



from
**Southern
Water** 

Final Assurance Plan

Our assurance programme
for our performance
information in 2025–30

31 March 2026



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1. Introduction

Southern Water supplies essential water services to 2.6 million customers, and wastewater services to more than 4.6 million customers across Sussex, Kent, Hampshire, and the Isle of Wight. We provide water for life to enhance health and wellbeing, protect and improve the environment and sustain the economy.



We published our Assurance Strategy and Draft Assurance Plan for 2025–30¹ performance reporting for consultation in November 2025. We set out our initial assessment of where assurance will be most important in the five-year cycle and welcomed views on this and in particular: what regulatory information is most important to our customers; the level of risk associated with that information; and whether our proposed assurance plans are appropriate to mitigate those risks. This document presents our Final Assurance Plan for performance reporting for the entire five-year Asset Management Period (AMP8) 2025–30. We will review this document annually to ensure it remains accurate; if changes are required, we will publish an updated version.

In this exciting and unprecedented period of investment with significantly increased scrutiny of our performance, we lean on the programme of improvements we have embedded to continue to ensure our regulators and other stakeholders can trust the data that we report.

We use assurance to thoroughly test information we publish in a manner that is independent and verifiable. Our Board, via the Audit Committee, oversees this process. We aim for the assurance that we perform and commission to provide our internal and external stakeholders with sufficient comfort over the robustness and quality of the information that we report.

¹[assurance_strategy_and_draft_assurance_plan_2025_amp8.pdf](#)

2. Context

The Water Industry is experiencing a major shift through significant regulatory reform and investment, calling for consolidated oversight, evolving assurance expectations, and increased transparency that will help reshape delivery, compliance, and company–regulator relationships.

This period of regulatory transition is an opportunity for us to build stakeholder trust and confidence through strong assurance, governance, and proactive engagement, that maintain confidence and demonstrate our readiness to adapt in these changing times and circumstances.

We are setting our Final Assurance Plan in a truly transformative period, when the roles and structures of our Regulators are under formal review and will likely change during the delivery of this Plan. Notwithstanding any associated uncertainties, we are committed to understanding how these changes in regulation will impact our activities. We will continue to work effectively with our regulators, customers, and stakeholder on how we can enhance supervisory requirements, harness the growth of new digital technologies and continue to provide reliable high-quality data and accurate information.

2.1 Ofwat

As part of its agreement on funding for our business plan, our regulator Ofwat has set out a number of performance commitments and price control deliverables that we are required to deliver. In addition to ensuring our performance data is transparent and accurate, we also seek to ensure customers and stakeholders can access and understand relevant information.

2.2 Our Business Plan for the period 2025–30

We have just completed the first year of a new five-year Asset Management Period (AMP8) which will take us from April 2025 to end of March 2030. Our 2025–30 business plan has been published on our website here; [Our plans 2025–30](#).

Our Final Determination was published by Ofwat in December 2024 and sets out a number of performance commitments associated with pre-determined financial incentives based on their achievement. Ofwat also introduced a set of price control deliverables (PCD)s with associated financial incentives based on the PCD outcome and/or outputs to deliver as part of the scheme or the group of schemes. We are required to report progress on these, and other enhancement schemes to Ofwat. We will ensure we can accurately report against these and identify the risks and controls to support provision of accurate information about our performance.

Last year, we challenged Ofwat's Final Determination and appealed to the Competition and Markets Authority (CMA), alongside four other companies. Their provisional determination in October 2025 allocated extra revenue funding and their Final Determination was released earlier this month. The CMA's Final Determination is broadly in line with the provisional findings they shared in October

2025. The Final Determination means the average bill will increase by a further 2.5% above Ofwat's original allowance. However, these changes will not affect customer bills until 2027–28.

For AMP8, Ofwat has increased their expectations for assurers, and greater accountability is reflected in our AMP8 framework documents. Ofwat require us to set out our assurance strategy, outlining:

- our approach to providing internal and third-party assurance (to meet the requirements set out in Ofwat's document 'PR24 final determinations: Expenditure allowances – assurance requirements for the delivery of enhancement schemes appendix'²);
- the type of and coverage of assurance;
- who the assurers are (including 'curriculum vitae' for lead third-party providers);
- the process by which conflicts of interest will be managed; and
- a requirement for actionable duty of care (that is a legal right of action) against an assurer in relation to certain matters.

We outline our assurance approach in Section 4 of this document.

² ofwat.gov.uk/publication/pr24-final-determinations-expenditure-allowances-assurance-requirements-for-delivery-of-enhancement-schemes-appendix/

3. Continuous stakeholder and customer engagement

3.1 Customer engagement

Our insight work allows us to have a deep understanding of what our customers want and helps us to drive improvements in what we deliver. In 2024–25 we engaged with over 50,000 customers over 10,000 hours, receiving direct feedback on our service and plans.

We analyse millions of data points including social listening, complaints, demographic data and externally produced reports.

Our Water Futures 2030 Panel representing household customers meets monthly to help share day-to-day insight (e.g., improving a blockages campaign or reviewing improved website pages) or more strategic work (e.g., our business plan or water resource planning). The group, managed by an independent research partner, provides feedback that over time has helped us develop clearer bill increase communications and informed changes to the process for customers to report a pollution incident.

We also use the insight from Water Futures 2030 with a Customer Committee. A diverse group of community leaders also review the feedback to make sure that views from harder-to-reach communities are represented. Our Customer and Communities Challenge Group, made up of experts, help us to review, challenge, and improve our plans.

Our Rivers and Seas Watch User Research Panel, primarily open water enthusiasts: from experts to casual sea dippers, help validate changes we make and uncover new user needs and behaviours. We also host a working group made up of recreational water leaders, environmental activists, and local councillors. Members receive feedback on and ask questions about upcoming changes to the service, including those called for by an independent expert review.

All these groups follow best practice guidance, as set out by the Consumer Council for Water (CCW), to provide a continuous dialogue on both our current delivery and future planning.

3.2 Stakeholder and regulator engagement

Drinking Water Inspectorate

There is a significant amount of information submitted to the DWI with respect to our assets, our drinking water data, and our water quality sampling. All annual data returns provided to the DWI, and the water quality sampling programme are subject to internal assurance.

We have a varied programme of activity helping to improve our information management systems and processes. This package of work started in 2020, and a programme of asset and IT improvements designed in cooperation with the DWI largely concluded in March 2025. The DWI agreed that the majority of the Section 19 Information Management Undertaking (IMU) programme was complete, however they have agreed revised dates for the outstanding elements of 'Manage Operational Boundaries' and the Operational Technologies Transformation Programme. The Operational Boundaries were completed in July 2025 and the water sites Operational Technologies Transformation Programme are now complete. A progress report on remaining actions of the S19 IMU is due by 31 March 2026, with a completion report due on 30 April 2026.

Environment Agency

We provide a significant amount of data to the Environment Agency about the performance of our assets, our abstraction and management of water and any wastewater or sewage discharges we make into rivers, streams and coastal waters. We are committed to transparent reporting of high-quality data that can be trusted by our customers, stakeholders and regulators.

Increased monitoring is essential to improve our wider environmental performance and to achieve a significant reduction in the use of storm overflows. We continue to invest in improvements to the timeliness and accuracy of our data. Event Duration Monitors (EDMs) remain an important part of monitoring the quality of our waters and providing accurate information on sewage discharges. We now have EDM coverage across 100% of our storm overflow outfalls, including inland outfalls. Our on-going programme of maintenance ensures that we can maintain at least 95% availability of these assets.

We have a mature programme of installation and active monitoring of maintenance in place to support this programme. Any EDM that has not reported for up to three days is automatically added to our maintenance schedule and is actively tracked to ensure completion of the task. In addition to this regular review of EDM availability, less reliable monitors are being phased out of the estate. This is allowing us to push our EDM availability to beyond 95% (we expect this to keep progressing through the year).

Following feedback from our working group, customers, and an independent review, we have been working hard to develop a new and improved version of Beachbuoy, called Rivers and Seas Watch, which was launched in June 2024. Our Rivers and Seas Watch tool provides near real-time information about storm release activity near coastal bathing waters through an interactive map, pop ups and release table. This 24/7 reporting provides information about any release and its frequency. Rivers and Seas Watch is a critical part of our dedication to transparency, and we regularly ask for feedback from our User Group which includes councils, campaign groups and bathing water users to ensure the best possible service.

4. Our approach to assurance in AMP8

4.1 Continuous improvement approach to assurance planning

At Southern Water we align our assurance to the ‘three lines of defence’ framework for our reporting governance and assurance activity. This helps to assure performance information by applying multiple levels of control. We are committed to driving continuous improvement to support the embedment of a modern, transparent, and ethical compliance framework under our Modern Compliance Framework. We continue to significantly strengthen our performance monitoring capability which underpins the completeness and accuracy of our performance data and provides more confidence in the information we publish.

We apply internal controls and have improved processes in place to mitigate the risk of supplying incorrect or inaccurate information on all our non-financial regulatory reporting. Ultimately, all assurance activity has oversight from the Audit Committee and Board.

The Audit Committee monitors the integrity of our non-financial information reported by the company in fulfilment of its regulatory, legal, and environmental obligations. This includes information required by Ofwat, the DWI and the EA. The assurance plans are approved by the Audit Committee, which is responsible for overseeing and challenging the effectiveness of our approach.

Our assurance strategy, and the resource and capability of the relevant teams have been reviewed and re-set to ensure that our assurance strategies are fit for purpose in AMP8. Our refreshed approach and revised structure enable us to better support our ambitious AMP8 plans, providing the business, our Board, and our regulators, confidence in the quality of the work being delivered in AMP8.

4.2 Approach to providing internal and third-party assurance

Ofwat expect companies to appoint their third party assurers in line with the expectations outlined in their PR24 guidance documents, and to make sure that the terms of appointment between companies and third-party assurers includes terms that provide Ofwat with an actionable duty of care (that is a legal right of action) against the assurer in relation to certain matters (in addition to any such duty that would be owed to the company by the assurer).

Our technical assurance framework agreement in place for our five-year Business Plan Period (AMP8) allows us to appoint the most suitable provider to different technical projects. Where external assurance support was required during AMP8 before the new framework agreement was in place, this was carried out using our existing AMP7 assurance framework; assurers were required to sign a ‘Letter of Reliance’ with Ofwat, in order to meet the requirements of Ofwat’s actionable duty of care.

In ‘PR24 final determinations: Expenditure allowances – assurance requirements for the delivery of enhancement schemes appendix’³, Ofwat specifies which elements are subject to third-party assurance. We will apply this guidance in our approach to providing third-party assurance.

For assurance outside of this we will apply a risk-based approach; in general, any high/critical risk reporting will also be subject to third-party assurance, and low/medium risk reporting subject to internal third line assurance.

4.3 Types of assurance and coverage

Whilst the assurance requirements for our different regulators are different, we have a standard approach to the way we prioritise and plan assurance across all our non-financial regulatory reporting across our main regulators:

- Ofwat;
- The Environment Agency (EA);
- The Drinking Water Inspectorate (DWI);
- The Consumer Council for Water (CCW).

The focus of our work is on the provision of risk based third-line assurance over information that is provided to our regulators and the end-to-end processes that support the collection and analysis of that information. The range of different activity that could be undertaken means that each potential area of work will be risk assessed to ensure that work is focused on areas of highest risk. The different types of assurance that we undertake include:

Assurance over data reported to Regulators

- Assurance over monthly/quarterly/annual/event-based information provided to regulators;
- Mandatory requirement (Ofwat);
- Best practice and risk-based approach for assurance over reporting to other regulators; and
- Risk-based approach to whether assurance provision is internal or external unless otherwise prescribed.

Assurance over Regulatory Action Plans

- Specific assurance activity (internal and external) over action plans that have been agreed with Regulators; and
- Activity can be driven from business plans and regulatory enforcement undertakings.

³ofwat.gov.uk/publication/pr24-final-determinations-expenditure-allowances-assurance-requirements-for-delivery-of-enhancement-schemes-appendix/

4. Our approach to assurance in AMP8 continued

Themed Reviews

- Audits of specific areas of high risk and non-financial regulatory issues; and
- Derived from analysis of areas of risk and weakness and our on-going stakeholder engagement.

4.4 Our third-party assurers

The procurement activity to appoint our technical assurance framework agreement for our five-year Business Plan Period (AMP8) concluded in November 2025 and we are pleased to confirm the following assurers have been appointed to the framework:

Table One – AMP8 Assurers

Lot ref	Assurer Name
Lot A – Regulatory Assurance	1) Aqua Consultants
	2) Jacobs UK Limited
	3) Turner & Townsend Project Management & Nera
	4) Stantec UK
Lot B – Internal Audit & Fraud investigations	1) J.S. Held UK
	2) BDO LLP

Ofwat expect all independent third-party assurance providers to be suitably qualified and independent in the relevant field. Assurance providers will have a named lead assurer with appropriate experience and qualifications to be able to approve all assurance reports. The lead assurer will be a senior individual (equivalent to Senior Director or Partner level) with appropriate experience and qualifications. They will be:

- Responsible for overall assurance sign-off;
- Instructed to provide an objective, unbiased opinion on matters within their expertise and to consider all material facts, including those which might detract from Southern Water’s opinion;
- Required to provide a specific statement that they understand that they are appointed, at Southern Water’s cost, to accurately assess and assure our performance, possess sufficient experience to do so, and have a duty to help Ofwat in that regard; and
- Required to provide their ‘curriculum vitae’ in an appendix to their overall assurance reports.

4.5 Managing conflicts of interest

During the procurement exercise to appoint assurers to our AMP8 technical assurance framework agreement, we investigated any actual, potential or perceived conflicts of interest with the third-party assurers. Any potential conflicts identified require the third-party assurers to set out mitigations they have in place; their processes to manage these were assessed prior to appointment on our framework agreement.

Ofwat have set out specific requirements regarding conflicts of interest in their PR24 Final Determination guidance. Prior to a new engagement for third-party assurance commencing, we will again investigate any actual, potential or perceived conflicts of interest with the assurance provider, including the individuals to undertake the work as well as the company. Third-party assurers are required to sign a ‘No Conflict-of-Interest Declaration’, prior to the commencement of assurance activity. If a third-party assurer is unable to sign a ‘No Conflict-of-Interest Declaration’, we will seek an alternative assurer from our framework agreement.

5. Final Assurance Plan for 2025–30

In Table Two we outline the main elements of our Assurance Plan for 2025–30. Our assurance plan is set out in line with our ‘three lines of defence’ framework of assurance and is also a response to the key risks and areas of weakness highlighted

as an output of our Assurance Strategy and Draft Assurance Plan, as well as taking on views from our ongoing engagement with regulators, our external assurers and customers. The vast majority of the activity within the Assurance Plan is prescribed by our regulators.

Table Two – Final Assurance Plan 2025–30

Alignment to Principal Risks	Risk area	Why?	The assurance we will be doing	Established/new
Compliance, Corporate Affairs AND Delivery	Ofwat Annual Performance Report (APR), including Performance Commitments and Outcome Delivery Incentives (ODIs); Cost Assessment Tables	<p>We believe customers should be able to trust our reporting of all our non-financial performance information.</p> <p>Independent external technical assurance providers complete reviews of our regulatory compliance reporting processes and associated data, as well as reporting to our board, Executive Committee and the Audit Committee. This information is published in our Annual Performance Report.</p>	<p>Year-end non-financial assurance – external assurance and internal assurance.</p> <p>A risk assessment will be completed of all the reporting processes to determine whether assurance will be internally or externally provided.</p> <p>Testing of the high and critical risk data lines for performance commitments and the cost assessment tables will be performed by an independent assurance provider. The independent assurance provider will identify its own approach to conducting audits including its own risk assessment and testing methodologies to deliver its conclusions.</p> <p>Low risk testing will be undertaken in-house.</p> <p>As we develop our approach to regulatory reporting the emphasis will move towards the level of maturity of our control environment.</p>	<p>Established approach for assuring end of year Ofwat APR information provided.</p> <p>This will continue for the remainder of the current business plan period.</p>
	Mid-year assurance	<p>AMP8 will introduce new reporting measures that have not previously been reported, or that include changes to the methodology since AMP7.</p>	<p>We will undertake detailed end to end process assurance over the risks and controls associated with the production of these new measures.</p>	<p>Established approach which will continue taking account of any evolving regulatory requirements.</p>
	Annual Report and Accounts, including financial APR data	<p>We have a statutory obligation to ensure that our financial accounts are robust, accurate and complete.</p> <p>Our Annual Report is the primary way we publish our annual performance information, and it is made publicly available to all stakeholders. The annual report includes our statutory accounts and our performance over the year and how this compares against our performance commitments as well as broader information on our commitments and responsibilities to stakeholders and customers.</p>	<p>Methodology and data are subject to three lines of assurance with our financial auditor, performing third line assurance in accordance with the appropriate accounting standards.</p> <p>Our financial auditors will carry out assurance of reported performance data and presentation of information and risks.</p>	<p>Established approach which will continue taking account of any evolving regulatory requirements.</p>
	Business Plan 2030–35 (PR29) assurance	<p>A PR29 assurance workstream will be defined as we start to develop our business plan for the next five years (PR29).</p>	<p>We will engage with the PR29 workstream to understand any assurance requirements specifically for the Price Review. This will include assurance activity from 2027 through to 2029 and be implemented in accordance with our business-as-usual approach to assurance to ensure good practice. This will include strategic assurance of the whole plan in addition to technical assurance of specific workstreams, consistent with DWMP, WRMP and WINEP requirements.</p>	<p>Established approach which will continue taking account of any evolving regulatory requirements.</p>

5. Final Assurance Plan for 2025–30 continued

Table Two – Final Assurance Plan 2025–30

Alignment to Principal Risks	Risk area	Why?	The assurance we will be doing	Established/new
Compliance, Corporate Affairs AND Delivery	Asset management maturity assessment 2026 (AMMA)	Building on the 2021 Asset Management Maturity Assessment (AMMA) vision, AMMA 2026 strengthens the frameworks that help companies assess and improve asset management capability in the sector. This includes gaining a better understanding of how companies have improved their asset management capabilities so they can anticipate and manage service risks from longterm pressures such as asset health deterioration, climate change and population growth.	Ofwat requires us to provide internal assurance of AMMA 2026 and a description of our internal assurance framework (upon request). We are required to provide evidence confirming our current asset management maturity and capability and explain material changes since the 2021 assessment. Our submission will include an estimate of future maturity, both at the end of 2025–30 (AMP8) and 2031–35 (AMP9) with improvement plans describing how future maturity will be achieved. Our first self-assessment is due by 31 March 2026. Ofwat will assess submissions and provide feedback in Summer 2026. We are then required to submit a final assessment by 11 September 2026 which will contribute to Ofwat's "Insight and Recommendation Report" in January 2027.	New requirement from 2026.
	PR24 Cost Change process and data requests for Asset Health	In Ofwat's final determination, they set out their intentions to enhance asset health understanding in the water sector during the 2025–30 period. As part of this, Ofwat stated that they would consider whether additional allowances were required during the 2025–30 period to make further improvements to asset health for a defined set of priority assets. This investment would be above and beyond that already funded through PR24 base expenditure allowances. Ofwat may also ask us to respond to data requests in relation to our asset health. This forms part of their enhancing asset health understanding roadmap.	Ofwat expects independent third-party assurance on all PR25 Cost Change submissions to be provided. Assurance of the proposed investment should be consistent with the assurance requirements set out in their document 'PR24 Cost Change process Asset health investment guidance'. Where Ofwat specify that external assurance is required, we will procure this through an appropriate third party.	New requirement from 2026.

5. Final Assurance Plan for 2025–30 continued

Table Two – Final Assurance Plan 2025–30 continued

Alignment to Principal Risks	Risk area	Why?	The assurance we will be doing	Established/new
Delivery	Delivery Plan, Delivery Action Plan and Delivery Plan progress report for 2025–30 assurance	<p>Our Delivery Plan will set out the milestones for the completion of our capital delivery programmes and our PCD output targets for 2020–25. Our Delivery Action Plan will set out the actions we propose to expand our delivery capacity.</p> <p>Both plans are subject to monitoring through the Delivery Plan progress report.</p>	<p>Ofwat require us to publish assured versions of our Delivery Plan and Delivery Action Plan on our website in line with publication of our Annual Performance Report in July. We are also required to report progress against both plans to Ofwat, at least every six months and up to three months.</p> <p>Where Ofwat specify that external assurance is required, we will procure this through an appropriate third party. Where the information falls outside of this, we will undertake second line assurance.</p>	New requirement for 2025–30.
	PCD Assurance reports	<p>Ofwat require an overall PCD assurance report to be provided alongside each delivery plan progress report in July of each year over the 2026–30 period. Individual PCD assurance reports should also be provided alongside the overall PCD assurance report in July of 2028, 2029 and 2030.</p>	<p>An independent assurance provider will provide an overall PCD assurance report with a risk assessment (in the form of a RAG rating) of our overall performance against all PCDs and against each individual PCD.</p> <p>Ofwat expect the assurance provider to prepare individual PCD assurance reports to support the overall PCD assurance report. Individual PCD assurance reports should also be made available to Ofwat on request.</p>	New requirement from 2026.
	Direct procurement for customers (DPC) projects	<p>Direct procurement for customers (DPC) improves value for money by increasing competition in the delivery of large infrastructure projects.</p> <p>Projects which are delivered by competitive tendering (DPC or Specified Infrastructure Projects Regulations (SIPR) must go through a process entailing four Ofwat approval stages.</p>	<p>Ofwat’s consent is required before we can put a DPC project out to tender or enter into a CAP Agreement. There are four approval stages:</p> <ul style="list-style-type: none"> • Stage 1: Establishing the Strategic Case; • Stage 2: Approach to procurement plans, outline of the commercial model and designation of the project; • Stage 3: Gaining consent to procure the project; and • Stage 4: Gaining consent to enter into a CAP Agreement. <p>We will appoint external technical assurers to support our submissions to Ofwat.</p>	New requirement for 2025–30.
	Large Gated Schemes and RAPID projects	<p>Very large capital delivery schemes will require regulatory approval at defined milestones or “gates” and will be externally assured at each gate.</p> <p>Ofwat requires external assurance over schemes at each gate, and we will not be able to proceed to the next gate until assurance has been undertaken.</p> <p>There are also a small number of major projects that are Rapid Projects but are not eligible for delivery through either the DPC or SIPR competitive tendering models and will be delivered in-house using our own procurement processes (but will still have RAPID oversight).</p>	<p>Technical assurance will assess our schemes from an engineering and investment perspective.</p> <p>Commercial assurance will assess the cost estimation element by looking at efficiency of our schemes and changes to costs since the business plan was published.</p> <p>If assurers cannot agree our costs, an anomaly and exclusion report will be issued to us and Ofwat by assurers.</p> <p>Projects with RAPID oversight need to go through four RAPID gates in addition to the Ofwat stages.</p>	New requirement for 2025–30.
	Business Continuity Management	<p>Business Continuity and Functional Continuity Plans are in place to support the company’s capacity to work effectively in the event of a significant power outage. A recent review highlighted a gap in regular testing and need for refreshment of some plans.</p>	<p>The Business Continuity Management Oversight Committee provides quarterly reviews ensuring ongoing assessment and maintaining resilience to such events.</p> <p>Internal assurance will also be completed on Business Continuity and Functional Continuity plans to ensure evidence of contingencies in place to adequately cover such a scenario,</p>	New requirement for 2025–30.

5. Final Assurance Plan for 2025–30 continued

Table Two – Final Assurance Plan 2025–30 continued

Alignment to Principal Risks	Risk area	Why?	The assurance we will be doing	Established/new
Digital and Water	Security of Network and Information Systems (NIS) and Cyber Security assurance	The Security of Network & Information System Regulations provide legal measures to boost the level of security (both cyber and physical resilience) of network and information services for the provision of essential services and digital services.	We will ensure appropriate external assurance is completed over the NIS annual return.	Established approach.
Compliance	Ofwat Undertakings	In February 2026 Ofwat agreed to a set of new S19 Undertakings in relation to our management of flow compliance in our wastewater operations. This was the outcome of the sector wide Ofwat investigation into flow compliance. As a result, Southern Water had committed to implement a range of financial and non-financial measures ('Undertakings'). The undertakings support Ofwat's focus on wider industry priorities to improve our compliance with S94 of the Water Industry Act 1991, and the Urban Waste Water Treatment (England and Wales) Regulations 1994.	As part of the new undertakings we are required to submit a detailed action plan in August 2026. As part of this action plan, a programme of independent third party assurance will be proposed, and will likely involve reporting back to Ofwat on a six monthly basis. The focus of the assurance will be to ensure that any issues identified have been stopped and cannot be repeated.	New requirement for 2025–30.
	Reporting to the DWI and DWI Information Management Undertaking	We provide a significant amount of information to the DWI with respect to our assets, our drinking water data, and our water quality sampling. A progress report on our remaining S19 information Management Undertaking (IMU) actions is due on 31 March 2026 and a report confirming completion of our remaining S19 IMU actions is due on 30 April 2026.	All annual data returns provided to the DWI, and the water quality sampling programme, will be subject to first line control and will also be the subject of second line assurance. Second line assurance is undertaken biannually to confirm and track the implementation of the agreed actions included in the Information Management Undertaking.	Established approach.
	Annual Report to CCW	CCW is the statutory customer representative body for the water industry. We want to ensure that the information provided to them on a quarterly and annual basis is accurate.	Much of the information provided in the returns comes from our Ofwat Performance Commitments – this data is assured under our Annual Performance Report assurance processes (see above). Where the information falls outside of this, we will undertake second line assurance.	Established approach.
	Carbon Accounting Workbook	An Ofwat requirement aligned to the APR submission, this detailed tool calculates our greenhouse gas emissions and other carbon data.	We will engage an external assurer to complete technical assurance of our Carbon Accounting Workbook. This will be carried out as part of our APR year-end process.	Established approach.
	ESG reporting – Sustainable Bonds	Sustainable Investment Bonds – as a result of raising over £1bn of sustainable bonds, one of the mandatory requirements is to report to our investors on an annual basis and provide them a report annually on the impact their investment has had on our ESG (environmental, social and governance) credentials, this is known as an 'impact report'.	The first report for Southern took place in the 2020-21 reporting period by external assurers. External assurance to take place annually.	Established approach.
	Ofwat Operating licence	We have a wide range of obligations to meet as part of our Ofwat licence to operate. We want to ensure that we can demonstrate that our activities as a business align to these requirements.	Internal assurance will be undertaken as part of an annual review of our Ofwat Operating Licence. The review will also support our Condition P annual assurance as part of the publication of our Annual Performance Report.	Established approach.

5. Final Assurance Plan for 2025–30 continued

Table Two – Final Assurance Plan 2025–30 continued

Alignment to Principal Risks	Risk area	Why?	The assurance we will be doing	Established/new
Wastewater and compliance	Reporting to the EA	<p>We provide a significant amount of data to the Environment Agency about the performance of our assets, our abstraction and management of water and any wastewater or sewage discharges we make into rivers, streams and coastal waters.</p> <p>Historic and ongoing investigations into the company from the EA means that we are under significant scrutiny over the information we provide.</p>	<p>The EA have been consulting on upcoming methodology and reporting changes that will come into effect during AMP8. Shadow assessments are ongoing for some of the Environmental Performance Assessment (EPA) metrics that are still being developed, with the intention of going live in the period 2026–30.</p> <p>Regulatory reports provided to the EA will be subject to first line controls.</p> <p>Areas of reporting that have been analysed as higher risk will be subject to second line assurance.</p>	Established approach which will continue taking account of any evolving regulatory requirements.
	Pollution Incident Reduction Plan	Our Pollution Incident Reduction Plan is updated annually and sets out how we will achieve a reduction in pollution incidents. This is also crucial to our work to improve our rating in the Environmental Performance Assessment.	We will undertake annual internal assurance over our Pollution Incident Reduction Plan to assess effectiveness of the current plan against meeting our targets.	Established approach.
	Delivery Monitoring Framework (DMF)	The Environment Agency, Ofwat, Natural England, and Defra have jointly developed a DMF to provide clarity and consistency of the reporting of the WINEP. The framework sets out how Southern Water should track the progress and delivery of WINEP schemes during AMP8 (2025–30) and links to our PCD reporting.	<p>We report completion of our WINEP actions to the EA. Prior to claiming an output, we need to prepare an action completion report with supporting evidence pack which has been assured by our own assurance process.</p> <p>As this is a novel approach to WINEP oversight, the second line assurance team will work with the first and second line teams to understand existing processes and governance around scheme completion reports and evidence packs, ensuring they are compliant with regulatory requirements, and to recommend improvements where appropriate.</p>	New approach for 2025–30.
	Drainage and Wastewater Management Plan (DWMP)	We are producing our second DWMP following the approach developed by Water UK, which will establish our long-term approach to improving and maintaining a robust and resilient drainage and wastewater system over the next 25 years and more.	<p>Defra have confirmed the below statutory milestones:</p> <ul style="list-style-type: none"> • The draft DWMP is required by 1 November 2027 (including a 12-week consultation period) • The final DWMP is due by 31 August 2028. <p>Independent external assurance will be undertaken on the plan as required, ahead of the statutory milestones.</p>	Established approach, expected to continue until 2028.

5. Final Assurance Plan for 2025–30 continued

Table Two – Final Assurance Plan 2025–30 continued

Alignment to Principal Risks	Risk area	Why?	The assurance we will be doing	Established/new
Water	Western Area Strategic Solution (Water for Life – Hampshire)	We have committed to working with other water companies to address our water resource issues and have several proposed solutions in scope for development. The work is being overseen by RAPID (Regulators’ Alliance for Progressing Infrastructure Development) comprising representatives from Ofwat, EA and DWI. The funding agreement with Ofwat for 2020–25 states we are required to obtain “external assurance of data and approaches supported by Board statement”.	Assurance has continued ahead of reporting milestones to RAPID. The second line assurance team will continue to provide support to the programme to ensure we meet RAPID’s requirements, and that activity aligns with the PR24 business plan and WRMP24.	Established approach, expected to continue in line with RAPID milestones.
	Drought Plan	We’re required to update our Drought Plan every five years as per the Water Industry Act. Work has already commenced to develop our Drought Plan 2027.	This process will require assurance of the final plan and the Statement of Response as well as of the revised draft plan if one is produced. The timing of all of these is dependent on the timetable confirmed by Defra.	Established approach which will continue taking account of any evolving regulatory requirements.
	Water Resources Management Plan 2024 (WRMP24) AND Water Resources Management Plan 2029 (WRMP29)	Our Water Resources Management Plan (WRMP) published every 5 years, forecasts how much water we’ll need in the future and proposes a mix of options to make sure we can meet demand.	Technical and legal assurance over the methodology and content of the plan and the data tables. We submitted our final draft WRMP24 to Defra in May 2025; once approved, we will publish the plan. If Defra recommends material changes to the plan, assurance will need to be repeated to allow the Board to approve publication. We will follow the same approach for WRMP29. We are also required to provide an annual update to the EA on our WRMP. Second line assurance will be undertaken to review consistency and accuracy of data reported.	Established approach.
Customer	GSS missed appointments payments	Changes to the Guaranteed Standards of Service came into force from October 2025.	Second line assurance on compliance with revised GSS requirements.	Change in requirements from 2025.

Appendix 1 – Changes from the Draft Assurance Plan

Alignment to Principal Risks	Risk area	What we said we would do in the draft plan	Change	Rationale
Compliance, Corporate Affairs AND Delivery	Asset management maturity assessment 2026 (AMMA)	Omitted from draft plan.	Added assurance details.	New requirement from 2026.
	PR24 Cost Change process and data requests for Asset Health	Omitted from draft plan.	Added assurance details.	New requirement from 2026.
Compliance	Ofwat Undertakings	Any future undertakings will be subject to assurance.	Added assurance details for the new S19 Undertakings in relation to our management of flow compliance in our wastewater operations.	New undertakings agreed with Ofwat in February 2026.



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