March 2015 Trust in water

Service incentive mechanism – guidance for collating customer service information for calculating the SIM score



About this document

This document sets out guidance for companies on how to collect customer contact information for the purposes of calculating the annual service incentive mechanism (SIM) score.

This guidance applies from 1 April 2015. It updates previous guidance to reflect changes to the approach for the SIM as set out our consultation response document.

The common approach set out in this guidance helps us and the sector to deliver trust and confidence in the customer service performance information companies may publish.

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1. Overview of the SIM and outline calculation

1.1 What is the SIM?

The service incentive mechanism (SIM) is an incentive mechanism designed to encourage water companies in England and Wales to provide better customer service. It also allows comparison of company performance. It measures the following aspects of service delivery.

- Where customers have made contact when something has gone wrong or appears to have gone wrong – for example, phoning about a billing error or writing to complain about a water supply problem.
- A customer survey measures how well companies have handled all types of customer contacts, not just when things have gone wrong.

With the expected opening of the retail market in April 2017, we have updated the SIM measures to focus on contacts from (mainly household) customers who will remain unable to choose their water and wastewater service provider.

Although the legislative change is not yet in effect, the update to the SIM guidance is effective now, such that non-household contacts may be excluded from statistics as described in this document. We tested the guidance changes during 2014-15 ready for full implementation from April 2015.

Retail market opening will not apply in Wales. However, for ease and fairness of comparison, the SIM measure for households in Wales is the same as for those in England. A separate measure will continue to provide the service incentive for the non-households supplied by companies wholly or mainly in Wales.

Table 1 summarises:

- the measures set out in this document;
- how they apply; and
- the type of incentive associated with each measure.

Table 1 Summary of SIM measures

Customers served	Quantitative measures	Qualitative measures	Incentive
Households in England and Wales (served by the 18 largest companies)	'Unwanted' phone contacts, written complaints, escalations and CCWater investigations (25% of SIM total)	Survey of customers who have been in contact with their company (75% of SIM total)	Financial and reputational – comparison to other companies' household service
Non-households in Wales (served by Dee Valley and Dŵr Cymru)	Written complaints, escalations and CCWater investigations	Company choice – for example, Dŵr Cymru's non- household customer satisfaction measure	Financial and reputational – comparison to other companies' non-household service (and any company chosen outcome delivery incentive)
Non-households (served by largest 16 companies in England)	Written complaints, escalations and CCWater investigations	Company choice	Reputational comparison through CCWater complaints reporting (and any company choice)

1.2 Components of the SIM score (household customers in England and Wales)

Each year, a score out of 100 (higher is better) is calculated, which is made up of the following two elements.

Quantitative score (out of 25) based on the number of written complaints
and unwanted phone contacts a company receives. The companies classify
phone contacts as 'wanted' or 'unwanted' depending on the reason for the
customer's call. Also, any repeat contacts and calls expressing dissatisfaction
are counted as unwanted regardless of the reason for calling. Written
complaints are weighted according to the stage of the resolution process. The
initial complaint letter or email to a company has a low weight, while the

Consumer Council for Water (CCWater) investigating a written complaint carries a heavier weight. This takes account of whether the company resolved the customer's issue at the first contact.

Qualitative score (out of 75) derived from the customer experience survey.
 This is a survey of customers who have had direct contact with their company – for example, those who request a service, have a query or make a complaint. The survey asks customers how satisfied they were with the way the supplier handled their billing or operational issue. Operational issues include contacts such as a customer reporting poor water pressure or sewer flooding at their property. This measure reflects how satisfied customers are with the quality of service they receive from their company – both for dealing with complaints and for more routine matters such as making payments or asking for a water meter to be fitted.

The contacts included will in the main be from households in connection with their bill or an operational matter associated with their household premises. Contacts about operational matters that are not necessarily associated with household premises, such as defective manhole covers, leaking pipes or road works are also included. Company website contacts are included where the customer uses a web form (for example, to make a complaint, request a water meter or set up a Direct Debit) and web-based methods of bill payment (that is, paying their bill through a water company website). Simply browsing the company website for information would not be included.

The SIM does not capture the views of those customers who do not contact their supplier. Nor does it include forms of communication such as social networking sites or blogs where these are anonymous.

Provided they can be identified robustly as such, non-household customers eligible to switch supplier are excluded from the SIM statistics. This is regardless of whether they have switched or not.

To allow a fair household SIM comparison, the companies operating wholly or mainly in Wales may exclude non-households on the same basis as the English companies. (See also chapter 6.)

Figure 1 (on page 6) shows the various components and how they are combined to calculate the SIM score. This document provides guidance for each of these components.

1.3 Calculating the SIM score

1.3.1 Contact score calculation

All contacts from households as set out elsewhere in this guidance.

[(unwanted phone contacts x 1) + (written complaints x 5) + (escalated written complaints x 100) + (CCWater investigated complaints x 1000)] / (connected household properties /1000)

1.3.2 Quantitative component calculation

$$[1 - [(C - CL)/(CH - CL)]] \times WC$$

where:

C = total contact score (see above).

CL = contact score minimum (set at 0).

CH = contact score maximum (set at 500).

WC = contact score weighting (set at 25).

1.3.3 Qualitative component calculation

$$[(S-LS)/(HS-LS)] \times WS$$

where:

S = qualitative survey annual average score.

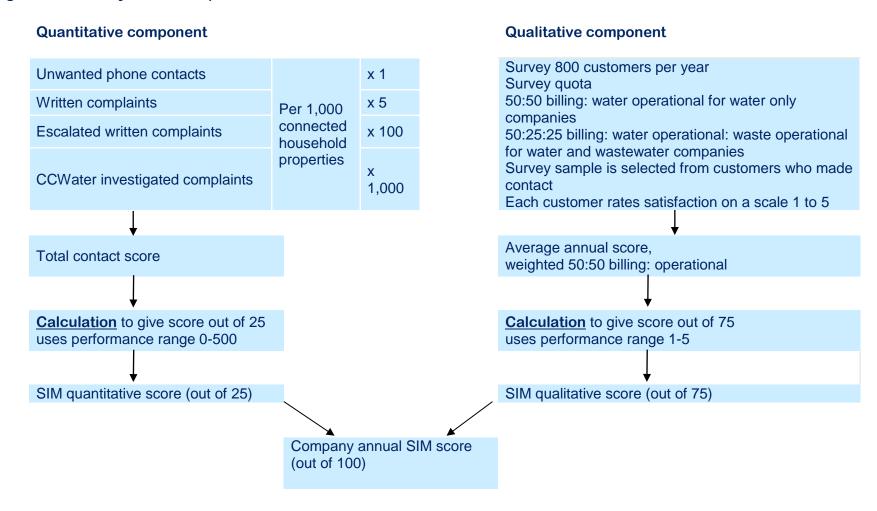
LS = minimum survey score possible (set at 1).

HS = maximum survey score possible (set at 5).

WS = survey weighting (set at 75).

A spreadsheet containing this calculation is available on our website.

Figure 1 Summary of SIM components and outline calculation



1.4 Definitions applicable to all SIM components

- Customers. We define 'customers' as any household user of water and
 wastewater services, including account holders. To ensure all contacts are
 captured, it also includes representatives, such as the Consumer Council for
 Water (CCWater), Citizens Advice or solicitors, where they are acting on a
 customer's behalf. It also includes contacts from people (including local
 authority staff) who may not directly be customers and make contact about
 services for example, to report a defective manhole cover or a leaking pipe.
- Households. Currently the definition of households/non-households is consistent with the definition used for company's 2015-20 business plans¹. During 2015-20 the intention is to periodically update the definition so it remains consistent with the definition for 'eligibility to switch'². Essentially, the SIM includes all those who are not eligible to switch.
- Developer services. This service mostly interfaces with builders, plumbers and property developers (that is, commercial entities). It is not a typical point of contact for household customers. Therefore, contacts that are dealt with by developer services are not included in the SIM. This includes where companies have separate specific contact channels used solely for developer services, or where a customer service operator or agent transfers customers to developer services.

http://www.ofwat.gov.uk/pricereview/pr14/retail/pap_pos20140319pr14costalloc.pdf

¹ See section 4.2 of

² Work is ongoing to refine the guidance on which customers will be eligible to switch suppliers. We published a consultation on our eligibility guidance on 9 March. See http://www.ofwat.gov.uk/competition/review/pap_con20150309eligibility.pdf

2. Unwanted phone contacts

2.1 Definition

 Unwanted phone contacts. This is the number of phone contacts received from customers that are 'unwanted' from the customer's point of view. This includes a contact about an event or action that has caused the customer unnecessary aggravation (however mild). It also includes repeat or chase calls by the customer to the company. This is determined by the subject matter of the call.

2.2 Aim

To measure the number of phone contacts to the company that, from the customer's perspective, are the result of a service failure by the company. Companies receive different sorts of phone contact. Some of these can be defined as 'wanted' from the customer's point of view – for example, when the caller wants to pay their bill, or is providing or seeking information. Others can be defined as 'unwanted'. These are where the caller has experienced some form of aggravation (however mild) and this has prompted them to make contact – for example, to report a service failure (low pressure orflooding) or to chase up where the company has not done what it previously said it would within promised timescales, or to complain. The customer does not want to make this call and it results in "failure demand" on the company so it is 'unwanted'.

2.3 Guidance

2.3.1 All calls to all lines

This covers **all** customer calls to **all** lines (including operational lines) into the company 24 hours a day, 7 days a week, regardless of whether the line is a principal advertised contact point or whether the call was taken outside office hours, including:

- calls to automated systems;
- switchboards:
- debt collection agencies;
- where the customer has been provided with a number and they make direct contact with back offices;

- company works and depots and contractors (such as contact with a local depot/contractor during operational work); and
- calls dealt with by automatic transactions/interactive voice recognition systems and recorded messages (such as message manager).

Provided that they can identify them robustly, the companies may exclude:

- non-customer calls for example, calls from contractors and suppliers;
- calls made by a company's field operatives to company offices;
- wrong numbers, including calls where a customer is referred to another company (that is, where the customer has contacted the wrong company);
- calls where the customer is calling about a non-appointed activity and the call has no connection with the appointed business;
- calls from non-households (or their representatives) where at the time of the call it is clear that the reason is solely about their non-household account or service to premises covered by their account;
- · calls dealt with by developer services; and
- calls regarding ongoing legal cases.

For some telephony/contact systems it will be easier to exclude these by 'coding' (that is, codes will be mapped onto 'excluded'/'wanted'/'unwanted'). But in others these will be excluded at the switchboard level. It does not matter which way a company system is configured, provided 'unwanted' contacts are identified robustly.

To avoid any doubt, the following are **included**.

- Calls from representatives (for example, Citizens Advice orsolicitors) except where they clearly represent non-households.
- Calls to organisations acting as agents for the company, such as local authority sewerage agencies, contractors and debt collection agencies. However, where the number of customer calls to an individual agency or contractor is below 1% of the total number received by the company, these may be excluded. This is to avoid undue data burden. The 1% is with a denominator of total calls including the agency calls since the number of calls should be known even if it is a data burden to provide the detailed customer information.

To avoid any doubt, an answered call is classed as 'excluded', 'wanted' or 'unwanted'. It does not need to be recorded against more than one category.

2.3.2 Wanted phone contacts

This is any phone contact from a customer that is wholly positive from the customer's point of view – for example, to make a payment, provide basic account information (such as change of occupier), or to request information (such as a leaflet or an application form).

Below, we set out the areas that customers consider to be positive contacts. So, they should be counted as 'wanted' contacts. For ease of reference, we have listed these 'wanted' contact areas under five high-level subject headings.

Charging/billing

- Customer requesting information/advice for example, requesting an application form or a leaflet.
- Customer making an account enquiry for example, requesting their balance, or payment dates.
- Customer making a payment.
- Customer providing a routine meter reading.
- Customer requesting a change to payment arrangements or their account details.
- Customer informing the company for the first time that they are moving house.
- Customer calling to make a payment or set up a payment arrangement following debt recovery action undertaken by the company.
- Customer calling to arrange/alter/cancel an appointment.

Water service

- Customer requesting information/advice for example, requesting an application form or a leaflet.
- Customer requesting a disconnection or re-connection (if the company disconnected in error, then any request for a re-connection should be recorded as an 'unwanted' contact), or use of a hydrant.
- Customer calling for the first time to report a leak. Companies can count the
 first call from that customer as 'wanted' (unless it is a complaint). Calls about
 leaks on the customer's household supply pipe are also counted in this way.
 Repeat/chase calls from that customer are counted as 'unwanted' (unless the
 company can demonstrate robustly that the contact is a call back for an
 appointment). All calls about leaks are counted as 'unwanted' if
 companies cannot distinguish robustly between first-time and
 repeat/chase calls. A sampling approach is not appropriate.
- Customer calling for the first time to report or request assistance with frozen private household pipework. Companies can count the first call from that customer as 'wanted' (unless it is a complaint). Repeat/chase calls from that customer are counted as 'unwanted' (unless the company can demonstrate robustly that the contact is a call back for an appointment). If companies cannot distinguish robustly between first-time and repeat/chase calls, all of these calls are counted as 'unwanted'. If, at the point of the first call, companies cannot diagnose/identify the issue as a private issue (that is, the customer's responsibility) then all calls are counted as 'unwanted', by default. A sampling approach is not appropriate.
- Customer calling at the company's request as part of a managed process –
 for example, as part of a 'no water' contact (such as reporting back if the no
 water affects their neighbours as well). To avoid any doubt, calls such as
 those where a customer has been asked to report further instances of poor
 service (such as low pressure) are counted as 'unwanted' as they relate to a
 new/separate service failure.
- Customer calling to arrange/alter/cancel an appointment.
- Customer calling to make representations on a company notice of temporary use ban/drought restrictions.

Wastewater service

- Customer requesting information/advice for example, requesting an application form or a leaflet.
- Customer calling to request a disconnection or re-connection (if the company disconnected in error, any request for a re-connection should be recorded as an 'unwanted' contact).
- Customer calling for the first time to report or request assistance with a blockage in a private household sewer/drain. Companies can count the first call from that customer as 'wanted' (unless it is a complaint). Repeat/chase calls from that customer are counted as 'unwanted' (unless the company can demonstrate robustly that the contact is a call back for an appointment). If companies cannot distinguish robustly between first-time and repeat/chase calls, all of these calls are counted as 'unwanted'. If, at the point of the first call, companies cannot diagnose/identify the issue as a private issue (that is, the customer's responsibility) all calls are counted as 'unwanted', by default.
 A sampling approach is not appropriate.
- Customer calling at the company's request as part of a managed process –
 for example, as part of a flooding incident (such as reporting back on the
 extent of the flooding/neighbours affected). To avoid any doubt, calls such as
 those in connection to a further sewer flooding incident are counted as
 'unwanted' as they relate to a new/separate service failure.
- Customer calling to arrange/alter/cancel an appointment.

Metering

- Customer requesting information/advice for example, requesting an application form or a leaflet.
- Customer enquiring about or applying for optional metering.
- Customer calling at the company's request as part of a managed process –
 for example, as part of a meter application. To avoid any doubt, calls such as
 those in connection to a faulty meter are counted as 'unwanted' as they relate
 to a service failure.
- Customer calling to arrange/alter/cancel an appointment.

Other

- Customer requesting information/advice for example, requesting an application form or a leaflet.
- Customer requesting water efficiency information or products.
- Customer calling about recreational and amenity activities which are not defined as duties imposed by the Water Act 1989 – for example, visitor centres at company sites, water skiing or angling.
- Customer requesting a non-appointed activity, such as plumbing/private drainage services (for example, Homeserve). To avoid any doubt, calls about customer-side leaks and private sewer/drain blockages are counted in line with the guidance above.
- A customer calling to arrange/alter/cancel an appointment.

To minimise the regulatory burden, Ofwat will not specify how companies' systems are configured. Companies should use their own judgement in setting up internal phone contact codes or other processes to categorise and count phone contacts. But calls may only be excluded or counted as 'wanted' where a company has robust systems in place to distinguish them from other calls. It will be for companies to consider whether the cost of distinguishing particular types of 'wanted' calls is justified relative to the volume received.

Codes that can be clearly and demonstrably mapped to one of the categories outlined above (subject to them not being a repeat or chase call or a complaint) can be counted as 'wanted'. Any codes that cannot be clearly and demonstrably mapped to a 'wanted' category are counted as 'unwanted' phone contacts.

Apportionment or sampling to sub-divide codes containing both 'wanted' and 'unwanted' contacts is not appropriate. If the code cannot be wholly and demonstrably mapped to 'wanted', it is counted as 'unwanted' by default.

2.3.3 Unwanted phone contacts

This is any phone contact received from a customer that is – from their point of view – 'unwanted'. It is a contact about events/actions that have caused unnecessary aggravation (however mild) on/to the customer, including repeat or chase calls. This is determined by the subject matter of the call. A call is classed as 'unwanted' by default unless it is defined as 'wanted' on the list above. A repeat or chase call or phone complaint is counted as an 'unwanted' contact (see below for details). If a call has not been coded/logged, then it is counted as 'unwanted' (except where it was classed as 'excluded' or 'abandoned').

Repeat or chase call

This covers any call where a customer has needed to chase the company (or contact the company again) in relation to the same event, query or issue about which the customer has already been in contact.

The following are examples of chase calls.

- A customer calls the company to request a leaflet/information pack, but then
 has to call again as they still have not received it.
- A customer calls the company to check why they have not heard from the company following their application for a meter.
- A customer calls the company because a replacement bill/payment book has not been received in the promised timescales.

Although a distinction could be made between repeat calls and chase calls, these both count as 'unwanted'.

Customers may contact the company to check that action has been taken on an earlier enquiry. This is a repeat call, even if the company has acted on the first enquiry. It is up to the company to communicate to the customer that action has been taken so the customer does not feel the need to chase the company.

There is no minimum or maximum time limit on what constitutes a repeat call. Some contacts will take longer to resolve than others. For example, a meter request may take longer than a billing enquiry. The onus is on the company to ensure the customer understands and accepts the timescales involved to avoid them needing to make a repeat call.

Phone complaint

Although most 'unwanted' calls can be identified by the subject matter of the call, there will be a small volume of calls about a 'wanted' topic but where the customer is expressing dissatisfaction. To ensure these types of calls are picked up in this measure, all phone complaints (as defined below) are classed as 'unwanted'.

A phone complaint covers any phone call from a customer alleging that an action or inaction of the company, or a service or lack of service provided by the company or agent/contractor has fallen below their expectation (however mildly expressed). This includes any expression of annoyance or dissatisfaction by the customer, or disagreement with the company, even if the basis for the complaint is incorrect or unjustified.

Any call that includes reference to a failure to make phone contact is a complaint/ 'unwanted' contact – for example, "It's taken four attempts to get through to you today", or "I got really lost in your 'phone system' and gave up".

Managed process

This is a process that has been agreed to by the customer and the company to resolve a known issue. An example of this would be where a customer has called to report a 'no water' incident and the company asks the customer to check with a neighbour to see if they have water and then call back. The first call is 'unwanted', but the call back is part of the process for resolving the issue. So, as part of the managed process of resolving the 'no water' issue, it is a 'wanted' call. This is not the same as a repeat/chase call.

The exception to this would be when a customer expresses dissatisfaction – for example, they are annoyed about having to call back. In this case, the call would be counted as 'unwanted'. If a company cannot identify robustly calls that are part of a managed process or distinguish if the customer is unhappy at having to call back, they are counted as 'unwanted'.

Calls that follow a company text alert or message manager are not in a managed process.

Multiple issues

If an 'unwanted' issue is mentioned during the course of a call, the call is counted as 'unwanted'. This is regardless of any other issues the customer raises. It may be the case that the 'unwanted' issue is not the first issue raised.

We do not expect companies to count more than one 'unwanted' issue per call. This is intended to ensure consistency and fairness between those companies that are only able to count one issue per call and those able to count all issues per call.

Calls to automated/IVR lines or where a customer hears a recorded message

These calls are included as 'unwanted' unless the company can demonstrate robustly that they relate to a 'wanted' contact type on the list above.

Phone contacts received on behalf of another company which relate to the other company's policies and procedures

If companies bill on behalf of others, the guiding principle is that the contact should be counted by the company that deals with it.

Phone contacts to/about contractors

Phone contacts from customers to contractors or other agents about work being carried out on the company's behalf are included, even if the contractor or agent deals directly with the communication. This would include where a company outsources part of its operations, such as debt recovery to a debt collection agency, instead of dealing with it in-house.

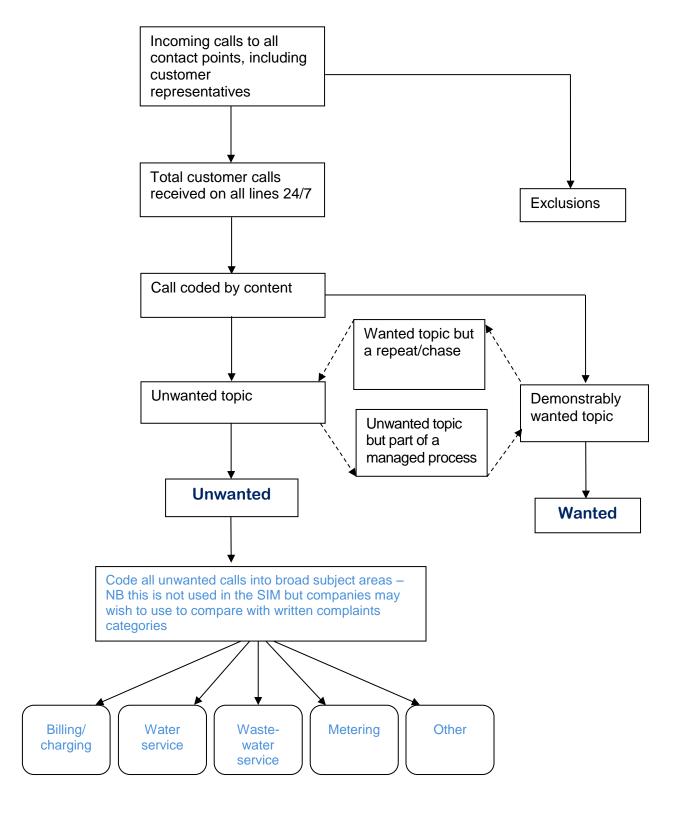
Calls to company staff mobiles

Where customers have access to company mobile numbers, companies should satisfy themselves that any 'unwanted' contacts to these numbers are being counted (or is such a small volume as to be not material). We have set out some examples below.

Table 2 Examples of counting customer contacts to staff mobiles

Intended reason for contact	Customer reason for contact	Comment on counting	
Customer call to staff mobile for specific purpose – for example, to arrange access	Arrange for access for meter reading/other work – resolved in call	'Wanted' contact part of managed process, expect most calls to be in this category	
	Ask question about original matter – resolved in call		
	Ask question about unrelated matter	Refer to contact centre to deal with – contact recorded at this point	
	Complain about different matter		
	Complain about original matter	Resolved in call – it is these calls that ideally should be included in 'unwanted' contact data	
		Refer to contact centre to deal with – contact recorded at this point	

The flow chart below illustrates how phone contacts are sifted to determine whether they are 'wanted' or 'unwanted' contacts.



3. Providing customer experience satisfaction survey data sample to market researcher

3.1 Definitions

- All contacts. This refers to all those contacts that the company has received during the designated sampling period, from all sources and from any customer except for contacts to developer services.
- Customer experience satisfaction score. This is an annual score produced by four waves of customer satisfaction surveys that will take place at intervals throughout the year. The surveys are based on contact data that the company provides to an independent market researcher. The data for all contacts for the designated period is sent to the market researcher for each wave of surveys. The market researcher is appointed by Ofwat and will carry out the surveys for all companies.
- Designated period. The period of time specified by the market researcher
 when requesting a survey sample from the companies. This is usually the
 previous seven days. Companies where we already know the operational
 contact rate yields a small weekly sample size will be asked for contacts from
 the previous two to three weeks.

3.2 Aim

The aim of the customer experience survey is to capture the views of those customers who have had dealings with the company, not only through the main contact centre but to any part of the business or to a contractor. It is intended to capture views on how the contact was handled.

The surveys are based on contact data that the company provides to an independent market researcher. The data for all contacts for the designated period is sent to the market researcher for each wave of surveys. The market researcher is appointed by Ofwat and will carry out the surveys for all companies. The market research asks a series of questions. The results (Q8) from asking "Taking everything into account how satisfied are you with the handling of this matter by [Water Company Name]?" are used for the customer experience satisfaction score. The market researcher provides companies with a report that combines the results of all four scores each year.

3.3 Guidance

3.3.1 Weighting of satisfaction score

The overall satisfaction score derived from the survey will be weighted so that 50% of it is made up of billing contacts, and 50% of it is made up from operational contacts. The market researcher will do this.

3.3.2 Nature of sample

The survey will cover any customer, or their representative, who has contacted the company by phone, in writing, by email, or through the company's website during the designated period. This includes contacts to agencies working on behalf of the company (such as debt collection agencies).

Where more than one data point is generated for a particular customer issue (for example, a call may generate work in the field so the company's system may produce two data points – one from the call centre and one from the work management system), the market researcher will work through the data provided and remove duplicates from the survey sample.

3.3.3 Collation of sample

The company is asked to produce a set of data covering all contacts received during the designated period. There will be no notice given for this, such that, for example, on a Monday morning companies will be contacted and asked to provide their sample from the previous week. The sample will be provided by 5 pm on the next day (Tuesday).

Please contact Ofwat and the market researcher if you find upon notification there will be difficulties in providing sample to deadlines so a work around solution can be agreed.

The market researcher will need details of the category of the contact and, where available, the customer's phone number (or number of any representative calling on their behalf). The market researcher will provide a sample template to each company that sets out exactly the information needed. Metering contacts (for example, contacts related to a meter reading) should be included in the billing sample for consistency.

The market researcher will remove duplicates from the data provided and select a randomised sample reflecting the balance of contact types. The selected sample will be structured to include:

- billing;
- water operations; and
- wastewater operations (where appropriate).

The market researcher will exclude:

- internally raised contacts;
- · head office visit contacts; and
- contacts involving other water companies from the sample.

Companies will still be expected to include all contacts.

3.3.4 Other useful points about sample provision

Where a company uses regional company names, these may be indicated in the sample so customers more readily associate with and recall the company contact.

Avoid using internal jargon or codes for 'call reason'. Survey agents and customers will not necessarily understand these.

While the primary route for excluding non-households will be by response to (Q3) "Was this contact in regard to [water company name] supplying you as a domestic or business user?", companies may still flag the contacts they consider to be non-household. This will be used to compare with customer responses during data analysis.

3.3.5 From all sources

Companies should provide all contacts received from all sources. This includes:

- by phone (including fully automated for example, a bill payment);
- in writing (including web forms);
- by webchat on company websites;
- by email; and
- by visit.

This includes all calls to all lines, 24 hours a day, 7 days a week, regardless of whether the line is a principal advertised contact point. It also includes calls to automated systems and agencies working on behalf of company, such as debt collection agencies.

It will also include contacts from:

- landlords;
- 'mixed-use premises'; and
- customer representatives.

Where these are in connection with a non-household matter they will be screened out during the surveying.

This may also include contacts where the initial contact was through a company's social media 'inbox'. These are usually anonymous at this initial stage and companies typically encourage follow-up by other types of contact channel, especially where the matter relates to a customer's account.

The company may **exclude** from the data provided to the market researcher:

- contacts made to advise that a customer is deceased, or in relation to a deceased customer;
- non-customer contacts for example, calls from contractors and suppliers;
- · contacts dealt with by developer services;
- those that the company knows to have been from a customer who has an ex-directory number;
- wrong numbers, including calls where a customer is referred to another company (that is, where the customer has contacted the wrong company);
- where the customer is calling about a non-appointed activity and the call has no connection with the appointed business – for example, insurance services); and

calls to organisations acting as agents for the company – for example, local authority sewerage agencies, contractors and debt collection agencies can be excluded where the number of customer calls to an individual agency or contractor is below 1% of the total number received by the company. This is to avoid undue data burden. The 1% is with a denominator of total calls including the agency calls – since the number of calls should be known even if it is a data burden to provide the detailed customer information.

Companies **should not** remove duplicate contacts from their sample data. The market researcher will do this.

Companies **should not** remove non-household contacts from their sample data. The market researcher will do this with a screening question at the start of the survey.

4. Written complaint information

Appendix 1 sets out CCWater's guidance for complaint handling and the information companies provides to it each year. The written complaint data used for SIM calculations is the same information.

To be clear, complaints reviewed by the water redress scheme (WATRS) and non-household complaints are not included in the household SIM.

5. Connected properties

5.1 Definition

• Connected properties. The total of the number of properties connected for water supply only, wastewater services only, and water supply and wastewater services at the end of the report year. This must include properties which are connected but not billed (for example, temporarily unoccupied) but should exclude properties which have been permanently disconnected. A group of properties supplied by a single connection should be counted as several properties. They should only be treated as a single property if a single bill covers the whole property.

5.2 Guidance

The number of connected properties is used to normalise performance data to enable comparisons between companies of different size.

5.2.1 Household SIM

The data used is the total number of household properties connected at the year-end for:

- water supply only;
- water supply and wastewater services; and
- wastewater services only (water and wastewater companies only).

5.2.2 Non-household SIM

The data used is the total number of non-household properties connected at the year-end for:

- water supply only;
- · water supply and wastewater services; and
- wastewater services only (water and wastewater companies only).

5.2.3 CCWater analysis

CCWater will require both the household and non-household connected property numbers. Additionally, they require metered properties as a subset of this information.

6. Non-household SIM (Wales)

The retail market opening will not apply for those customers served by a company operating wholly or mainly in Wales. So it is important to continue to safeguard and incentivise improvements in service for non-household customers served by Dŵr Cymru and Dee Valley Water.

The non-household SIM for Wales will take the form of a quantitative measure based on:

- written complaints;
- escalations; and
- CCWater investigations.

This will be determined in exactly the same way as set out in chapter 4 and appendix 1, except it will only include non-household complaints. The full suite of SIM measures used for the household SIM are not appropriate to use for the non-household SIM because of the smaller number of non-household customers compared with the number of household customers. Companies can employ other outcome delivery incentives (ODIs) to complement the SIM where appropriate for their customer base.

The denominator will be applied as set out in chapter 5. This will produce a figure for non-household written complaints per non-household connection. This will allow comparisons with the English companies' performance in terms of non-household written complaints per non-household connection.

7. 'Other' contact channels

Information provided by companies during 2014 confirmed that the current SIM quantitative measures are based on the most common forms of contact – that is, phone (74% of contacts) and written (which includes website, 25% of contacts). The remaining 1% covers other emerging channels like social media. We will continue to check their usage rates to ensure SIM continues to capture the vast majority of customer contacts. So, companies should collect some indicative information about their customers' usage of all contact channels offered regardless of where they are currently part of the SIM. As noted elsewhere in this guidance, it will be the case that some contacts that initially started out on social media will be included in both qualitative and quantitative measures because they are followed by other methods of contact to provide the necessary privacy – for example, a phone call to discuss account matters.

Appendix 1: The Consumer Council for Water's guidance for complaint handling³

A1.1 Purpose

- Provide companies with guidance on the process and reporting of written complaints from all customers, including the initial customer complaint, second stage/ subsequent escalations, CCWater investigations and independent adjudication by the Water Redress Scheme (WATRS).
- This guidance covers the whole written complaint process.
- Companies are asked to provide the number of written customer complaints and written complaint escalations by five main categories (billing and charges, water service, wastewater service, metering and other activities) received by companies in the reporting year.
- Household customer complaint numbers form part of the quantitative element of Ofwat's household service incentive mechanism (SIM). All of the information on household and non-household complaints is to be included in Consumer Council for Water's annual report, 'Complaint handling in the Water Industry in England and Wales'.
- Table A1 below summarises information needed by CCWater. The 'total all categories household customers' will be used in the household SIM calculation from 2015. The 'total all categories non-household customers' will be used in the non-household SIM (Wales).

Companies are asked to separate complaints and second stage escalations for each category for household and non-household customers. This will be a formal requirement for the 2015-16 submissions.

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³ Note: Formatting of this appendix is consistent with Ofwat's house style.

Table A1 Information to be provided to CCWater

Complaint categories	Total written complaints	Total written complaints escalated to second stage or further reviewed1	Total written complaints	Total written complaints escalated to second stage or further reviewed1
	Household customers		Non-household customers	
Charging and billing issues				
Water service issues				
Wastewater service issues				
Metering issues				
Other service issues or activities				
Total – all categories				
Supplementary information				
Charges and billing from metered customers				
	Total		Total	
Connected properties ² – water only				
Connected properties ² – water and wastewater				
Connected properties ² – wastewater only				
Metered properties ²				

Notes

A list of what complaint type should be allocated to which category is set out at the end of this guidance.

In addition to the table, CCWater requires a brief written commentary to facilitate its understanding of company performance for its annual complaint handling report. The commentary should include reasons for significant differences in the total numbers or for any individual category.

¹ These should also be counted in the relevant total complaints column.

² For property definitions see chapter 5.

A1.2 Common definitions

A1.2.1 Customer

A person/s who consumes water and/or wastewater services provided or are to be provided by a company in the course of its business as a statutory undertaker, including but not limited to the person/s on whom liability to pay charges for such services would fall. This includes developers and self lay organisations.

A1.2.2 Written complaints

This covers any written communication from a customer or a customer's representative (e.g. Citizens' Advice Bureau, solicitor), **alleging** that an action or inaction of the company, or a service or lack of service provided by the company or agent/contractor has fallen below their expectation, even if written in mild and friendly terms. This includes any expression of annoyance or dissatisfaction by the customer, or disagreement with the company. Written complaints include those made by letter, fax and email and comments written on a piece of company correspondence which the customer returns to the company, such as a bill, except where it is threatening or abusive to an individual. Companies should include complaints received via social media if it is advertised as a contact method for making a complaint. 'Advertised' includes: company sources (for example, letters, complaint leaflets, reports and website) and public sources of information (for example, printed and electronic directories).

Figure 1 below provides the written complaint process from the first contact to a CCWater investigation and where the customer applies to the WATRS scheme after the company and CCWater involvement. The SIM does not apply to non-household customers or to customer contacts received beyond CCWater involvement.

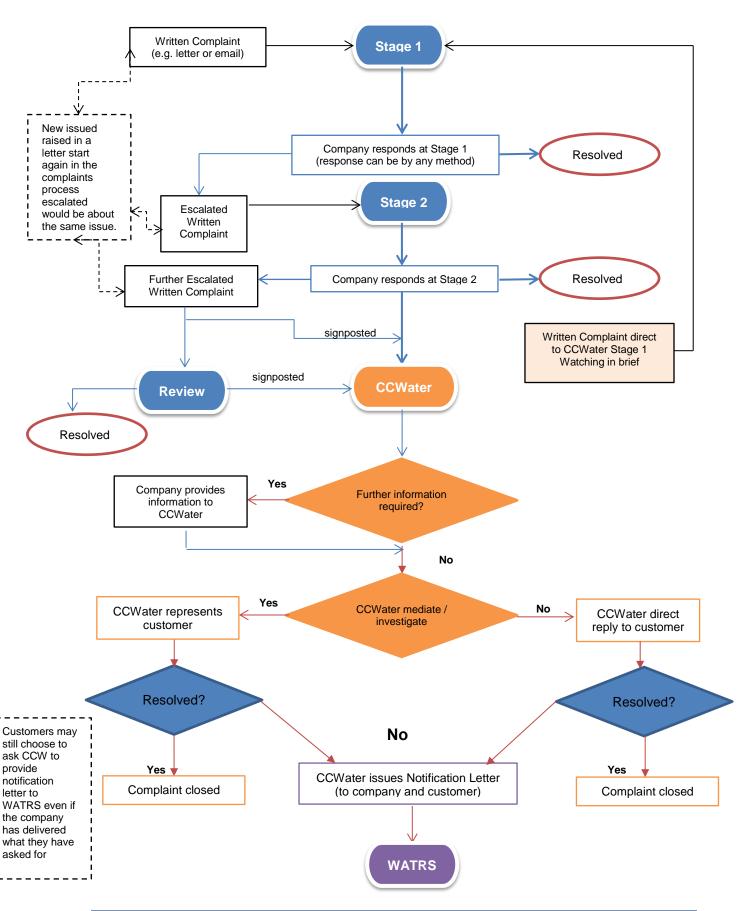


Figure 1 Written complaint from customer/customer representative

A1.2.3 Exclusions

Companies can exclude from the reported figures those written complaints that are:

- anonymous; (where the company cannot identify or respond to the customer);
- made through social media, web chat or via SMS text messaging unless a company advertises it as a contact point for making a complaint in its literature or website;
- about the activities of other undertakers or other utilities for example signage around trenches or road works carried out by another utility company;
- not about the services or functions of the company for example complaints about executive salaries, sponsorship activities and company advertising campaigns, to avoid doubt, complaints to companies that are, or turn out to be on the customer's own pipework should be reported;
- about non-appointed activities, such as plumbing services, consultancies;
- about recreational and amenity activities which are not defined as duties imposed by the Water Act 1989, for example visitor centres at company sites, water skiing and angling;
- returned in response to/alongside customer satisfaction survey questionnaires/cards (such complaints could be said to have been initiated by the company and would not have arisen but for a prompt by the company);
- written compensation claims which are not contained within a written complaint –
 examples include a bespoke claim form or where a compensation claim form is
 issued as part of a managed process. Written complaint letters or emails
 accompanying the claim form should be treated as a written complaint;
- part of a legal liability / litigation process and are therefore being handled by solicitors, insurance companies, loss adjusters or other specialist staff (but not where it is part of the company's debt recovery procedure):
- continued correspondence after the company believes it can do no more to resolve the complaint; (post stage 2), provided that the company has informed the customer of this and has signposted the customer to CCWater;
- requests for further information where there is no element of dissatisfaction within the contact;
- received from statutory bodies or authorities acting in accordance with their duties rather than as a customer or customer's representative such as a local authority, DWI, EA who express dissatisfaction on a general issue;
- any written contact from a customer where the company has asked for specific information relating to his or her complaint to resolve a known issue, (a managed process*) providing the contact does not express dissatisfaction in accordance with the written complaint definition;
- written contacts relating to a complaint after it has reached deadlock which is being considered or going through the WATRS scheme, including notification or option letters provided to the company for information by CCWater and WATRS written contacts / decisions;
- a response to a company consultation;

- duplicate/copy complaints where the customer writes in about the same issue on the same day, (with the exception of repeat emails which are clearly not a duplicate and not a chase) through multiple channels, (for example the customer or customer's representative);
- more than one letter about the same issue to two different people at the company;
 and
- any comments that are threatening or abusive to an individual.

A1.2.4 Response to customer

This is defined as a response to a written complaint that does one or more of the following.

- Provides an explanation of the company's relevant policy or procedure and indicates why, in the company's opinion, no further action on the customer's complaint is required;
- Informs the customer that action to resolve the complaint has been taken and identifies when the action occurred for example, flushing of mains.
- Informs the customer of when action to resolve his/her complaint will be taken if action cannot be taken immediately; for example, "programmed capital works are not scheduled until month and year, and should be completed by month and year".

Whichever type of response is provided it **must** substantively answer **all** issues/questions raised by the customer.

A1.3 Guidance

A1.3.1 CCWater

The purpose of this section is to clarify how companies should report written contacts from CCWater offices. To avoid any doubt, the recording of written complaints received through the appropriate CCWater office on behalf of the customer should be included.

How CCWater forwards customer contact is a matter of ease between the company and CCWater, and should not necessarily define whether a contact is a written complaint or an unwanted telephone contact. Companies should continue to use procedures already established with their respective CCWater offices. For the purposes of clarification in relation to SIM weightings attracted by such contacts, CCWater is well placed (as it has typically

^{*} A managed process should be agreed by the customer and the company to resolve a known issue. Examples include where the customer is providing specific information the company has asked for, such as availability for site visits or to provide meter readings. If the customer expresses dissatisfaction with having to write to the company again, the company should report the contact as a Stage 1 written complaint.

already spoken with the customer) to advise how the customer contact should be recorded. Some examples follow (although this is not intended to be a complete list of possibilities).

- CCWater forwards customer complaint letter report as written complaint unless this is a duplicate of one already received by the Company;
- CCWater makes a recommended resolution not previously raised by the customer for a complaint which has exhausted the company procedure

 — treat as an enquiry unless CCWater advises otherwise;
- CCWater establish facts from a visit, phone call or letter from a customer and determines that it has a duty to assist by writing a letter on the customer's behalf– report as written complaint;
- CCWater forwards simple phone complaint (for example, by phone or email) report as an unwanted telephone contact unless stated otherwise by CCWater office;
- CCWater establishes facts from customer visit or phone call or letter; and then
 determines that it can resolve on customer's behalf with company by phone report
 as unwanted telephone contact;
- CCWater forwards a copy of correspondence from a customer to the company which
 the company has already received do not report as an additional written complaint
 but append to the initial complaint and inform CCWater of the proposed outcome for
 the customer report as exclusion, duplicate copy;
- CCWater requests information/update regarding an existing complaint treat as an
 enquiry (in the event the company does not respond or does not carry out an agreed
 action on the complaint, CCWater may consider the company has had a reasonable
 opportunity to resolve the complaint and escalate or investigate the complaint);
- CCWater requests further information from the company for a complaint which has exhausted the company procedure (a pre-investigation letter) treat as an enquiry;
- CCWater contacts the company to find out at which stage of the company procedure the complaint is – treat as an enquiry;
- CCWater forwards a copy of a letter to a company which advises customers they are eligible to use the WATRS service treat as information only;

Where possible, CCWater will notify the company of the relevant complaint stage in all correspondence they forward. Companies should expect a complaint which has gone through all stages of their procedure may lead to a CCWater investigation. In cases where there is enough information, CCWater may not send a pre-investigation letter.

A1.3.2 Petitions

If a petition is submitted to the company, the company **must** respond to the customer who has sent in the petition. Depending on the nature of the petition, the company may also choose to respond separately to each person who has signed the petition. Companies should report as individual written complaints the number of separate contacts received through the petition - for example, where a number of customers have used the same standard letter and have sent it to the company separately.

If the petition is submitted as one written contact, then it should only count as one written complaint, whether the company chooses to respond just to the person who sent in the petition or to all of the signatories.

A1.3.3 Contacts not dealt with at end of year

Where the company does not deal with some written complaints at the end of the year, the company is to use one of the following methods:

- The complaint is to be included in the total number of complaints *received* for the year in which it is received and the response time is also to be included in the same year's information, although it may continue into the following year.
- The complaint is to be included in the total number of complaints received for the year in which it is **dealt with** and the response time is also to be included in that year's information, although it may have started in the previous year.

Whichever method is adopted, care should be taken to ensure that undercounting or double counting does not occur and that the method used is consistently applied in subsequent years.

A1.3.4 Holding reply

This is defined as a response to a written complaint, which advises the customer that the company will need to carry out additional research or other actions before being able to respond to the customer's contact. A holding reply can be counted as a **substantive response** if it informs the customer what further action needs to be taken to respond to the query and includes a date by which investigations or further actions will be complete and by when the customer will receive a further communication from the company. A substantive holding reply will close a contact for reporting purposes but not for the company until all actions have been taken and a further response is sent to the customer. Companies are advised not to use holding replies excessively as timescales may be a factor following the introduction of WATRS adjudication.

Where companies are unable to provide the date by which investigations or further actions will be complete companies must include the number of days in which they will contact the customer again **and** the number of days after the contact that the substantive response will be sent to the customer. For example, where a visit is required the response should state the company will be in contact within XX days to arrange the appointment and that a substantive response will be provided XX days after the visit.

A1.3.5 Reporting written billing complaints received about another undertaker's policies and procedures:

Where companies bill on behalf of other undertakers, care should be taken about how written complaints are reported. The guiding principle is that the company that responds to the written complaint should report the complaint.

A1.3.6 Reporting complaints to/about contractors

Complaints *to* contractors or other agents about work they are doing on behalf of the company **must** be reported, even if the contractor or agent deals directly with the complaint.

Companies must also report complaints **about** contractors or other agents as a written complaint, even if the complaint is referred to the contractor to resolve.

A1.3.7 Answering written complaints by telephone or by visit

Where companies use the telephone or make a visit to respond to a written complaint, then the date of the phone call or visit will count as the date of response provided that the call or visit provides a substantive response to the customer. Phone calls or visits that acknowledge receipt of the written complaint or do not address all of the issues raised by the customer will not be deemed as substantive and further written contact from the customer should be escalated in the company procedure.

A1.3.8 An escalated complaint (stage 2 escalation)

This is defined as a second written complaint from a customer relating to the same issue or issues that, in accordance with the company's approved complaints procedure, is usually reviewed by a person or persons not involved in providing the response to the customer's first complaint.

We expect companies to assume customers remain dissatisfied if they send a second written contact about the same issue and it does not fall under the exclusions listed in section A1.2.3 of this guidance.

Companies should report these contacts as a second stage complaint – that is, an escalation of the initial complaint following receipt of the company's initial response. These carry a higher penalty in the quantitative element of the SIM for household customers, unless the escalated complaint raises new issues, such as those set out below.

Companies are advised not to allow complaints to become protracted and should signpost customers to the next stage of their procedure in case they remain dissatisfied. Subsequently, companies should signpost customers to CCWater when the complaint has exhausted their procedure.

New Issues (so not a stage 2 escalation)

In some cases, subsequent written contact from a customer expressing dissatisfaction will raise a new unrelated issue instead of or in addition to the original service failure. Examples of this may include:

- attitude of company staff;
- the date or timeline to resolve operational works; and
- compensation for the original service failure if it is not mentioned in the customer's first contact or is not part of the resolution of the initial complaint.

A company should only report these contacts as a stage 1 complaint if it can evidence the new issue(s) were not raised in the previous written complaint connected to the original service failure and could or would change the company position of the original complaint (whether it ultimately does or not), or the original complaint has been resolved to the customer's satisfaction.

In all other cases concerning a new issue, the company should assume the complaint relates to the same grievance and report the complaint as a stage 2 escalation.

If further written contact from the customer has no relation to the original complaint, then the company should begin the complaint process from stage 1 providing it falls under the definition of a written complaint in this guidance.

If a customer sends a second written complaint about the same issue but the company has not had chance to respond (such as a contact sent before their published response time from the original complaint) then the company should treat the complaint as a stage 1, unless the second letter counts as a duplicate under the 'Exclusions' at A1.2.3 above.

Similarly, if a customer contacts the company and says there has been no reply to the first letter then the company should treat that as a stage 1 written complaint unless the company received the first letter and failed to respond in their published response time in their written complaint procedure.

Requests for information, such as an update on planned works should be treated as an enquiry.

New Information (so not a stage 2 escalation)

A customer may provide new information in relation to his or her complaint. If the new information relates to the original complaint but is substantial enough to change the outcome, then the company may report it as a stage 1, even if it the company reviews the complaint and decides no further action is necessary.

The company should escalate subsequent written complaints in their usual way or signpost the customer to CCWater.

If the new information the customer provides is something the company should have been aware of, such as their own literature, action, works or contact to the customer, the company should report the complaint as a second-stage or escalated complaint.

Complaints dealt with by the same member of staff

Customers may address a second written complaint to the company representative who responded to the first correspondence. If the second letter provides no new issues or information, and the same member of staff responds, then the company should record the complaint as an escalated complaint (stage 2). We urge companies not to undertake protracted correspondence with customers and follow a consistent approach in escalating complaints. CCWater will investigate a complaint if the company has deviated from its procedure (such as not escalating a complaint from several written contacts from the same customer) and there are further issues.

Depending on the nature of the complaint (for example, an allegation of gross misconduct), some companies require a senior manager rather than a customer service agent or equivalent to address the complainant's concerns when such a complaint is first received. In such circumstances, the company should classify the complaint at the first stage of their complaint procedure. If the customer remains unhappy and follows up the initial complaint, then this second letter is to be recorded as an escalated complaint (stage 2), unless one of the above exemptions applies.

Where a Managing Director or Chief Executive Officer responds to the first written complaint, then the company should record it as a stage 1. A second written complaint from the customer, which provides no new significant information or issues, should be reported as an escalated complaint (stage 2) and preferably dealt with at the same level to prevent it going backwards into the company procedure.

In some cases, the Managing Director or Chief Executive Officer may consider the first response is their final stage. In this scenario, the customer should be advised of this in the response to their first letter and the complaint should be reported as a stage 1. Where this applies, and the company does not wish to carry out a further review after the first letter, the second customer correspondence should fall under the exclusion, 'continued correspondence after the company believes it can do no more to resolve the complaint.' In these circumstances, the customer should be advised to approach CCWater.

Long standing complaints

Customers with a complaint which has exhausted the company procedure and where CCWater has been involved after 4 weeks (or 8 weeks if the complaint is being investigated) will be given the option to take the complaint to WATRS. This will be communicated with the company.

Complaints post-escalation (that is, exhausted complaints)

CCWater believes companies should strive to have no more than two stages in their complaint procedure.

If a customer contacts the company, and the company advises the customer that they have exhausted its complaint procedure and the next step is CCWater (in their final letter as well as their complaint leaflet), then all correspondence beyond that advice need not be reported unless it raises significant new issues or new information.

If a company chooses to have a third stage in their procedure, or further reviews the customer complaint beyond the second stage if the customer chooses not to go to CCWater, then the complaint should be reported as a stage 2 escalation in the column, 'Total written complaints escalated to second stage or further reviewed' on table A1 separated depending on customer type.

Where a company continues to correspond beyond their second (or third) stage and reviews the complaint, or is prepared to do more, rather than advise the customer to approach CCWater or inform the customer that it will no longer respond on this matter, then these contacts should be reported as an escalated complaint (stage 2). We ask companies to provide in their written commentaries the number of complaints they reviewed by category beyond the usual second (or third) stage in their procedure.

A1.3.9 CCWater investigations

CCWater will investigate a complaint under the following criteria:

- When the company procedure has been exhausted and there are remaining issues that should be addressed by the company;
- Where there are long standing service failures that the company were aware of but failed to action; or
- Where the company has not correctly escalated a complaint in line with its complaints procedure and CCWater would have investigated the complaint if the company had.

In all cases, an investigation will involve a challenge to the company by CCWater.

Service incentive mechanism – guidance for collating customer service information for calculating the SIM score

A company may appeal a decision by CCWater to investigate a complaint. To ensure consistency, the appeal will be based on whether CCWater has correctly adhered to the processes in this guidance rather than the merits of the complaint. Companies should appeal based on the criteria in this guidance.

Companies are not bound by CCWater's recommendations. CCWater will notify customers whose complaints have gone through the company procedure of the option of taking the complaint to WATRS for an independent, binding decision on the company. A copy of the notification letter to the customer will be sent to the company.

Following the WATRS notification letter, all subsequent written contacts on the customer's complaint is not to be reported and CCWater's involvement will cease. For the avoidance of doubt, all written contact prior to the WATRS notification is to be reported in accordance with this guidance.

A1.4 Complaint type and category

This list was updated following the discussions held by Water UK in early 2007. For consistency, companies should match their own categories as close as possible to the list.

Complaint type and category

Reference	Complaint type
	Charging and Billing
Unmeasured bills	Increase in charges
	Disputed liability
	Billing error – underpayment
	Billing error – overpayment
	Payment methods – cash, cheque, direct debit etc
	Payment arrangements – annual, half yearly, monthly etc
	Payment facilities - Paypoint, local authority offices
	Tariff structure – balance between standing and variable charge
	Standing charges – level
	Use of uniform charges
	Use of rateable value for charging purposes
	Size of customer's rateable value (outside CCWater jurisdiction)
	Assessed charge where a meter cannot be fitted
	Failure to receive payment book/bills/reminder
	Incorrect account info/failure to register customer details
Measured bills	Disputed liability
	Billing error – underpayment
	Billing error – overpayment
	Payment methods – cash, cheque, direct debit etc
	Payment arrangements – annual, half yearly, quarterly, monthly
	Payment facilities – Direct Debit, Paypoint etc
	Leakage allowance – entitlement to/amount of
	Non return to sewer allowance – entitlement to/amount of
	Tariff structure – balance between standing and variable charge
	Standing charges – level
	Volumetric Charges – level
	Highway Drainage Charge
	Surface Area Charges
	Surface water drainage charge
	Meter reading frequency

	Estimated bills – too high a reading
	Estimated bills – company rarely take an actual reading
	Disputed meter reading
	Recalculation of direct debit schedule
	Reversion to unmeasured charging (following meter installation)
	Failure to receive payment book/bills/reminder
	Incorrect account info/failure to register customer details
Debt Recovery	Debt Recovery Timetable
	Reminder notice
	Final notice
	Debt Collection Agency – use of
	Debt Collection Agency – attitude
	Judgements, including enforcement action
	Predisconnection contact – lack/quality of contact
	Legal fees
	Lack of advice/information to customers
Disconnection	Disconnection – adequate notification
	Disconnection – on the day arrangements
	Conditions imposed to reconnect the supply
	Disconnection/reconnection fees
Infrastructure charges	Infrastructure charges: Policy
	Infrastructure charges: Amount
	Infrastructure charges: Disputed application
	Infrastructure charges: Other
Vulnerable Groups	Vulnerable customers: Policy
	Vulnerable customers: Eligibility
	Vulnerable customers: Level of charge
	Vulnerable customers: Administration of scheme
	Vulnerable customers: Other

	Water Service
Restrictions	Hosepipe ban – general
	Hosepipe ban – inconsistency in application
	Drought orders
Interruptions to supply	Failure to notify of planned supply interruption
	Failure to restore by time specified
	Failure to provide alternative supply
	Failure to keep customers informed
	Inconvenience caused by supply interruption
	Damage and disruption caused by water from burst main/pipe
Maintenance	Replacement of lead/rusted pipes
	Disputed liability for repair to particular mains/pipes
	Disputed liability for repair to mains/pipes – general
	Disputed costs of repair to mains/pipes
	Damage and disruption during construction/repair of mains/pipe
	Supply Pipe Repair Schemes
	Leakage – failure/delay in repair of main/pipe
	Delay/Inadequate reinstatement by Company
	Ingress/Flooding from unknown source
Water Pressure	High pressure/Pressure Surge
	Low Pressure – Daily Problem
	Low Pressure – Seasonal Peak Problem
	Low Pressure – Intermittent/Irregular Occurrence
	Other pressure problem
Water Quality	Taste
	Water odour
	Boil water notice/do not use notice/do not drink notice
	Hard Water
	Change of water
	'Animals' in water, eg asellus
	Brown Water Discolouration/Appearance

	Other Water Discolouration/Appearance
	Other water quality complaint
Miscellaneous	Other problem associated with water treatment works
	Environmental nuisance from treatment works (water)

	Wastewater Service
Sewer Flooding	Sewer Flooding – Internal Only
	Sewer Flooding – External Only
	Sewer Flooding internal and external
Maintenance	Disputed liability for repair to particular sewers/drains
	Disputed liability for repair to sewers/drains/general
	Disputed costs of repair to sewers/drains
	Delay in repair to sewers/drains
	Damage & disruption during construction/repair sewers/drains
	New sewers/connections
Miscellaneous	Other problem relating to sewage treatment works
	Environmental nuisance from treatment works (sewage)
	Odours from sewers
	Rat infestation of sewers

	Metering
Policy	Application of metering policy
	Compulsory metering of new properties
	Compulsory metering of existing properties – change of occupier
	Compulsory metering of existing properties – targeted
	Information to customers on how to apply for a meter
Installation	Installation policy
	Installation cost (including company option and unavoidable DIY costs)
	Time taken to install meter by company
	Location of meter

	Quality of meter installation work by the company
Miscellaneous	Access/Maintenance/Replacement
	Accuracy
	Testing

	Other service issues or activities
Appointments	Failure to specify timed appointment (2hr window)
	Missed appointments by company representatives
Complaints	Failure to inform customer of company complaints procedure
	Failure to respond to query/complaint by phone or in writing
	Failure to make/inadequacy of ex-gratia payment
Administration	Other failure or delay in administration
	Attitude / behaviour of company staff
	Inability to contact appropriate company staff
	Poor advice from company
Telephony	Use of recorded messages
	Use of message management system
	Other complaint about company telephone system
Miscellaneous	Inadequate notice given by company
	Operation of published Company Charter (non statutory)
	Literature: Publications – contents of, cost & distribution

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