published to promote market development and to provide, manage and develop water resources, demand management and leakage activities, and encourage efficiencies through new markets.

Why is it important to you?

This is important because it helps interested parties identify where to look for new opportunities in the water market. This will improve the water services provided to you in the future.

Why is it important to us?

It is important to us that third parties and stakeholders have the right information to make proposals for improvements in the water resources market. These opportunities can only be investigated by interested parties if we publish information that is complete and accurate, and accessible to those who want to use it.

Our assurance

Level 1	Level 2	Level 3
Our Regulatory Compliance and Assurance Team made sure that the data managers and providers provided data and completed this submission within the relevant timescales and in line with requirements and regulatory guidelines.	<p>We used named senior managers and directors to review and approve the information provided.</p> <p>We carried out a peer review of the information and the submission before publication.</p>	In applying our risk-based approach, we determined that no independent assurance was required for this publication.

Publication

You can view our Water Resources Market Information Submission here : yorkshirewater.com/resources/

May 2020	Water Resources Management Plan	Medium risk
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What is it?

Our Water Resources Management Plan (WRMP) sets out how we plan to maintain the balance of water supply and demand across the Yorkshire region. This plan takes a long-term view of at least 25 years.

Why is it important to you?

Our WRMP is important because it forecasts how much water we will need to have available to supply our customers in the future, based on drought, climate change and population forecasts, and our environmental obligations. Our WRMP makes sure we have the right plans to use water efficiently, including how we will reduce leakage and promote water efficiency, which are all factors that we understand are important to you.

Why is it important to us?

The WRMP is important because it is our main responsibility to provide a clean, safe and continual supply of water now, and 25 years into the future. The WRMP must be correct, otherwise, we risk not being able to meet our primary responsibility to supply water based on clear plans that will also protect our natural environment.

Our assurance

Level 1	Level 2	Level 3
<p>Our named data providers and data managers were responsible for making sure that the information they provided was accurate and in line with the WRMP guidance.</p> <p>Our Regulatory Compliance and Assurance Team and appropriate senior managers made sure that the data providers and data managers were technically skilled to be able to provide accurate data that meets regulatory guidance to the relevant timescales.</p>	<p>The Head of Asset Strategy and the Head of Regulation reviewed and approved the information we provided.</p> <p>A peer review of the information and the submission was also carried out.</p>	<p>We submitted a draft version of this publication to Defra for their review. Defra provided the approval to publish. As there were no material changes to make to the document, and following the approval to publish from Defra, we determined there was no requirement for level 3 assurance.</p>

Publication

Our Water Resources Management Plan was published and can be viewed here: yorkshirewater.com/resources/

<p>July 2019 & 2020</p>	<p>Annual Report and Financial Statements (ARFS)</p>	<p>Medium risk</p>
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What is it?

Our Annual Report and Financial Statements (ARFS) are a legal requirement. They report on our strategy and provide detail on how we are governed and our performance in the last financial year. The ARFS is also part of our promise to deliver ‘integrated reporting’ which explains how we have, and will create value for society and shareholders, outside of traditional financial measures, both now and in the future.

Why is it important to you?

Our ARFS are important to show that we are compliant with our investors and industry regulations. The ARFS are important to keep you informed on our latest financial results and strategies. The reporting is prepared to meet your needs as an integrated report, including financial and non-financial measures of our performance.

Why is it important to us?

Our ARFS are important because they share detailed financial and other information with our stakeholders. They provide financial reporting on our performance, including additional information for specialist groups and at the same time meet our statutory legal requirements. They also include results from ‘integrated reporting’ on the economic, environmental and social impacts of our operations which our customers are increasingly interested in hearing about.

Our assurance

Level 1	Level 2	Level 3
<p>To deliver level 1 assurance, throughout the year, our accountants performed day-to-day accounting activities based on defined and documented procedures.</p> <p>To produce the ARFS we had named data providers and data managers who were responsible for providing accurate information to support the financial guidance and regulations, which are in place to prepare this publication.</p> <p>Our Publication Manager for the ARFS followed a wider assurance process to make sure that the final document was accurate, accessible and easy to understand.</p>	<p>To provide level 2 assurance, throughout the year, management oversaw the activities performed by our accountants. This included monthly reviews and reporting on our financial information. This activity formed part of the in-built ‘three levels of assurance’ process, for activities within our finance teams. This assurance was mapped through activity carried out by our Integrated Assurance team.</p> <p>Before publication, the financial statements were reviewed and approved by the Head of Finance.</p>	<p>Our financial auditors, Deloitte, audited the year-end information in our statutory accounts to confirm that it was true and fair, based on company affairs, and that the accounts had been prepared in line with our underlying accounting policies. The information on our performance commitments in the ARFS was assured by our external technical auditors, Jacobs.</p>

Publication

Our assurance was presented to the Board Audit Committee, we obtained a Board Assurance Statement and published the ARFS including the independent auditors report here: yorkshirewater.com/reports/

July 2019 & 2020	Annual Performance Report (APR)	High risk
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What is it?

Our APR, provides detailed information on our performance against our customer outcomes and commitments, and our financial performance. It is published in July 2020 and reports on our performance from 1 April 2019 to 31 March 2020.

Why is it important to you?

Our APR is important because it tells you how well we are delivering our commitments, including our service levels, cost information and financial performance. You can also compare our performance with other companies in the industry.

Why is it important to us?

Our APR is important because it summarises how well we have delivered against the outcomes and performance commitments we agreed for the period 2015-2020. Our APR also reports information on how well we have delivered services to our customers, including financial information on income, costs, assets and liabilities in our regulatory accounts.

Our assurance

Level 1	Level 2	Level 3
<p>The process for the collection of data in our APR is certified to the ISO9001 Quality Management standard. This process required data providers and data managers to provide information to be included in the detailed sections in our APR. The same process was followed for production and approval of written narrative for the report which has been assured by appropriate technical owners.</p> <p>The governance section of our APR was produced by our Company Secretary team in line with the requirements and approved by their senior managers.</p> <p>Our Regulatory Compliance Programme Manager followed our wider assurance process to make sure that the overall APR document was accurate, accessible and easy to understand.</p>	<p>Our level 2 assurance used the APR working group, and steering group, to review, provide input and assurance on the technical requirements of our APR to ensure that we met the timetable for delivery.</p> <p>Our Regulatory Assurance Manager and Regulatory Reporting Manager reviewed the data signed off by the data managers to ensure accuracy with previous reports and all information is in line with regulatory requirements.</p> <p>Senior managers and directors have reviewed the numerical and written information included in our APR. Our final APR was reviewed and approved by the Head of Regulation.</p>	<p>Level 3 assurance was provided by our technical auditors, Jacobs and included detailed assurance of our performance commitment results, including the information presented in the APR data tables.</p> <p>Level 3 assurance on our financial information, including our regulatory accounts, was completed by Deloitte to ensure we met the requirements in Ofwat’s regulatory accounting guidelines (RAGs).</p> <p>Our performance was presented to the Yorkshire Forum for Water Customers who challenged us on how we are delivering for customers against our commitments.</p>

Publication

The Annual Performance Report is an annual publication that is a requirement of our licence. The APR is reviewed and approved by the Board. Our report can be found at: yorkshirewater.com/reports/

The publication includes a Board Assurance Statement and an assurance statement from our external auditors, Deloitte and Jacobs.

July 2019 & 2020	Performance Summary	Medium risk
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What is it?

Our Performance Summary gives an overview of how we have performed against the promises we made to our customers in 2015. The summary presents the results under our seven customer outcomes and the 26 performance commitments that sit under them.

Why is it important to you?

Our Performance Summary describes our performance against our commitments including the rewards and penalties we have incurred. This is a summary of the detailed information in our APR, in a shorter and simpler format. The performance summary we published in July 2020 reports our performance from 1 April 2019 to 31 March 2020. As this is the final year of the five-year business plan period (asset management period 6 or AMP6), this also reports how we have performed against our commitments that have a final calculation at the end of this five-year period.

Why is it important to us?

Our Performance Summary is important to us so our customers can clearly see how we are doing in delivering water and waste services as the leading, responsible business, that we strive to be. It's important because it explains the detailed information in our APR in a simple and clear way.

Our assurance

Level 1	Level 2	Level 3
<p>All the information included within the Performance Summary is obtained from the Annual Performance Report (APR).</p> <p>We have regularly monthly reporting of our performance commitments to Board. We have Delivery Assurance Groups (DAGs) that review and challenge our monthly performance. They set corrective actions when we deviate from our targets. We have defined data providers and data managers who provided the information on our performance commitments.</p> <p>We assigned a Regulatory Programme Manager to create the summary and pull the information from the and make sure it was accurate, accessible and easy to understand.</p>	<p>Throughout the year, managers oversaw our performance reporting activities. Performance commitments are reviewed as part of internal business planning at the Board Investment Committee (BIC) and reviewed again for year-end reporting and forecasting. Any issues arising in the delivery of our performance commitments may involve further scrutiny from BIC in order to approve funding for improvement and/or monitor performance.</p> <p>Senior managers confirmed that the data had been prepared in line with the procedures. Senior managers confirmed that they had confidence in our data and that trends were understood and explained, and any material assumptions we made were also explained.</p> <p>The Regulatory Compliance and Assurance Team made sure that information was provided in line with the guidance.</p>	<p>In applying our risk-based approach, we recognised that level 3 assurance had been applied to the data and commentaries in our performance summary during our APR assurance processes.</p>

Publication

The Performance Summary is approved as part of the APR approval process. The Performance Summary is published on our website alongside our APR: yorkshirewater.com/reports/

July 2019 & 2020	Bioresources Market Information	High risk
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What is it?

Our Bioresources Market Information is an annual publication which includes the data that Ofwat ask us to publish to support the development of a bioresource treatment market, and to monitor its operation.

Why is it important to you?

This information is important because it helps to promote market development in bioresources activities. If we publish the right information, markets can inform and encourage efficiencies and new ideas for the benefit of customers, the environment and to wider society from new developments in the bioresource market.

Why is it important to us?

This publication is important to us because the creation of the bioresources treatment market will drive efficiency, boost resilience and deliver innovation within our industry. It is important for us to deliver data that is accurate, reliable and accessible, and will allow conversations between us and third parties to explore new market opportunities.

Our assurance

Level 1	Level 2	Level 3
<p>To deliver our level 1 assurance we used our data assurance process to make sure the data in our submission was complete and accurate.</p> <p>We had named data providers and data managers who provided information in line with Ofwat guidance.</p> <p>Our publication was owned by the Regulatory Reporting Manager who followed our wider assurance process, to make sure the submission was completed on time and meets the requirements and guidance.</p>	<p>Our level 2 assurance was provided through our senior management review and sign off.</p> <p>A peer review of the detailed information and the submission was carried out by the Bioresources Steering Group.</p> <p>We also used named senior managers to review and approve the information in our publication.</p> <p>Finally, a senior manager approved the report before publication.</p>	<p>Our technical auditor, Jacobs completed level 3 assurance to confirm that our data is accurate and met the guidance. They reviewed and tested our methodologies, processes and the supporting evidence on which our market information submission was based.</p> <p>They checked the accuracy of our information and the explanations of our activities to make sure they were reasonable.</p> <p>Jacobs provided an assurance statement, which is included in this publication. This advises that they are happy with the data in this publication.</p>

Publication

The Bioresources Market Information is published on our website: yorkshirewater.com/about-us/what-we-do/bioresources/

July 2019 & 2020	Risk and Compliance Statement	High risk
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What is it?

Our Risk and Compliance Statement sets out how we have complied with the statutory, licence and regulatory obligations where Ofwat is our regulator. Our statement in July 2020 covers the reporting year 1 April 2019 to 31 March 2020 for all obligations, except environmental compliance and water quality parameters which are reported separately.

Why is it important to you?

The most important responsibilities we have are to provide an uninterrupted supply of clean, safe drinking water and to remove waste water. These must be achieved in a way that is safe, compliant, and protects and enhances our natural environment. This statement is a summary of how we have met with our regulatory and legal obligations.

Why is it important to us?

The statement is important to us because it sets out how we have complied with the statutory, licence and regulatory obligations where Ofwat is our regulator. It demonstrates our clear accountability to both our customers and to Ofwat.

Our assurance

Level 1	Level 2	Level 3
<p>The day-to-day activities we carry out are governed by a range of legislation and the requirements of our licence. To make sure we comply with these requirements we use experts to understand the detail in the requirements and embed compliant policies and procedures for colleagues to apply. This delivers much of our level 1 assurance.</p> <p>This expertise includes, Legal Services, the Regulation team, Company Secretariat, Financial Services, Health and Safety, Asset and Process Engineers and Human Resources. These teams draw on deeper external expertise to ensure that any changes to our obligations are appropriately applied.</p> <p>The statement was owned by the Regulatory Programme Manager who followed the wider assurance process to make sure that our final document was accurate, accessible and easy to understand.</p>	<p>Compliance with approved policies and procedures was monitored through our business-as-usual level 2 assurance activities. Our assurance was mapped to ensure effective coverage and escalation of issues.</p> <p>Our delivery of integrated assurance through day-to-day activities has been mapped and improved by our Integrated Assurance team.</p> <p>To support this approach, all our senior leaders provided assurance over their team's compliance with relevant legislation, regulation and governance by completing an annual Control and Risk Self-Assessment (CRSA). The results of our CRSA were triangulated with other sources of assurance to make sure our level of compliance was understood.</p> <p>Our Risk and Compliance Statement was reviewed by senior managers and directors with final approval from a senior manager.</p>	<p>Our Audit Risk and Assurance team completed a detailed audit of our CRSA. They checked the accuracy and consistency on the level of compliance with the relevant legislation that is reported in our Risk and Compliance statement.</p> <p>We presented the statement and our assurance to the Board Audit Committee.</p>

Publication

The Risk and Compliance Statement is approved by the Board. It is published within the APR and as a separate document. It can be viewed at:

yorkshirewater.com/reports/

July 2020	PR19 Blind Year Reconciliation of PR14 Incentive Mechanisms	High risk
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What is it?

At the 2014 Price Review (PR14), Ofwat introduced a number of incentive mechanisms that had the potential to reward or penalise companies where they out or under-performed against agreed targets for improving performance for customers. Reconciling performance is a regulatory tool for making companies accountable for their performance against their PR14 final determination. A key part of the 2019 Price Review (PR19) is the assessment and calculation of adjustments to take account of Yorkshire Water’s performance over the period 2015-2020.

In December 2019, Ofwat published their Final Determination for 2019 Price Review (PR19). The reconciliation for performance over the 2015-2020 period included in the PR19 final determinations was based on 2019/2020 forecasts, since outturn data was not available at that time. The information for 2019/2020 is treated as the ‘PR19 blind year’. In order to make the appropriate adjustments now that 2019/2020 actual performance is known, this submission provides Ofwat with an update of our reconciliation, replacing the 2019/2020 forecasts with the 2019/2020 actual performance data, as also reported within our Annual Performance Report (APR) for 2019/2020.

Why is it important to you?

Our PR19 blind year reconciliation is important to make sure our charges for the next five years are based on actual rather than forecasted performance.

Why is it important to us?

The PR19 business plan sets out the detailed plans on how we propose to deliver our services from 2020-2025. It is important that we get these plans right and meet Ofwat’s framework requirements and methodology which includes adjustments from the PR14 reconciliation. The PR19 blind year reconciliation ensures any differences from the forecasts previously submitted are appropriately adjusted for based on our actual performance during 2019/2020.

Our assurance

Level 1	Level 2	Level 3
<p>The data and commentaries were obtained from internal experts and assured data sources. The submission was made up of a number of reconciliations governed by the PR14 reconciliations rule book which is published by Ofwat.</p>	<p>The level 2 assurance completed on our PR14 reconciliation submission was completed by senior managers or a director.</p> <p>Our level 2 assurance checked and approved the evidence to support the accuracy and completeness of the PR14 reconciliation information provided by level 1 assurance.</p> <p>An independent review of the submission against the requirements was completed.</p>	<p>Level 3 assurance was provided by Deloitte. They checked the data tables on a sample basis, assessed the controls for the reconciliation process and checked whether the reconciliations met the Ofwat guidance including the PR14 reconciliations rule book.</p>

Publication

Our Board approved this publication. It can be viewed at: yorkshirewater.com/reports/

July 2020	Convergence Shadow Reporting	High risk
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What is it?

We are now at the beginning of AMP7, our new five-year business plan. There are 15 common performance commitments across the whole water industry. This allows a comparison of performance between companies.

Over the past few years, we have been working with other companies in the water industry to define the common performance commitments, to understand the new definitions and to ensure there is consistency of reporting across the industry.

These new common performance measures came into place in April 2020, and we have already been ‘shadow reporting’ these measures to practice obtaining this information and to provide transparency to Ofwat on our journey towards being able to comply in full with the new definitions. In July 2020, we will provide our final update to Ofwat to show our compliance on reporting using the new definitions, which we will then report within the Annual Performance Report (APR), in July 2021.

Why is it important to you?

These new measures will allow you to see how we are performing against other companies in the industry.

Why is it important to us?

We want to know that we are reporting compliantly against the new definitions so that we can compare our performance against industry performance.

Our assurance		
Level 1	Level 2	Level 3
<p>We followed the same processes that we have in place for data collection within the APR. This process is certified to the ISO9001 Quality Management Standard.</p> <p>Data providers and data managers provided the data against the new definitions and assessed how compliant the data is against the elements of the definition. A procedure document was submitted to ensure consistency of reporting between years.</p>	<p>Our Regulatory Compliance and Assurance Team, and APR Steering Group review and provide input and assurance on the technical requirements for our APR and make sure we are meeting the timetable for delivery.</p> <p>Senior managers and directors reviewed the numerical and written information included in the Convergence Shadow Reporting Submission.</p> <p>Our final submission was reviewed and approved for publication by our Head of Regulation.</p>	<p>Level 3 assurance was provided by our technical auditors, Jacobs.</p> <p>The results from our assurance are presented to and approved by BAC.</p> <p>We obtained a Board Assurance Statement for the Annual Performance Report and this submission is part of that process.</p>

Publication

This has been submitted to Ofwat.

July 2019 & 2020	Data Assurance Summary	Medium risk
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What is it?

Our Data Assurance Summary summarises the risk-based assurance we have completed on our 2019/2020 performance information. It summarises the main findings from the assurance we defined in our final assurance plan.

Why is it important to you?

This summary is important because it provides you with the outcomes of our assurance on targeted areas and the assurance on each of our publications. It is published to give you trust and confidence in our published data and information.

Why is it important to us?

Our Data Assurance Summary is important because we explain how we have assured our published information and the findings from our assurance activities. It is important because we want to make sure our customers and stakeholders can be sure of the quality of our published information and have trust and confidence in us as a responsible business.

Our assurance		
Level 1	Level 2	Level 3
<p>The level 1 assurance on our Data Assurance Summary was managed and documented by a Regulatory Assurance Manager in line with the guidance from Ofwat. Our Regulatory Assurance Manager followed the wider assurance process making sure that the document was written in a format which was accurate, accessible and easy to understand.</p>	<p>Our Data Assurance Summary was delivered at the same time as our APR which included level 2 assurance from our APR Steering Group who reviewed the requirements and made sure we met those requirements.</p> <p>This publication was reviewed and approved by our Regulatory Compliance and Assurance Manager.</p>	<p>In applying our risk-based approach, we determined that no independent assurance was required for this publication.</p>

Publication

This is our Data Assurance Summary. It is published on our website.

July 2019 & 2020	Annual Board Statement	Low risk
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What is it?

As part of the Annual Performance Report, we have published a short statement on how we are delivering against our responsibilities to everyone who depends on our services and how we have set our future aspirations. This statement explains:

- how we set our ambitions and targets and how the company is performing against them.
- how we are thinking dynamically about the expectations of customers in the long term and how our commitments do not remain static.
- the relationship between our financial performance, executive rewards, and delivery of services to our customers and how these impact future plans.

Why is it important to you?

This statement provides information on how we are providing our services to you and will help provide confidence in how we set our ambitions in the short and long term. This statement also helps to provide transparency about the extent to which rewards are fair and in line with the benefits that customers receive.

Why is it important to us?

It is important that we provide the information requested by Ofwat and by our customers in a way that assists transparency in our operations.

Our assurance		
Level 1	Level 2	Level 3
Our Regulatory Compliance and Assurance Manager followed the wider assurance process making sure that the final document is accurate, accessible and easy to understand.	Senior managers and directors reviewed information included in the annual statement. The report has been reviewed by the Head of Regulation and the Company Secretary.	In applying our risk-based approach, we determined that no independent assurance was required for this publication. The Board reviewed and approved the statement.

Publication

The Board Statement was reviewed and approved by the Board. The Annual Board Statement is published annually. This is published within the APR and as a separate report. It can be viewed here: yorkshirewater.com/reports/

Monthly	Operational Market Services Performance Reports	Low risk
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What is it?

This reporting relates to information we need to provide for the services we deliver to the non-household retail market, which opened in April 2017. The reports are sent to the retail market operator, Market Operator Services Ltd (MOSL). They use this data to publish an industry comparison report every month.

Why is it important to you?

This information is important to retailers in the non-household retail market so they can see and compare how we are performing when we deliver operational service to non-household customers. Ofwat use this information to make sure we are performing as expected as a water wholesaler in the non-household retail market.

Why is it important to us?

Our Operational Market Performance data is important to us because it helps us monitor our wholesale service to non-household customers to ensure it is in line with the service levels we are required to work to.

Our assurance

Level 1	Level 2	Level 3
<p>Level 1 assurance was provided by our dedicated Wholesale Service Desk who monitor our daily service level performance. We use our systems to track performance and produce data which has been reviewed by our data providers.</p> <p>Our Market Operations Team monitored trends and produced reports which were reviewed monthly to identify any issues.</p> <p>Data managers checked these reports prior to submission to make sure the information we reported met the requirements.</p>	<p>Our level 2 assurance was provided by a dedicated Compliance Team who checks that the data submitted each month in our Operational Market Reports was accurate and in line with the requirements.</p>	<p>In applying our risk-based approach, we determined that no independent assurance was required for this publication.</p>

Publication

Our monthly performance is published by MOSL on the MOSL website: mosl.co.uk/

As required	Casework (information to Ofwat as required)	Medium risk
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What is it?

Casework involves providing information to Ofwat relating to customer disputes about legislation, pricing, and other licence related issues.

Why is it important to you?

Ofwat casework is important to our customers and stakeholders because it allows them to raise a dispute or challenge with the regulator in relation to our actions and company policy.

Why is it important to us?

Ofwat casework is important to us because it provides customers and stakeholders with confidence that our information is accurate, and that our responses to Ofwat are substantive.

Our assurance

Level 1	Level 2	Level 3
<p>Level 1 assurance and specific casework investigations is assigned to a case manager who will investigate and gather the appropriate information we need to report back to Ofwat.</p> <p>The case is reviewed by senior management who draft an initial response document.</p>	<p>Level 2 assurance is completed by senior managers within our Household Retail department who review and approve the information in our response.</p> <p>They review, provide comments and approve the final response to a casework request before it is sent to Ofwat.</p>	<p>In applying our risk-based approach, we determined that no independent assurance is required for this publication.</p>

Publication

During 2019/2020 we are pleased to report that we did not receive any Ofwat casework.

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