

# Chapter 5a

## Key outputs

### DG7 Response to written complaints

Complaints data for the Consumer Council for  
Northern Ireland

## Chapter 5a

# Customer Complaints

### Guidance

Written complaints should be reported in total and against one of five broad categories as listed below:

- Charging and billing issues;
- Water service issues;
- Sewerage service issues;
- Metering issues; and
- Other service issues or activities.

A list of what complaint type should be allocated to which category is set out at the end of this guidance. This list was updated following the discussions held by Water UK in early 2007.

In England and Wales several companies, in their response to CCWater's consultation paper suggested that the charging and billing category should be sub-divided into measured and unmeasured charging and billing issues. CCWater consider this to be sensible but it has not been possible to accommodate this suggestion for AIR08. CCWater's current database is unable to identify whether complaints about, for example, general charging or debt recovery issues relate to measured or unmeasured accounts. CCWater are implementing a new complaint management system which will be able to identify measured and unmeasured investigated complaints. Because it will be implemented during the middle of the year, companies are asked to continue to report charging and billing complaints as a single category for AIR08. However, from April 2008 companies are asked to separate measured and unmeasured customer written complaints for billing and charging so it can be reported from AIR09 onwards.

This approach will be mirrored in Northern Ireland.

**Second stage review:** This is defined as a second complaint from a customer that, in accordance with the company's approved complaints procedure, is reviewed by a person or persons not involved in providing the response to the customer's first complaint.

Some companies operate a three stage complaints procedure. For the avoidance of doubt only complaints that reach the second stage of the company's complaints procedure are to be included in lines 5, 7, 9, 11 and 13. Complaints that enter the third stage of a company procedure should be reported in the accompanying commentary.

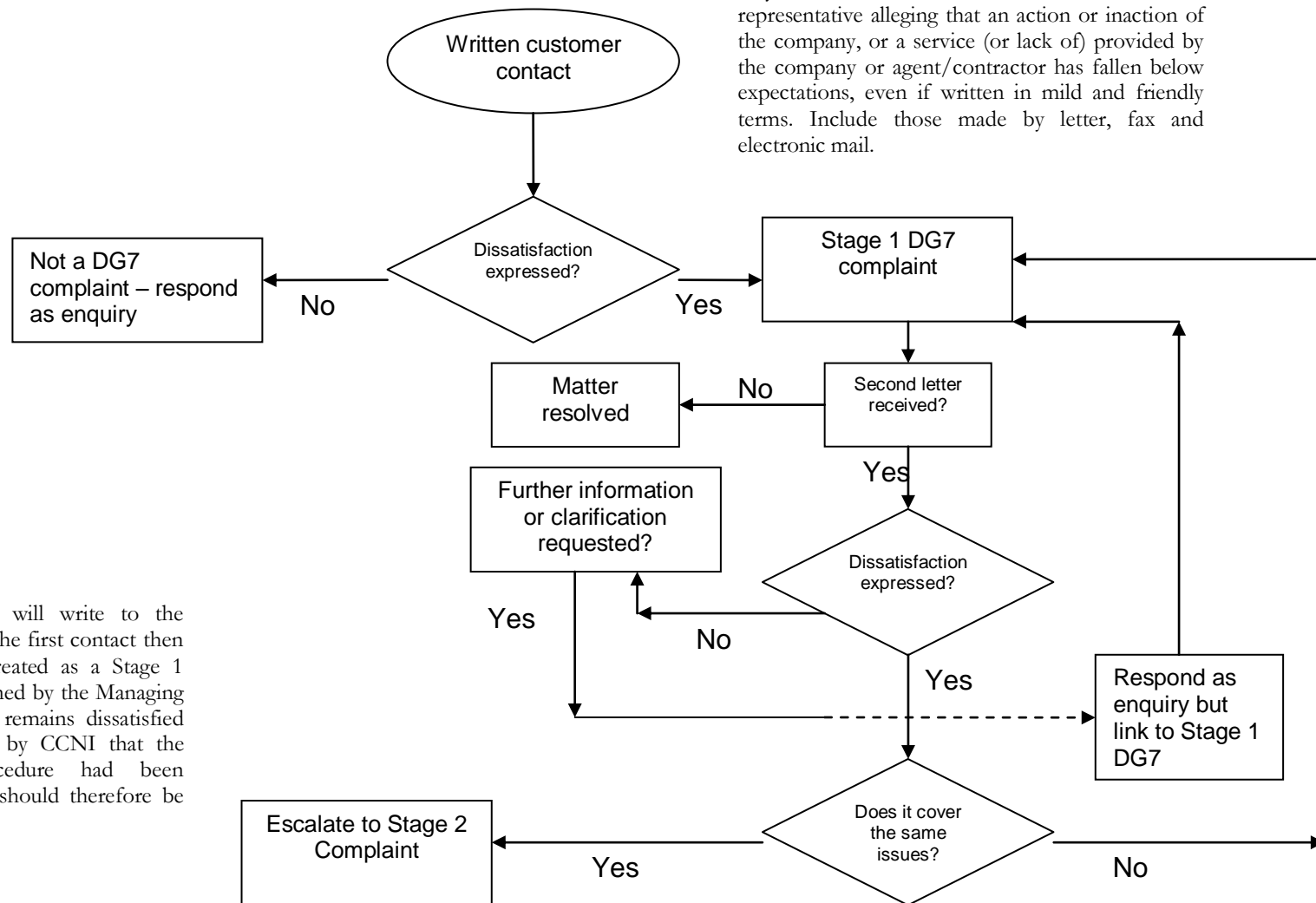
Some companies, depending on the nature of the complaint, require a senior manager rather than a customer service agent or equivalent to address the complainant's concerns when such a complaint is first received, e.g. an allegation of gross misconduct by a company employee. In such circumstances the complaint should be classed as being at the first stage of the company's complaints procedure. If the customer remains unhappy and follows up the initial complaint then this second letter is to be classed as being at the second stage review.

The flowchart below gives an outline of the initial receipt of a written complaint to the second stage review.

## Complaint Handling DG7

### Section 2 Chapter 5a

Any written communication from a customer or representative alleging that an action or inaction of the company, or a service (or lack of) provided by the company or agent/contractor has fallen below expectations, even if written in mild and friendly terms. Include those made by letter, fax and electronic mail.



In some cases, customers will write to the Managing Director. If it is the first contact then the complaint should be treated as a Stage 1 DG7. If the response is signed by the Managing Director and the customer remains dissatisfied then it would be assumed by CCNI that the company complaint procedure had been exhausted. The complaint should therefore be referred to CCNI.

## **ANNUAL INFORMATION RETURN REPORTING REQUIREMENTS 2007**

### **Chapter 5a - Guidance to Reporters**

The Reporter should:

- Confirm or otherwise that all methods used by the company are as the company has described.
- Confirm whether the company has disclosed all assumptions.
- Confirm whether the confidence grades assigned by the company reflect the methods they apply.
- Comment on the methods used by the company, and in particular:
  - Whether the company's allocation of complaints to the five complaint categories conforms to: the list of complaint types listed in the guidance (note that there is no requirement for individual company complaint descriptors to exactly match those in the guidance. But they should be broadly consistent, and it should be apparent into which of the five complaint categories they fall).
  - whether the company's system of tracking customer complaints from initial receipt to second stage review (and beyond) is:
    - robust;
    - conforms to the guidance;
    - conforms to the company's complaints procedure; and
    - consistent with the produced flowchart.
- 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. The Reporter should include, for example, how s/he has selected any samples for audit from the full population; quantity sampled; robustness of sample; materiality of assumptions and any weaknesses; discussions held with company staff.

**Complaint type and category**

Reference	Complaint type
<b>Line 4</b>	<b>Charging and Billing</b>
<b>Unmeasured bills</b>	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 CCNI jurisdiction) Assessed charge where a meter cannot be fitted Failure to receive payment book/bills/reminder Incorrect account info/failure to register customer details
<b>Measured bills</b>	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
<b>Debt Recovery</b>	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
<b>Disconnection</b>	Disconnection – adequate notification
	Disconnection – on the day arrangements
	Conditions imposed to reconnect the supply
	Disconnection/reconnection fees
<b>Infrastructure</b>	Infrastructure charges : Policy
<b>Charges</b>	Infrastructure charges : Amount
	Infrastructure charges : Disputed application
	Infrastructure charges : Other
<b>Vulnerable Groups</b>	Vulnerable customers: Policy
	Vulnerable customers: Eligibility
	Vulnerable customers: Level of charge
	Vulnerable customers: Administration of scheme
	Vulnerable customers: Other

<b>Line 6</b>	<b>Water Service</b>
<b>Restrictions</b>	Hosepipe ban – general
	Hosepipe ban – inconsistency in application
	Drought orders
<b>Interruptions to supply</b>	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
<b>Maintenance</b>	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
<b>Water Pressure</b>	High pressure/Pressure Surge
	Low Pressure - Daily Problem
	Low Pressure - Seasonal Peak Problem
	Low Pressure - Intermittent/Irregular Occurrence
	Other pressure problem
<b>Water Quality</b>	Taste
	Water odour
	Boil water notice/do not use notice/do not drink notice
	Hard Water
	Change of water
	'Animals' in water, e.g. asellus
	Brown Water Discolouration/Appearance
	Other Water Discolouration/Appearance
	Other water quality complaint
<b>Miscellaneous</b>	Other problem associated with water treatment works
	Environmental nuisance from treatment works (water)

<b>Line 8</b>	<b>Sewerage Service</b>
<b>Sewer Flooding</b>	Sewer Flooding - Internal Only
	Sewer Flooding - External Only
	Sewer Flooding internal and external
<b>Maintenance</b>	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
<b>Miscellaneous</b>	Other problem relating to sewage treatment works
	Environmental nuisance from treatment works (sewage)
	Odours from sewers
	Rat infestation of sewers



<b>Line 10</b>	<b>Metering</b>
<b>Policy</b>	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
<b>Installation</b>	Installation policy
	Installation cost (incl. co option and unavoidable DIY costs)
	Time taken to install meter by company
	Location of meter
	Quality of meter installation work by the company
<b>Miscellaneous</b>	Access/Maintenance/Replacement
	Accuracy
	Testing

<b>Line 12</b>	<b>Other service issues or activities</b>
<b>Appointments</b>	Failure to specify timed appointment (2hr window)
	Missed appointments by company representatives
<b>Complaints</b>	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
<b>Administration</b>	Other failure or delay in administration
	Attitude / behaviour of company staff
	Inability to contact appropriate company staff
	Poor advice from company
<b>Telephony</b>	Use of recorded messages
	Use of message management system
	Other complaint about company telephone system
<b>Miscellaneous</b>	Inadequate notice given by company
	Operation of published Company Charter (non statutory)
	Literature: Publications - contents of, cost & distribution

## Chapter 5a Line definitions

<b>1</b>	Total written complaints	nr	Odp
<b>Definition</b>	DG7: Response to written complaints; total - Total number of written complaints received by company		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Copied: table 5 line 1		
<b>Responsibility</b>	Comparative Efficiency & Performance Team		

<b>2</b>	Number dealt with within 10 working days	nr	Odp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints dealt with within ten working days.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Copied: table 5 line 2		
<b>Responsibility</b>	Comparative Efficiency & Performance Team		

<b>3</b>	Nr dealt with in more than 20 working days	nr	Odp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints dealt with in more than twenty working days.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Copied: table 5 line 4		
<b>Responsibility</b>	Comparative Efficiency & Performance Team		

<b>4</b>	Total written complaints about charging and billing issues	nr	Odp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about charging and billing issues.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>5</b>	Total written complaints about charging and billing issues escalated to second stage review	nr	Odp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about charging and billing issues escalated to second stage review.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>6</b>	Total written complaints about water service issues	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about water service issues.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>7</b>	Total written complaints about water service issues escalated to second stage review	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about water service issues escalated to second stage review.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>8</b>	Total written complaints about sewerage service issues	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about sewerage service issues.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>9</b>	Total written complaints about sewerage service issues escalated to second stage review	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about sewerage service issues escalated to second stage review.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service.		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>10</b>	Total written complaints about metering issues	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about metering issues		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>11</b>	Total written complaints about metering issues escalated to second stage review	nr	0dp
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<b>Definition</b>	DG7: Response to written complaints; number of written complaints about metering issues escalated to second stage review.
<b>Primary Purpose</b>	Confirming delivery of key outputs and service
<b>Processing rule</b>	Input
<b>Responsibility</b>	Consumer Council for Northern Ireland

<b>12</b>	Total written complaints about other service issues or activities.	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about other service issues or activities		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

<b>13</b>	Total written complaints about other service issues or activities escalated to second stage review	nr	0dp
<b>Definition</b>	DG7: Response to written complaints; number of written complaints about other service issues or activities escalated to second stage review.		
<b>Primary Purpose</b>	Confirming delivery of key outputs and service		
<b>Processing rule</b>	Input		
<b>Responsibility</b>	Consumer Council for Northern Ireland		

**CHANGE CONTROL SHEET**  
**CHAPTER 5a**

2008/1.0	First issue of chapter for the SBP period