

RD 04/08: Appendix 2

Reporting Requirements

Key outputs Consumer experience measures

Covering:
Unwanted telephone contacts
Avoidable written complaints

Key outputs

Consumer experience measures

- **Unwanted telephone contacts**
The number of unwanted telephone contacts received during the report year.
- **Avoidable written complaints**
The number of avoidable written complaints received during the report year.

These are new measures to be piloted by all companies from 1 April 2008, with the intention that this information will form part of Ofwat's quantitative measure of consumer experience from April 2010 (ie once the pilot has refined the reporting requirements). See RD04/08 for further information about the development of consumer experience measures.

Lines 1-8 – Unwanted telephone contacts

Aim

Companies receive a variety of types of telephone contact. Some of these can be defined as 'wanted' for example, when the caller wants to pay their bill or is providing information (eg change of address) or is seeking information (eg requesting a leaflet). 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 (leakage, low pressure, flooding) or to chase up where the company has not done what they previously promised within promised timescales.

This new measure identifies (in line 3) the total number of unwanted telephone contacts received during the year which will be used in the quantitative measure of consumer experience. The remaining lines are provided to derive and explain the data reported in line 3.

Common definitions

Consumers

Any domestic or non-domestic user of water and sewerage services, including account holders. This definition is intentionally wider than 'customer' (ie account holder) to ensure all contacts are captured. Consumer includes a consumer's representative (eg CCWater, Citizens' Advice Bureau, solicitor).

Telephone contacts

Companies should report all consumer contacts to all telephone lines whilst open. We expect that companies are able to demonstrate to their Reporters that they report all consumer calls to all telephone lines whilst the lines are open.

This includes all telephone calls to **all** contact points (including telephone points used by the company's contractors where they represent a principal contact point with the company) which can be logged by company monitoring equipment.

We expect that this will be the same as telephone contacts received on principal advertised lines (table 5 line 13 minus table 5 line 15) **plus** out of hours operational and emergency calls.

Wanted telephone contacts

Any telephone contact from a consumer on subjects that are wholly positive (for example to make a payment; provide basic account information such as change of occupier; or requests

for information such as a leaflet or an application form). A detailed definition is provided below.

Unwanted telephone contacts

Any unwanted telephone contact received from a consumer. That is, a contact about events/actions that have caused unnecessary aggravation (however mild) on/to the consumer, 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 below. A repeat or chase call should be reported as an unwanted contact.

Repeat or chase call

This covers any call where a consumer has needed to chase the company (or contact the company again) in relation to the same event/query that a consumer has already been in contact with the company about. Examples of repeat or chase calls include:

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

Wanted telephone contacts

The following call subjects are considered to be positive contacts and therefore should be reported in line 2 as wanted contacts. For ease these are listed under the high-level unwanted subject headings that apply to lines 4 to 8 (eg charging/billing, water operations). Contacts that relate to one of these wanted categories but are a repeat or chase call should be reported as an unwanted contact (and reported in lines 4 to 8) and not included in line 2.

To ease regulatory burden, companies should continue to use their internal telephone contact codes when categorising telephone contacts. Codes that can be clearly and demonstrably mapped to one of the below wanted categories (subject to them not being a repeat or chase call) should be reported in line 2. For codes that cannot be clearly and demonstrably mapped to a wanted category these should be reported in lines 4 to 8 as an unwanted telephone contact.

Companies should be able to justify to Ofwat and their reporter that the codes that have been used for reporting line 2 relate to the definitions below. Reporters will be asked to check all contact codes to ensure they have been mapped to the table lines following the reporting requirements.

Telephone contact subjects reportable in line 2 – wanted telephone contacts

Charging/billing

- Information request/advice (for example, requesting an application form or a leaflet);
- Consumer making a payment;
- Consumer providing a routine meter reading;
- Consumer requesting a change to payment arrangements or their account details;
- Consumer informing the company for the first time that they are moving house;
- Where the consumer has been referred to another company (ie where the consumer has contacted the wrong company);
- Consumer calling to make a payment or set up a payment arrangement following debt recovery action undertaken by the company; and

- Where a consumer calls the company to arrange/alter/cancel an appointment.

Water ops

- Information request/advice (for example, requesting an application form or a leaflet);
- Where the consumer has been referred to another company (ie where the consumer has contacted the wrong company);
- Consumers calling to request: a new connection; disconnection; reconnection (where the company disconnected in error any request for a reconnection should be recorded as unwanted contacts); or use of a hydrant;
- Consumers calling at the company's request as part of a managed process, for example, as part of a new connection. For the avoidance of doubt calls such as those to a leakline should be reported as unwanted since they relate to a service failure; and
- Where a consumer calls the company to arrange/alter/cancel an appointment.

Waste water ops

- Information request/advice (for example, requesting an application form or a leaflet);
- Where the consumer has been referred to another company (ie where the consumer has contacted the wrong company);
- Consumers calling to request: a new connection; disconnection; or reconnection (where the company disconnected in error any request for a reconnection should be recorded as unwanted contacts);
- Consumers calling at the company's request as part of a managed process, for example, as part of a new connection. For the avoidance of doubt calls such as those in connection to a sewer flooding incident should be reported as unwanted since they relate to a service failure; and
- Where a consumer calls the company to arrange/alter/cancel an appointment.

Metering

- Information request/advice (for example, requesting an application form or a leaflet);
- Enquiries about and applications for optional metering;
- Where the consumer has been referred to another company (ie where the consumer has contacted the wrong company);
- Consumers calling at the company's request as part of a managed process, for example, as part of a meter application. For the avoidance of doubt calls such as those in connection to a faulty meter should be reported as unwanted since they relate to a service failure; and
- Where a consumer calls the company to arrange/alter/cancel an appointment.

Other

- Information request/advice (for example, requesting an application form or a leaflet);
- Water efficiency information and product requests;
- 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, angling etc;
- Where the consumer has been referred to another company (ie where the consumer has contacted the wrong company);
- Requests for plumbing/insurance services (eg Homeserve); and
- Where a consumer calls the company to arrange/alter/cancel an appointment.

Guidance

The flow chart below illustrates how companies should sift telephone contacts in order to determine whether they are reported as a wanted or unwanted contact. Companies should use this methodology to assist them in their categorisation decisions.

The rationale behind the flowchart can be found in appendix 1 to this chapter. (This is provided as background information and will eventually be removed from the reporting requirements).

Companies should report the number of wanted telephone contacts in line 2.

Line 3 – Total unwanted telephone contacts should equal the sum of lines 4-8.

Companies should report the number of unwanted telephone contacts (including chase or repeat contacts) against one of the following 5 categories:

- Charging and billing issues (line 4);
- Water service issues (line 5);
- Waste water service issues (line 6);
- Metering issues (line 7); and
- Other issues (line 8)

Companies should use the category list in table 5A to help them decide under which category to report the telephone contact.

For ease of reporting we expect that existing company contact codes are mapped on to this approach (similar to the approach used for Table 5a). We wish to avoid setting industry standard contact codes. The pilot will explore the practicalities of this approach.

Reporting telephone contacts received on behalf another company which relate to the other company's policies and procedures:

Where companies bill on behalf of other companies the guiding principle is that the contact should be reported by the company that deals with it.

Reporting telephone contacts to/about contractors:

Telephone contacts *to* contractors or other agents about work being undertaken on behalf of the company **must** be reported, 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, instead of dealing with it in-house.

Maintaining audit trails:

There **must** be an auditable record of where and how a company has determined what contacts are reported as wanted or unwanted. This will enable the reporter to audit the contacts and to come to a view on the robustness of the company's data.

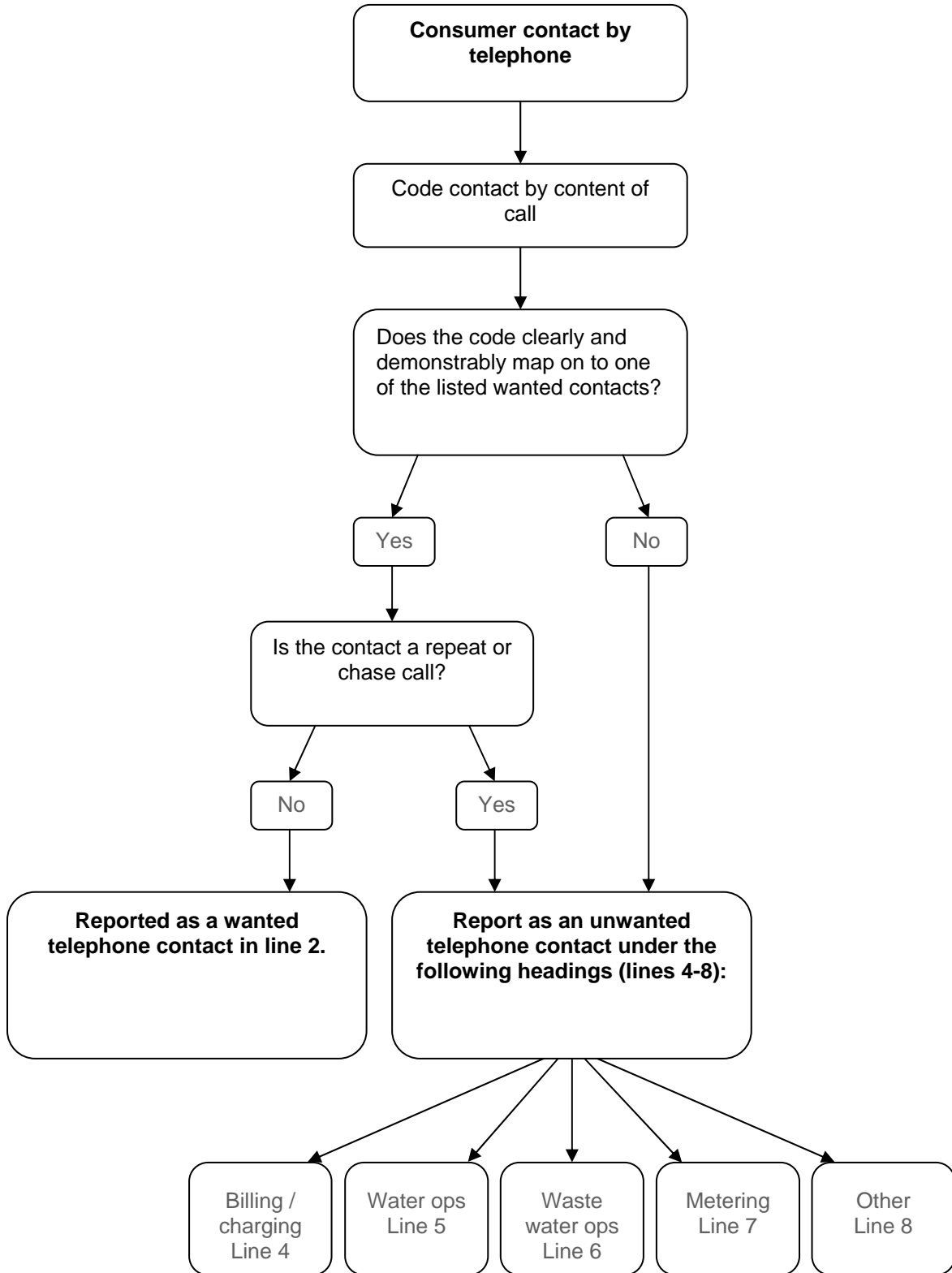
Sampling:

Where the information for this table is derived from a sample basis the company **must** explain:

- the justification for using a sampling method rather than counting actuals; and
- the sampling method used by the company including how the sample is selected, the size of the sample and how robust it is.

Assumptions:

Any assumptions used by the company **must** be clearly stated in the methodology statement (see appendix 2 in this chapter).



Company commentary

The company should:

- describe the methodology used to determine/classify whether telephone contacts are reportable as wanted or unwanted and confirm (or otherwise) whether the company have followed the flowchart above;
- provide justification for why each telephone contact code relates to one of the wanted or unwanted subject headings. For codes that cannot be clearly and demonstrably mapped to a wanted subject heading, the data should be reported as an unwanted telephone contact by default;
- describe the methodology used to determine how a telephone contact is a repeat or chase call and how the repeat or chase call is recorded;
- describe the systems used to report the breakdown of telephone contacts;
- state any assumptions made in reporting figures and where potential data weakness lie;
- comment on any matter which might have an influence on the reported figures;
- comment on any areas of the reporting requirements which are not met providing an explanation why;
- highlight any ongoing work that may significantly change the volume or robustness of data going forwards;
- state any sampling method used by the company including how the sample is selected, the size of the sample and how robust it is, and the justification for using a sampling method rather than counting actuals;
- provide justification for the confidence grade assigned to each line. Confidence grades should take account of any areas where the company does not meet the reporting requirements;
- provide details of any assumptions that have been used;
- confirm that the sum of lines 4 to 8 equals line 3, and that the sum of line 2 and 3 equals line 1. Where this is not the case, companies should justify this to their reporter and provide an explanation in their commentary; and
- confirm that line 1 equals total calls received (BN1668) minus the number of calls abandoned (BN1684) as reported in table 5 plus out of hours operational and emergency calls. Where this is not the case, companies should justify this to their reporter and provide an explanation in their commentary.

Methodology statement

The methodology statement should clearly describe and explain the methods and procedures adopted in order to report the number of wanted and unwanted telephone contacts. It should follow the layout given in appendix 2.

In particular companies should:

- explain how wanted telephone contacts are identified and allocated to line 2;
- explain how unwanted telephone contacts are identified and allocated to the 5 unwanted categories;
- state any assumptions or sampling approaches used;
- describe the methodology used to determine/classify whether telephone contacts are reportable as wanted or unwanted and confirm (or otherwise) whether the company have followed the flowchart above;
- describe the methodology used to determine how a telephone contact is a repeat or chase call and how the repeat or chase call is recorded; and
- describe the systems used to report the number of wanted or unwanted telephone contacts.

Guidance to Reporters

The Reporter should:

- confirm or otherwise that all methods used by the company are as the company has described;
- confirm or otherwise that any telephone contacts classed as wanted (line 2) have been done in accordance with these reporting requirements – namely that all wanted company contact codes are clearly and demonstrably mapped to one of the wanted subject headings;
- confirm or otherwise the robustness of company methods and systems to breakdown unwanted contacts (line 3) into lines 4 to 8;
- confirm or otherwise the robustness of companies methods and systems to monitor and code repeat or chase calls and that these have been reported as unwanted contacts;
- comment on any area/policy that does not meet the reporting requirements;
- confirm that the company has disclosed all assumptions;
- comment on the methods used by the company, and in particular:
 - the reporter should look carefully at any sampling techniques used by the company, that all circumstances where sampling is used and all weaknesses have been exposed by the company;
 - whether the company's internal coding of telephone contacts robustly allows the identification of wanted or unwanted contacts;
 - how the company determines whether or not excluded telephone contacts are repeat or chase calls and the level of robustness that can be applied;
 - whether the company's system of tracking telephone contacts from initial receipt to classifying as an unwanted contact:
 - is robust;
 - conforms with the guidance;
 - is consistent with the flowchart above.
- confirm confidence grades assigned by company reflect the methods that they apply;
- describe in detail the checks that the reporter has carried out in order to be able to confirm and comment on each of the points set out above. Including for example how the reporter has selected any samples for audit from the full sample; quantity sampled; robustness of sample; materiality of assumptions and any weaknesses; discussions held with company staff;
- confirm that the sum of lines 4 to 8 equals line 3, and that the sum of line 2 and 3 equals line 1 (total calls received (BN1668) minus the number of calls abandoned (BN1684) as reported in table 5) plus out of hours operational and emergency calls. Where this is not the case the reporter should confirm or otherwise the company explanation in its commentary; and
- confirm or otherwise that the company has reported all contacts to all telephone lines in lines 2 and 3.

Lines 9-16 – Avoidable written complaints

Aim

To identify the total number of avoidable written complaints received during the year.

Common definitions

Written complaints

The source data for written complaints is the same as reflected in table 5 line 1 (BN200).

Avoidable written complaints

An 'avoidable' complaint is where a consumer or a consumer representative (eg CCWater, Citizens' Advice Bureau, solicitor) has complained to the company in writing as a result of the action or inaction of the company. This would manifest when the company has:

- Failed to carry out/complete an instruction agreed with/taken from the consumer or consumer representative at the first time of asking;
- Not completed an action as agreed with or expected by a consumer;
- Undertaken an inappropriate action;
- Not taken appropriate action; and/or
- Undertaken an action but not in the correct timescales.

Exclusions

Please note – these exclusions can only apply at test 2 as shown in the flowchart below. Companies can exclude from the reported figures those complaints that are:

1. Areas that are outside company control:
 - Exceptional/severe weather related events covered by the Guaranteed Standards Scheme (GSS) (this should be consistent with table 6 – Customer service standards (GSS));
 - Events that are the responsibility of a third party (eg another utility or local authority);
 - Events that relate to industrial action; and
 - Areas that are outside the remit of the company:
 - Private supplies and drainage;
 - Ground water seepage;
 - Resale as defined in Ofwat's Water Resale Order 2006; and
 - Private appliances and supply pipes.
2. Outside of regulated business (non-appointed businesses):
 - Plumbing services (eg Homeserve);
 - 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, angling etc; and
 - Other companies in group.
3. Regulatory / statutory requirements (but not company's individual policies that have had regulatory approval) for example:
 - the company's entitlement under the Water Industry Act 1999 to charge consumers according to the Rateable Values (RV); and
 - the company's entitlement under the Water Industry (Prescribed Conditions) Regulations 1999 to compulsorily meter a property.

Companies should report the volume of written complaints which have been excluded in line 10.

Guidance

The flow chart below illustrates how companies will be required to sift written complaints in order to determine whether or not they should be reported as an avoidable complaint in lines 12-16. Companies should use this methodology to assist them in their categorisation decisions. The rationale behind the flowchart can be found in appendix 1 to this chapter. (This is provided as background information and will eventually be removed from the reporting requirements).

Line 11 – Total avoidable written complaints should equal the sum of lines 12-16.

Companies should report the number of avoidable written complaints against one of the following 5 categories:

- Charging and billing issues (line 12);
- Water service issues (line 13);
- Waste water service issues (line 14);
- Metering issues (line 15); and
- Other issues (line 16).

Companies should use the category list in table 5A to help them decide under which category to report the written complaint.

Companies should report the number of written complaints that have been excluded in line 10.

Deciding whether the written complaint is as a result of the company's action or inaction (test 1)

It may not be immediately discernable whether a complaint is a result of the company's action or inaction (test 1) and further investigation may be required. Companies should categorise if a written complaint is avoidable or not when the complaint is closed (ie when a substantive response has been sent from the company) as they will be able to make a reasonable and objective assessment as to whether the complaint was as a result of the company's action or inaction. As the complaint is in written form the company will also be in a position to review the correspondence to decide whether the complaint is avoidable or not. If in doubt, the guiding principle is that companies should include the complaint as an avoidable complaint (subject to test 2, if appropriate).

Care should be taken to ensure that undercounting or double counting does not occur. Companies **must** state in their methodology statement the approach they have adopted.

Reporting written complaints received on behalf of another company which relate to the other company's policies and procedures:

Where companies bill on behalf of other companies the guiding principle is that the complaint should be reported by the company that responds.

Reporting written complaints to/about contractors:

Complaints *to* contractors or other agents about work being undertaken on behalf of the company **must** be reported, even if the contractor or agent deals directly with the complaint. This would include where a company outsources part of its operations, such as debt recovery, instead of dealing with it in-house.

Complaints *about* contractors or other agents **must** also be reported, even if the complaint is referred to the contractor to resolve.

Maintaining audit trails:

There **must** be an auditable record of where and how a company has determined what written complaints are reported as an avoidable complaint and what are excluded. This will enable the reporter to audit the contacts that have been excluded and to come to a view on the robustness of the company's data.

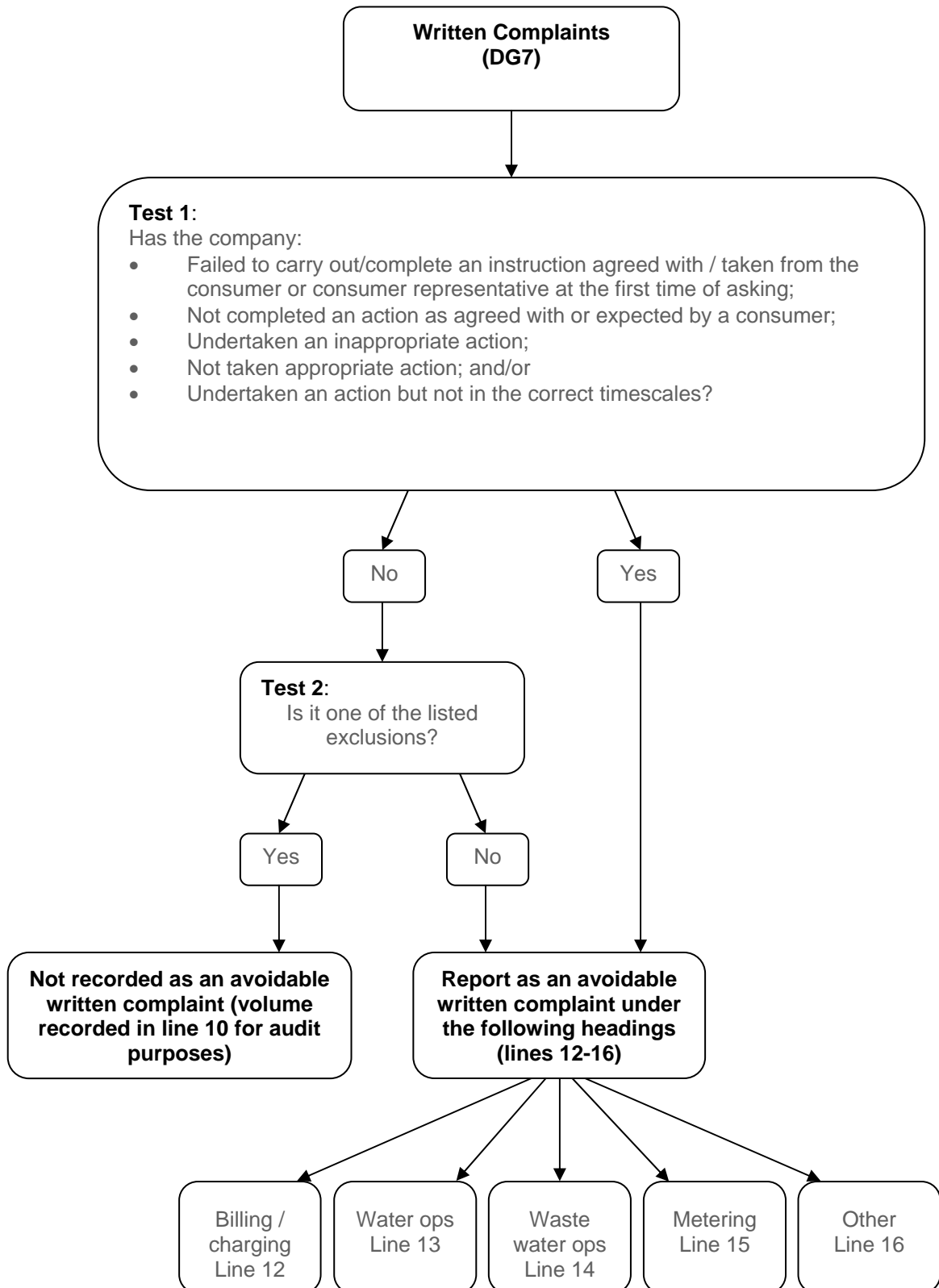
Sampling:

Where the information for this table is derived from a sample basis the company **must** explain:

- the justification for using a sampling method rather than counting actuals; and
- the sampling method used by the company including how the sample is selected, the size of the sample and how robust it is.

Assumptions:

Any assumptions used by the company **must** be clearly stated in the methodology statement.



Company commentary

The company should:

- describe the methodology used to determine/classify whether written complaints are reportable as avoidable written complaints and confirm (or otherwise) whether the company has followed the flowchart above;
- describe the systems used to report the number of avoidable written complaints;
- state any assumptions made in reported figures and where potential data weakness lie;
- comment on any matter which might have an influence on the reported figures;
- comment on any areas of the reporting requirements which are not met providing an explanation why;
- highlight any ongoing work that may significantly change the volume or robustness of data going forwards;
- state any sampling method used by the company including how the sample is selected, the size of the sample and how robust it is, and the justification for using a sampling method rather than counting actuals;
- provide justification for the confidence grade assigned to each line. Confidence grades should take account of any areas where the companies does not meet the reporting requirements;
- provide details of any assumptions that have been used;
- confirm that the sum of lines 12-16 equals line 11 (companies should provide an explanation where this is not the case); and
- confirm that line 11 plus line 10 equals line 9 (total written complaints received (BN200) as reported in table 5). Companies should provide an explanation where this is not the case.

Methodology statement

The methodology statement should clearly describe and explain the methods and procedures adopted in order to report the number of avoidable written complaints. It should follow the layout given in appendix 2.

In particular companies should:

- explain how avoidable written complaints are identified and allocated to the 5 categories;
- state any assumptions or sampling approaches used;
- describe the methodology used to determine/classify whether written complaints are reportable as avoidable written complaints and confirm (or otherwise) whether the company have followed the flowchart above; and
- describe the systems used to report the number of avoidable complaints.

Guidance to Reporters

The Reporter should:

- confirm or otherwise that all methods used by the company are as company has described;
- confirm or otherwise that any written complaints that have been excluded (line 10) have been done in accordance with these reporting requirements;
- comment on any area/policy that does not meet the reporting requirements;
- confirm that the company has disclosed all assumptions;
- comment on the methods used by the company, and in particular:
 - the reporter should look carefully at any sampling techniques used by the company, that all circumstances where sampling is used and all weaknesses have been exposed by the company;

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- the methods used to determine whether a written complaint is not due to the companies action/inaction (test 1);
- the methods used to determine whether a written complaint is excluded (test 2);
- whether the company's system of tracking written consumer complaints from the initial communication through to avoidable complaint:
 - is robust;
 - conforms with the guidance;
 - is consistent with the Ofwat produced flowcharts.
- confirm confidence grade assigned by company reflect the methods that they apply;
- confirm that the sum of lines 12-16 equals line 11 and that line 11 plus line 10 equals line 9 (the total written complaints received (BN200) as reported in table 5). Where this is not the case the reporter should confirm or otherwise the company explanation in the commentary; and
- describe in detail the checks that the reporter has carried out in order to be able to confirm and comment on each of the points set out above. Including for example how the reporter has selected any samples for audit from the full sample; quantity sampled; robustness of sample; materiality of assumptions and any weaknesses; discussions held with company staff.

Reporting requirement line definitions

A UNWANTED TELEPHONE CONTACTS

1	Total calls answered on customer contact lines (which are not later abandoned) including out of hours operational and emergency calls	nr	0dp
Definition	This covers all telephone calls to all contact points (including telephone points used by the company's contractors where they represent a principal customer contact point with the company) which can be logged by company monitoring equipment. Calls answered is defined as the number of calls which are answered by an agent or automated system where the customer completes the transaction (i.e. abandoned calls will not be included in this line). Calls which receive an engaged tone are to be excluded from this line. This will be the same as telephone contacts received on principal advertised lines (table 5 line 13 (BN1684) minus table 5 line 15 (BN1684)) plus out of hours operational and emergency calls.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input ((table 5 line 13 minus table 5 line 15) plus out of hours operational and emergency calls)		
Reference			
Responsibility	Service and Performance Team		

2	Wanted telephone contacts	nr	0dp
Definition	Number of wanted telephone contacts		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input (sum of lines 2 and 3 is expected to equal line 1)		
Reference			
Responsibility	Service and Performance Team		

3	Total unwanted telephone contacts	nr	0dp
Definition	Number of unwanted telephone contacts		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input (sum of lines 4 to 8)		
Reference			
Responsibility	Service and Performance Team		

4	Unwanted telephone contacts – charging / billing	nr	0dp
Definition	Number of unwanted telephone contacts relating to charging / billing (including repeat and chase calls).		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

5	Unwanted telephone contacts – water operations	nr	0dp
Definition	Number of unwanted telephone contacts relating to water operations (including repeat and chase calls).		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

6	Unwanted telephone contacts - waste water operations	nr	0dp
Definition	Number of unwanted telephone contacts relating to waste water operations (including repeat and chase calls).		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

7	Unwanted telephone contacts - metering	nr	0dp
Definition	Number of unwanted telephone contacts relating to metering (including repeat and chase calls).		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

8	Unwanted telephone contacts – other	nr	0dp
Definition	Number of unwanted telephone contacts that cannot be categorised as relating to charging / billing, water operations, waste water operations, or metering (including repeat and chase calls).		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

B AVOIDABLE WRITTEN COMPLAINTS

9	Total written complaints	nr	0dp
Definition	DG7: Response to written complaints; total – Total number of written complaints received by company		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Copied table 5 line 1		
Reference			
Responsibility	Service and Performance Team		

10	Written complaints - exclusions	nr	0dp
Definition	Number of written complaints that have been excluded.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

11	Total avoidable written complaints	nr	0dp
Definition	Number of complaints which are avoidable		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input (sum of lines 12 – 16)		
Reference			
Responsibility	Service and Performance Team		

12	Avoidable written complaints – billing / charging	nr	0dp
Definition	Number of avoidable written complaints that relate to charging / billing.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

13	Avoidable written complaints – water operations	nr	0dp
Definition	Number of avoidable written complaints that relate to water operations.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

14	Avoidable written complaints – waste water operations	nr	0dp
Definition	Number of avoidable written complaints that relate to waste water operations.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

15	Avoidable written complaints – metering	nr	0dp
Definition	Number of avoidable written complaints that relate to metering.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

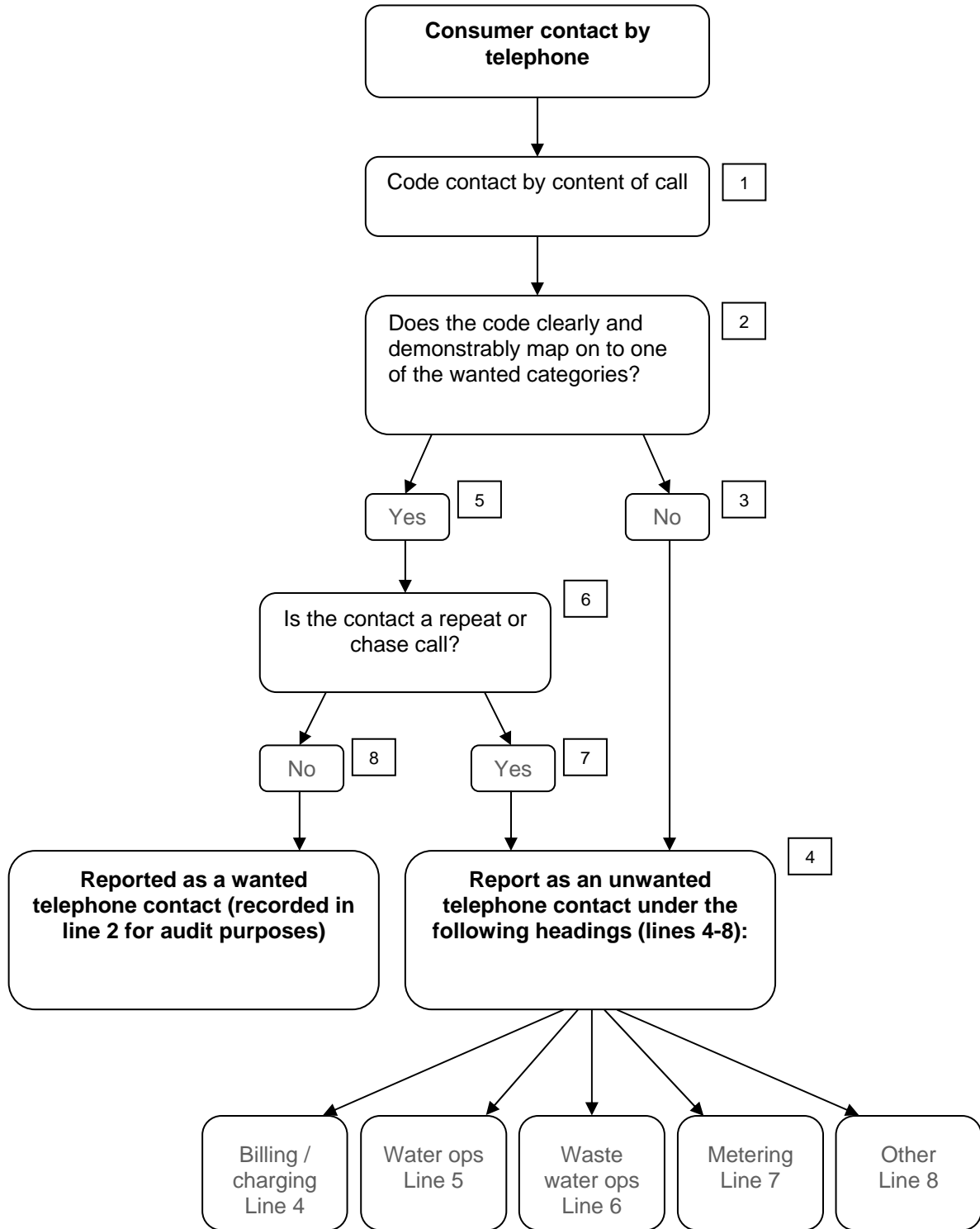
16	Avoidable written complaints – other	nr	0dp
Definition	Number of avoidable written complaints that cannot be categorised as relating to charging / billing, water operations, waste water operations, or metering.		
Primary Purpose	Confirming delivery of key outputs and service		
Processing rule	Input		
Reference			
Responsibility	Service and Performance Team		

CHANGE CONTROL SHEET

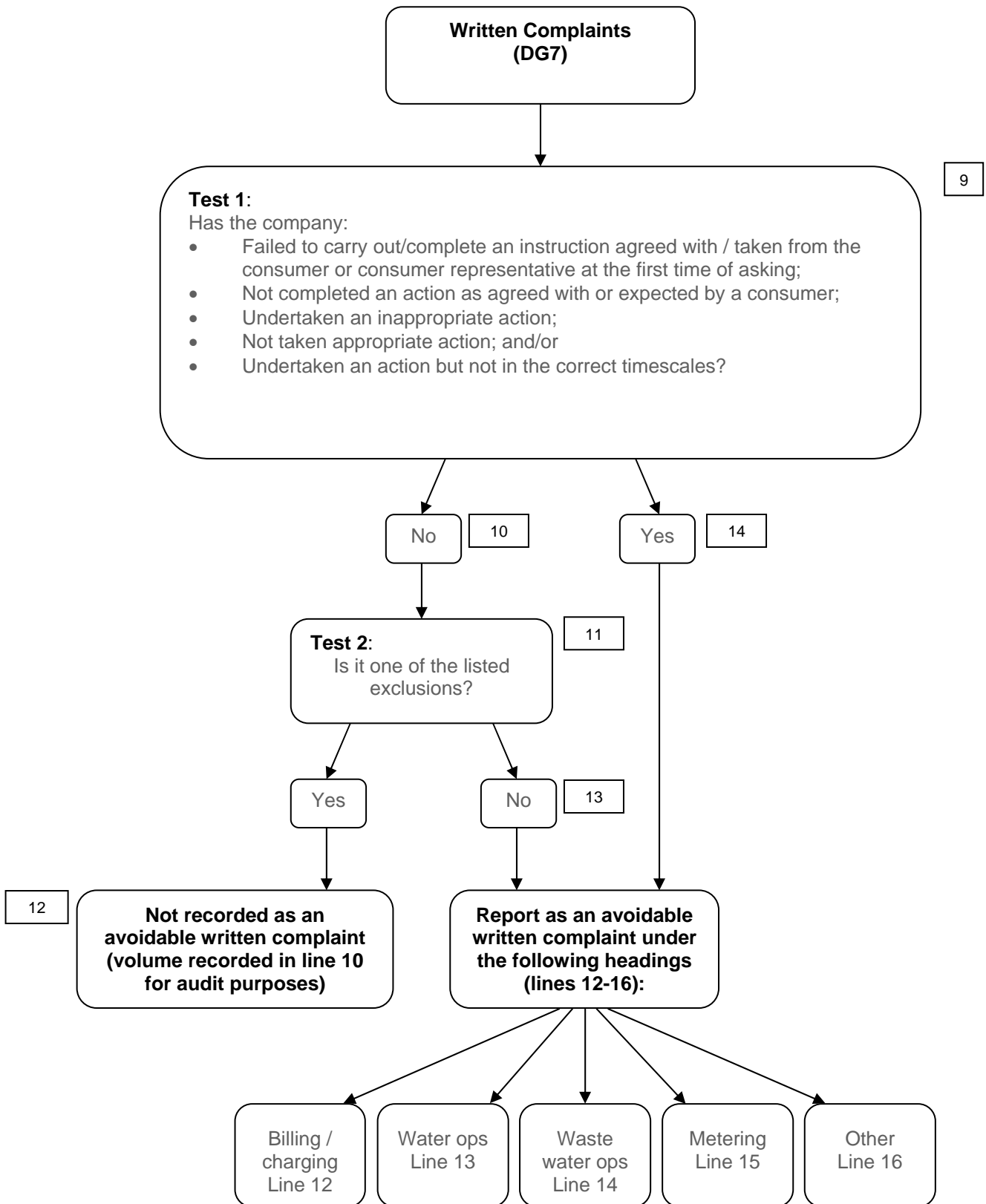
Consumer experience measures

April 2008	First Draft

Appendix 1: Flowchart rationale – Telephone contacts



Flowchart rationale- Written Complaints



Rationale behind the flowcharts

Overall rationale

The overall rationale is that all contacts / complaints should be reported unless specifically excluded. This approach removes most of the subjective judgement that may be required by company staff. It is also easier to audit as reporter's will only be required to audit those contacts which have been excluded. Exclusions will only be allowed where robust and auditable evidence is available.

Moving through the flowchart – Telephone contacts

(1) – Companies should continue to code their telephone contacts using their existing methodology/systems.

(2) – Contacts / codes that can clearly and demonstrably map on to one of the defined list of wanted contacts will be reported in line 2. The reporter will audit those contacts which companies have been classed in this way.

(3) – Those contacts that are not wanted will be reportable as telephone contacts which are unwanted. These contacts will be sub classified by broad subject area (4).

Those contacts that have been counted as wanted due to their content (5) will then undergo an assessment of whether or not they are a repeat or chase contact (6). This is because consumers will experience unnecessary aggravation if they have to further contact the company regarding a subject that was initially not vexatious (e.g. "I phoned you up to request a leaflet on water resources but I've waited two weeks and it's not arrived."). Such cases must be reported as unwanted (7). First time contacts will not be reportable as an unwanted telephone contact (8).

Moving through the flowchart – Written complaints

(9) - This first test is designed to assess whether the written complaint is due to the company's action or inaction. It looks at 'how' (or the manner in which) the company has dealt with the subject that is being complained about¹. For example, has the company failed to do something? Has the company done something it shouldn't? Has the company been late doing something?

(10) - If the answer to the first test is 'no' (the complaint is not as a result of the company's inaction of action) then the complaint moves to the second test (11) - Is the subject of the complaint listed as an exclusion? This test assesses the 'subject' of the complaint. If the subject of the complaint is exempt (i.e. there is an exclusion) the complaint is not reported as an avoidable complaint, for example, if the complaint is about sewer flooding as a result of extreme / severe weather or about water resale (12).

Companies are required to collect and report on the volume of excluded contacts for audit purposes (line 10).

² It may not be immediately discernable whether a complaint is a result of the company's action or inaction and further investigation may be required. Companies should categorise if a written complaint is avoidable or not when the complaint is closed (i.e. when a substantive response has been sent to the company) as they will be able to make a reasonable and objective assessment as to whether the complaint was as a result of the company's action or inaction. As the complaint is in written form the company will be in a position to review the correspondence to decide whether the complaint is avoidable or not. If in doubt, the guiding principle is that companies should include the complaint as an avoidable complaint (subject to test 2, if appropriate).

Where there are no exclusions, the complaint should be reported as an avoidable complaint (13). This broadly assumes that all complaints which are not exempt or as a result of the company's action / inaction should be reported as an avoidable complaint. Whilst this might appear to unduly penalise, as stated above, this starts from the position that all complaints should be reported unless covered by an exemption. It removes any subjective judgement required by company staff.

If the answer to the first test is 'yes' then the complaint should be regarded as an 'avoidable complaint' (14). The contact does not pass through the second test (exclusions) because regardless of what the complaint is about (whether it's an excludable subject or not) if the company has taken an action or failed to take an action which has led to the consumer contacting the company this should be classed as an avoidable complaint. For example, if the consumer contacted the company about a severe weather event (which might ordinarily be excluded) but the company failed to do something or didn't handle the contact to the consumer's expectation this should be reported as an avoidable complaint (i.e. it covers how the company handled the contact not what it was about).

Examples

Example 1 – Consumer telephones their company and states "I have no water"

As this contact is unwanted (3) and does not relate to any of the wanted categories the contact should be reported as an unwanted contact (4).

Example 2 – "I'm phoning to request an application form for a water meter"

This is coded as an information request (1). Information requests are "wanted" (2) and therefore should be reported as such (5). This is a first contact (6) so the contact is reported as a wanted telephone contact (8).

Example 3 – "I phoned two weeks ago for an application form for a water meter but you have not sent me one"

As this contact is a repeat / chase call (7) it should be reported as an unwanted contact (4) despite the contact being about a contact that would ordinarily be "wanted" (see example 2 above).

Example 4 – Consumer writes to their company during a period of extreme weather and states: "I have been flooded by sewage" which on investigation was confirmed to be related to exceptional weather and therefore exempt from GSS payment and this measure.

At test 1 (9), if the flooding was due to exceptional weather it is not likely to be due to the company's action/inaction (10). It therefore moves to the second test (11). If the event is due to exceptional weather (and is covered by the GSS) it is exempt and so will not be reported as an avoidable complaint (12).

Appendix 2: Methodology statement

Guidance to companies

The company should clearly describe and explain the methods and procedures adopted in order to monitor and report on the level of unwanted telephone contacts and avoidable written complaints. It **must** follow the layout given below. Companies should include any copies of formal written procedures or guidance as additions not instead of the requested format.

The methodology statement should be a clear, concise explanation of the process involved in producing the reported information. It should include an explanation of the source of any measurements, description of company specific systems and details of the coverage achieved by various monitoring systems, including the extent of any projection or extrapolation required in arriving at the reported figures. Any assumptions made by the company in reporting this information must be disclosed. (A description, for example, of a company's computer system or the method used to transfer numbers from spreadsheets to the June return table is not sufficient).

The following is the layout for the company's Methodology Statement.

Unwanted telephone contacts

- **Methodology and procedures**
 - Unwanted telephone contacts
 - Include details of how the methodology the company has been used to classify / determine whether a telephone contact is wanted or unwanted.
 - Include details of how the company determines whether or not a wanted contact is a repeat or chase call
 - Confirm whether the company has followed the flowchart shown in the reporting requirements.
- **Definitions**
 - Include any definitions the company has used to report the data in the table.
- **Exclusions**
 - Provide details of how internal codes are used to determine contacts that are wanted or unwanted (5 categories).
- **Auditing**
 - Include internal procedures/guidance covering the reporting of unwanted telephone contacts. Also provide details of the checks/audits carried out to ensure that contacts are correctly classified as wanted or unwanted contacts or otherwise.
- **Sources of information**
 - System used
 - Include details of all systems used for recording and reporting wanted and unwanted telephone contacts.
 - Actual data
 - Include whether actual data is used to report the data in lines 1-8.
 - Sampling
 - Provide details of any sampling used to report lines 1-8.
 - Justification for sampling
 - Provide justification for using sampling rather than counting actuals.
 - Sampling methodology
 - Provide details of the methodology used for sampling.
 - Reliability and validity of results
 - How do you ensure that figures are reliable and valid?
- **Assumptions**
 - Assumptions used by the company should be clearly disclosed.
- **Other issues**
 - Provide any further information on issues that have arisen in the report year that impact on your methodology for reporting in the June return.

Avoidable written complaints

- **Methodology and procedures**
 - Classification of avoidable written complaints
 - Include details of how the methodology the company has used to classify / determine whether a contact is avoidable complaint.
 - Confirm whether the company has followed the flowchart shown in the reporting requirements.
- **Definitions**
 - Include any definitions the company has used to report the data in the table.
- **Exclusions**
 - Provide details of contacts that are excluded (test 2).
- **Auditing**
 - Include internal procedures/guidance covering the reporting of avoidable written complaints. Also provide details of the checks/audits carried out to ensure that written complaints are correctly classified as avoidable or unavoidable.
- **Sources of information**
 - System used
 - Include details of all systems used for recording and reporting avoidable written complaints.
 - Actual data
 - Include whether actual data is used to report the data in lines 9-16.
 - Sampling
 - Provide details of any sampling used to report lines 9-16.
 - Justification for sampling
 - Provide justification for using sampling rather than counting actuals.
 - Sampling methodology
 - Provide details of the methodology used for sampling.
 - Reliability and validity of results
 - How do you ensure that figures are reliable and valid?
- **Assumptions**
 - Assumptions used by the company should be clearly disclosed.
- **Other issues**
 - Provide any further information on issues that have arisen in the report year that impact on your methodology for reporting in the June return.