

Sent by email to:

Alice Gradwell, Senior Case Officer
Information Commissioner's Office

Dear Ms Gradwell,

Your reference: FPR0987680

I am pleased to have this opportunity to provide you with our response to your Practice Recommendation FPR0987680 14102024, issued to us on 14th October 2024.

Since I became CEO, I have been very clear about the importance of engagement with the customers and communities we serve across the North West. This includes a commitment to openness, transparency and the timely provision of environmental information, driven by a cultural shift within my senior leadership team in how we approach the Environmental Information Regulations (EIR).

In the six months leading up to December 2024, we have experienced a 40% increase in the volume of EIR requests received. Despite this significant rise in demand, we have achieved a 15% improvement in our compliance with statutory timescales, culminating in 100% compliance in the final quarter of the year. Additionally, we have seen a 31% increase in the number of responses that provided the requested information in full and a 32% improvement in the volume of open requests managed with permitted extensions. The improvements outlined in our response have been instrumental in driving this step change in both transparency and performance, ensuring that we continue to meet our obligations while enhancing the efficiency and effectiveness of our response process.

I recognise the importance of public confidence and trust in United Utilities, and I do not take it for granted. I recognise that ensuring that providing the public with access to accurate and timely environmental information is essential to maintaining that trust, and I take our responsibilities under the EIR very seriously. I want to reiterate my continued commitment to implement improvements to ensure stakeholders, customers and our communities have access to our environmental information, to develop a more comprehensive understanding of our environmental performance.

I very much welcome the guidance and clarity provided by the Recommendation and I can report significant progress in all areas, building on work that was already underway to improve our processes for managing EIR requests. Not only have we addressed each recommendation, but our dedicated team has also identified opportunities to go further.

The appendix to this letter provides a summary of the actions taken in response to the ICO's recommendations and we remain committed to reviewing the efficacy of these – and the potential for any further improvements – in the future.

Yours sincerely,

A handwritten signature in black ink, reading "L. I. Beardmore". The signature is written in a cursive style with a large initial "L" and "I".

Louise Beardmore
Chief Executive Officer
United Utilities Water Limited

1. Part I/IV – Training / Timeliness in dealing with requests for information

The recommendation:

The ICO advised that we fully consider the broader context of requests received and the definition of environmental information under the relevant regulations. The ICO made clear that our starting position should be to assess each request with a presumption that the information requested is environmental and with that, dealt with under EIR which comes with a presumption in favour of disclosure, aligning with the principles of openness and transparency.

Action taken:

- The cases referenced in the practice recommendation were from earlier last year. Since then, we have created a dedicated team of specialists who have undergone extensive training on the Environmental Information Regulations. This team now serves as custodians of the end-to-end process for managing EIRs, ensuring compliance and consistency in our approach.
- It should be noted that, having received clarification from the ICO at points throughout the year regarding our assessment of environmental information, and since creating our new team, we have not had any further issues raised with or by the ICO relating to our assessment of whether information requested is environmental. Additionally, by April this year we will have delivered role-specific training as part of a structured training plan. This will be delivered to colleagues across the broader organisation who contribute to the response process, whether through data collection or technical expertise. This will seek to secure that there is much greater awareness, from the full range of people involved, of the obligations under EIR and that they will be better equipped to meet them effectively.
- A key improvement made last year has been the implementation of a new workflow management system. This system allows us to monitor each request's progress in real time, ensuring that all relevant stakeholders across the organisation are engaged promptly and that deadlines are met. By streamlining our processes and improving oversight, this system has strengthened our ability to comply with statutory timescales, contributing to our marked improvement in our overall performance.
- Additionally, we have introduced a new 'information inventory' tool, which services as a central resource for the team when assessing new requests. Given the often broad and complex nature of EIR requests, this inventory enables us to quickly identify the most relevant areas of the business to provide the required information or data. By facilitating a more targeted and efficient approach to information gathering, this has also helped to reduce response times and improve compliance.

2. Part II - Proactive dissemination of information (Proactive publication)

The recommendation:

The ICO emphasised the importance of proactive dissemination of data, in particular referencing publication of data relating to storm overflow spill start and stop times, on a monthly basis.

Action Taken:

- We began publishing our monthly storm overflow spill start and stop time data in January 2025 and will continue to do so ([Storm overflow performance | United Utilities](#)). This regular publication reflects our commitment to transparency and ensures that key stakeholders and the public have access to up-to-date information.
- To further improve accessibility and the relevance of published data, we are actively engaging with external key stakeholders to understand what additional information they would find valuable. This includes working collaboratively to identify opportunities to enhance the visibility of important data related to our wastewater performance and water quality. By incorporating this feedback, we aim to make our published information more meaningful, user-friendly, and accessible.

3. Part II - Proactive dissemination of information (Disclosure log)

The recommendation:

The ICO advised that we should implement a disclosure log to improve transparency and reduce individual requests for information by publishing responses to previous EIR requests.

Action taken:

- We are pleased to have introduced a new EIR disclosure log, which can be accessed via our website at [Environmental Information Disclosure Log | United Utilities - Corporate](#). We recognise that providing visibility of our responses is an important step in aligning with our commitment to transparency.
- We also publish the datasets sent alongside these responses. By proactively sharing more information, we aim to reduce the need for the public to make repeated requests.

4. Other matters - Publication of EIR compliance statistics

The recommendation:

The ICO advised that we begin publishing our compliance statistics in accordance with the Commissioner's guidance on reporting performance on handling requests.

Action taken:

- We are happy to confirm that, as of November 2024, we have begun publishing our EIR compliance statistics on our website ([Environmental Information | United Utilities - Corporate](#)). This step further reflects our commitment to transparency and aligns with the Commissioner's guidance on reporting performance on handling requests, providing greater visibility into our responsiveness and compliance.

We acknowledge the other recommendations made in this section, specifically the publication of previous responses and the proactive publication of performance information, and we have outlined the actions taken to address these points in Sections 2 and 3 above.

In addition to implementing the recommendations set out by the Information Commissioner, we would like to take the opportunity to share with you other important improvements we've made to enhance how we manage EIR requests.

Website navigation and submitting requests

- We've been improving accessibility to the EIR section of our website ([Environmental Information | United Utilities - Corporate](#)). We have reviewed our tagging logic, which is a system that assigns and interprets keywords to improve search accuracy and relevance. This means that when members of the public search for 'Environmental Information' or 'EIR' – whether through external search engines or the United Utilities website – the link to the EIR webpage should appear as the top result.
- To further improve visibility, we have also included 'Environmental Information' in the main menu of our corporate website. Additionally, we have introduced a new form on the EIR webpage, allowing requestors to submit their requests online rather than via email or letter ([Request environmental information | United Utilities](#)). This new feature is designed to simplify and streamline the process, making it easier for individuals to access and request environmental information.

Obtaining requestor feedback

- We have recently introduced a new feedback mechanism in the form of a short survey, which is included as a link in our email response. This is not intended to replace or detract from the formal EIR process. Requestors will still be informed of their right to request an internal review or raise a complaint with the ICO if they are unhappy with how we handled their request. Instead, the survey gives requestors the opportunity to share their experience of navigating our

website, submitting a request and receiving a response. We welcome feedback from users on aspects such as the clarity of the information provided and the time taken to respond, as this will help us to identify how we can further enhance the requestor experience, based on their feedback.

Continued focus on Windermere

- We recognise the importance of transparency and the desire for access to more data for the Windermere area, and we are committed to being more proactive in sharing and publishing relevant information for the local community. To achieve this, we are collaborating with local stakeholders to better understand what information they would like to see made available on our website. This will help us develop a dedicated section that is easily accessible to the public, providing them with access to relevant information.
- Additionally, we are working closely with our technical teams to support publication of our data in an open format. This will allow for greater transparency, ease of use, and enhance the scope for others to analyse the data.

In closing, we acknowledge the ICO's recommendations and appreciate the clarity that has been provided. We have worked hard to implement a number of improvements, as outlined above and we are committed to doing what we can to support transparency and ensuring our data is accessible to the public. We will continue to review and refine our processes in the future to support a positive experience for requestors when they seek environmental information from us.