

## Table 5 – Customer Service – 2

### DG7 Response to Written Complaints

#### 1. Introduction

The DG7 indicator shows the total number of written complaints received and the number dealt with within the specified time bands.

#### 2. Key findings

Criteria	RAG	Assessment
Independent review of performance and reporting	Green	Performance good. Reporting process well managed
Methodology	Green	Methodology consistent with current process, control points identified and understood
Assumptions	Green	Assumptions reasonable and appropriately applied
Source data	Green	Source data is clearly identified, complete beyond material concern, well managed through to accurate systems input
Clarity of audit trails	Green	Detailed and comprehensive audit trail to all numbers available
Confidence grades	Green	Confidence grade appropriate and rationale clearly documented
Governance	Green	Responsibilities for integrity of data and commentary clearly defined. Good evidence of engagement and of final sign-off.

- The Company report that the total volume of written complaints received has decreased. Overall the number of complaints has decreased by 5.6% or 141 complaints in real terms.
- We audited the reported data and challenged the processes on a sample basis. Except where detailed below, we consider the data reported in the table is robustly prepared using systems and process that are appropriate and in line with the reporting requirements and that are properly implemented with effective quality control and governance arrangements.

#### 3. Audit approach

To check the accuracy of the information reported, our audit consisted of an interview with the NI Water line holder, an audit of the data from the Company's systems to the final table and a review of the current methodology for data collation. This year's data has also been compared with last year's table entries.

#### 4. Company methodology

##### 4.1 Overview

To confirm the methods used by the Company are as described we performed a series of reviews and audit checks. From these checks we are content that the approach adopted is in line with NI Water's stated methodology and is accordance with the Reporting Requirements.

We have provided a summary of our findings and the Company's methodology below:

- The definition of a written compliant is aligned to that stated in the reporting guidance.
- Correspondence is opened and date stamped on the date of receipt. At this point, correspondence is allocated between various categories including correspondence relating to DG6 (billing contact) and DG7 complaints.

- All Customer contact information is managed through customer contact and billing system.
- All mail is logged on the day it is received.
- Once correspondence has been opened and indexed it can then be allocated to an Agent for action. Managers have the ability to run reports from Savvion providing a list of prioritised contacts which ensures that contacts are dealt with in line with the SLA and regulatory timescales.
- Contacts are closed when a final response is sent to the customer. We discussed with the Company various logistical points of this process including the times of collection and dispatch, resourcing issues and contingency plans to ensure all mail is dispatched on the same day a contact is closed. From these discussions we believe the practice adopted by the Company is suitable to ensure satisfactory compliance with the Reporting Requirements.

## 4.2 Reporting

The Company reports all complaints 'received' during the Report Year within Line 1. To report Lines 2 to 4 NI Water reports the number of contacts closed in the year (which have been received during the Report Year).

To report data the Company relies on data extracted from CorVu reports.

The Company advised that whilst holding responses close the contact for reporting purposes, the contact remains open on their system until a final response is issued. NI Water explained its methodology for reporting complaints received in one reporting period but not closed until the following year. We understand for AIR15, if a contact was received in the 2014/15 Report Year then this would be included Line 1 of Table 5. NI Water changed its methodology for Lines 2 – 5 in 13/14 whereby if a complaint received in 2013/14 is addressed by a holding response in the 2014/15 year the response time will be reported in AIR14. There were 70 complaints open at the end of 2014/15 and they were included in AIR15 Lines 2 – 5 according to its response of the holding letter. A remaining 3 complaints were still open in the report but were included as responded to within 10 working days. The Company states that *"These have all been reviewed to ensure that a holding response was issued within 10 working days. The closed date for these open DG7 contacts are backdated to the date on which the first holding response was issued."*

The Reporter is content that the methodology employed is materially appropriate.

## 4.3 Quality assurance

During our audit work we queried what QA controls NI Water operates on complaints received. The Company outlined the various controls in place, including the administration of their customer service contract and the checks undertaken by the Contract Office team. We believe these should help to promote good practice, help improve the reporting process and process control.

## 5. Audit findings

We found that the procedures and methodology broadly consistent to that reviewed previously.

### 5.1 Total written complaints (Line 1)

The volume of complaints has decreased by 5.6% or 141 complaints in real terms.

Decreases in 2014/15 volumes have been attributed to no major incidents and the relatively mild weather throughout the year.

## 5.2 DG7 Performance (Lines 2 to 5)

The Company has maintained a good level of performance in responding to complaints. Overall, nearly all written complaints were responded to within 10 working days and no written complaints were dealt with in more than 20 working days.

The Company's reported performance is ahead of their PC13 target (99.5%) of contacts dealt with within 10 working days.

## 5.3 Audit checks

During our audits we reviewed a sample of correspondence received by the Company during the year. This sample was chosen at random from contacts received throughout the 14/15 year. Our audit checks were designed to check the following:

- the contact has correctly been classified as DG7
- the Rapid system correctly records the incoming and response date
- there was an audit trail evident for each complaint
- the nature of the complaint (to inform table 5a)
- the response to the complaint is substantive.

In total we reviewed a sample of 20 contacts to review the criteria set out above. A summary of our audit findings are detailed below. Our audit checks covered complaints received by both post and email.

We found that the Company's approach is consistent with their stated methodologies. The complaints reviewed were correctly classified as DG7 written complaints. We reviewed the audit trail for all of the contacts selected and confirm that they were treated in line with the Reporting Requirements.

In our sample we located one DG7 item that could have been counted as a DG6 as we considered it to be a very soft complaint if one at all. This appears to demonstrate that NI Water are not looking to discount any items that they believe may be a complaint and adds a degree of confidence to the classification system.

### 5.3.1 Dating of correspondence

During our audit checks, for each compliant we satisfactorily tested the date of receipt was consistent between date stamp on the incoming correspondence and the date recorded on Rapid. We located one item that we could not verify as no date stamp was available on the incoming letter. We also located one letter that had the date stamp altered, however the correspondence was by mail and dated correctly. NI Water's procedures are that all incoming correspondence is date stamped on date of receipt, we are content that the Company recording of incoming dates is, materially appropriate. From our audit sample the two items located are both exceptions, particularly as one had no effect on the reporting of data and the other although reducing the robustness of the audit trail has not shown an error in the processing of the complaint, although we did pass comments back to NI Water in order to manage any reoccurrence.

### 5.3.2 Use of holding replies

Within previous audit checks we noted numerous instances where the Company issues holding responses to customer complaints. This effectively closes the contact for regulatory reporting but the contact remains open on the Company's system to ensure a response is issued to the customer. Our audit sample reviewed 2 holding responses of this type. We located one that had been fully satisfied but

also located an item where a holding response issued that had no further response showing on the Rapid system. The holding response sent was noted on the account as a completion. We have fed back these findings to NI Water.

### **5.3.3 Substantiveness of Responses**

Out of our sample of 20 DG7 items we confirm that with the exception of the holding response above, only one reply reviewed was not considered to be substantive. In this case a response did answer the question of a meeting being undertaken as requested but did not offer any direct solution to the complaint. On the basis of the checks undertaken we are mostly content that the Company's interpretation of a substantive response is sound.

As above we have fed the exception located back to the Company to assist its continuous improvement processes.

### **5.3.4 Dispatch**

We also questioned the Company on various logistical points of the dispatch process, including the times of collection and dispatch and resourcing issues to ensure all mail is dispatched appropriately. On the basis of these discussions we are content NI Water's approach is consistent with their stated approach and with the UR Reporting Requirements.

## **5.4 Treatment of emails**

We asked the Company to clarify the processes for email communication and found in general it is treated in the same way as written correspondence. Emails are logged, date stamped, indexed and allocated to an Agent as per the Company's methodology statement. The Company advised its procedures ensuring that all email contacts are logged on the day of receipt which is especially pertinent to emails received on non-working days or out of hours. We tested NI Water's methodology for recording the receipt date of a complaint received via email and the outcomes of these checks were satisfactory.

## **5.5 Exclusions from the DG7 indicator**

NI Water advised that they do not generally exclude any complaints. In 14/15, a total of 15 written customer complaints were excluded from DG7 reporting during 2014/15 for a variety of exclusion reasons as per the Level of Service Methodology. This is broadly stable in comparison with the number of exclusions reported in previous years.

The reporting guidance allows complaints to be excluded for a number of reasons (e.g. about non-appointed activities). Practice elsewhere also excludes contacts where they have fully exhausted the complaints process (where complaints are ongoing over a considerable period and any additional information received from the customer would not change the outcome of the complaint).

## **5.6 Postal strikes**

We questioned NI Water as to whether the mail strikes had a material impact on their operations (and performance) as they would not have received incoming mail or been able to dispatch mail on certain days. In response the Company advised that they do not believe interruptions in the postal service have had a material impact on their operations in 2014/15.

## 5.7 Complaints PPP and other contractors

The Company has implemented a process by which to collate these complaint types, and NI Water confirms that they have been not received any complaints to PPP concessionaries (or other contractors working on NI Water's behalf) in Year 2014/15.

## 5.8 Complaint reclassifications

We queried the measures the Company takes to ensure guidance on the regulatory definitions (e.g. what constitutes a billing contact and written complaint) are provided to Agents. NI Water provided a guidance document which had been recently communicated across the business detailing the regulatory requirements for the allocation of customer contact. We reviewed this document previously and concurred with the Company's interpretation of the guidance as this was largely based on the AIR reporting requirements.

Despite the controls in place to mitigate the risk of mis-classification, there is possibility that contacts may need to be reclassified as there are at all water companies in England and Wales. During our sample audit, we have seen one instance where an Agent mis-classified the stage of the complaint. We queried what controls the Company employs around the reclassification of contacts. NI Water explained that if an Agent is allocated an item from their work queue and recognises the CMS type is incorrect they are able to change the CMS code and would, if required, seek approval to transfer the item to the correct team. We reviewed a methodology document for re-categorisation of DG7. We did not check the procedures in practice however we believe that the methodology seems to be appropriate.

## 5.9 Treatment of contacts from CCNI

Please see Table 5a.

## 6. Assumptions

Except where disclosed above, no assumptions have been identified.

## 7. Confidence grades

The Company has applied a confidence grade of B2 to all the DG7 related information in the table. This is consistent with the grade reported in AIR14. Whilst we have not undertaken any statistical tests, this grade appears reasonable on the basis of our audit sampling. Further control and reassurance is also gained from checks undertaken by the Contract Management Team and Internal Audit.

## 8. Consistency checks

We can confirm that:

- Line 1 equals to Table 5a Line 1
- Line 2 equals to Table 5a Line 2
- Line 4 equals to Table 5a Line 3

## DG8 Bills for Metered Customers

### 1. Introduction

This indicator identifies the proportion of metered customers who receive bills during the year based on actual meter readings and the proportion based on estimated readings.

### 2. Key findings

- The Company report that 99.12% of customers received a bill based on a meter reading in 2014/15. This is similar to the 99.11% reported during AIR14.
- We audited the reported data and challenged the processes on a sample basis. Except where detailed below, we consider the data reported in the table is robustly prepared using systems and process that are appropriate and in line with the reporting requirements and that are properly implemented with effective quality control and governance arrangements.

#### 2.1 Key recommendations

- The main focus of the DG8 audit meeting was determining the basis for the high excluded data (51,214 meters). We consider that it may be appropriate given the large number to comment on the breakdown of the dataset in the company commentary.

### 3. Audit approach

To verify the information provided by the Company our audit consisted of an interview with the NI Water system holder, a review of the current methodology for data collation, an audit of the data from the Company's systems to the final table and a comparison with last year's table entries.

We also checked the data in the final submission for consistency with previously audited data.

### 4. Company methodology

The primary source of data is the Company's billing system and we confirm that the Company presents all the annual data and that no sampling techniques have been employed.

To confirm the methods used by the Company are as they describe and are in line with the Reporting Requirements, we performed a series of reviews and audit checks. From these checks we are content that the approach adopted is in line with their stated methodology.

On the basis of our audits from AIR15 we have provided a summary of our findings and the Company's methodology below:

- NI Water outsources its billing activities to its third party provider.
- The primary source of data is the Company's billing system, Rapid.
- All customers who are eligible for billing are billed, regardless of consumption.
- Before the start of each reading period all meter accounts which need to be read are transferred from the Rapid system onto the Routestar system. These accounts are then transferred onto the PDA's of meter reader who then visits the meter.
- When in the field, all meter readings (including those not able to be read) are input by the meter reader on their PDA.

- Meter readings are uploaded back from the Routestar system onto the Rapid on a daily basis. Bills are then generated on Rapid based on the consumption recorded and appropriate tariff.

The Company described the processes by which meter readings are managed to the Reporter's satisfaction. When meter readings cannot be obtained the meter reader records this on their PDA as being 'skipped' and this is fed back into Rapid. Such instances are monitored and managed by way of 'priority list' which a meter reading contractor lists 'unread' customers regularly and prioritise these meters to be read. The Company does also have the facility for customers to enter a reading via the phone or website. If no reading is provided before the subsequent billing run a system estimate is generated and a bill is issued.

## 5. Audit findings

### 5.1 General

The information to derive DG8 data is supplied from reports produced from the Company's billing records. Summary tables are produced from these records to collate figures for the final table. We reviewed the data in the reports and followed the data trail through to the Company's final table.

### 5.2 DG8 Performance

After subtracting the number of exclusions reported in Line 7 from the total number of metered accounts reported in Line 6, a total of 67,518 accounts are included with the DG8 indicator. The Company state that of this total, 99.12% of customers received a bill based on company or customer meter readings in 2014/15. The reported performance is also above the PC13 Final Determination target of 98.50%. The percentage of meters not read by the Company for two years equates to 0.14% of the total metered accounts or 0.24% of accounts included in the DG8 measure.

### 5.3 Total metered accounts (Line 6)

As we anticipate, the number of metered accounts has once again increased (3.0%) from previously year. This is broadly consistent with the number of household and non-household new connections reported in Table 7. The greatest proportion of this increase relates to household customers which are subsequently excluded from the indicator (see below). The actual number of non-household accounts appears relatively consistent to the previous report year.

### 5.4 Exclusions (Line 7)

As highlighted the above the number of exclusions has increased from 14/15 mainly due to an increase in the number of household accounts being reported in Line 6.

We provide the following breakdown of the exclusions made in the year.

Reason for exclusion	AIR15	% of total exclusions
Charged on another basis	47,612	93.0
New Property	530	1.0
Occupied <181 consecutive days	200	0.4
Void Property	2,872	5.6
Total	51,214	100

Overall, NI Water excluded approximately 43% of its metered base from the DG8 indicator. This is somewhat higher than the average of accounts excluded historically by WaSC's in England and Wales, which is circa 11%. However, whilst providing a useful metric for comparison purposes, it is difficult to make any direct comparisons as NI Water's DG8 statistics include non-domestic accounts only.

During the audit the Company also cited a number of examples where an account would be reported in Line 7 and excluded from the DG8 indicator. Examples of such accounts include:

- Meters charged on another basis
- Test meters
- Trade-effluent meters
- DRD or NI Water meters
- Fire supplies
- Properties occupied less than six months
- Complex accounts – Including combination meters
- Void properties

In the cases reviewed we were content that the Company's methodology in this area reliably extracts data relating to the exclusion type.

## **5.5 Company readings/Company or customer readings (Lines 8 and 9)**

The Company methodology outlines that that is encourages customers to provide their own readings and these can be register via NI Water's website or by calling their billing line.

During the audit the Company provided data from the Rapid system to support the figures presented. Based on this and the audit checks undertaken we are content that the data produced is appropriate for reporting purposes.

## **5.6 Estimated bills only (Line 10)**

Whilst the Company has made endeavours to ensure that every non-household customer receives a bill based on at least one meter reading, NI Water reports a number of instances where this was not possible.

The proportion of metered accounts of receiving a bill based on an estimated reading has increased marginally in the Report Year, although it maintains a stable trend over the 2012-13 period to 2014-15. Approximately 0.8% of those accounts included in the DG8 measure received an estimated bill.

## **5.7 No bills received during the Report Year (Line 11)**

NI Water reports a small number of accounts where the customer has not received a bill during the year. We have no sought to verify the accuracy of the number of accounts reported. We note that the figure has decrease to 54 accounts this year.

## **5.8 Unread by the Company for 2 years (Line 12)**

The percentage of meters not read by the Company for two years equates to 0.24% of the metered base included in the DG8 indicator. This maintains a stable outcome when compared to last year and demonstrates management of reading process.



## **6. Assumptions**

We consider that there are no assumptions to be disclosed and that the data is based on sound procedures.

## **7. Confidence grades**

The Company assigned a confidence grade of A1 to lines 6 to 12. We understand this grade is assigned on the basis data used to provide DG8 performance driven by a system based report that does not require any manual interpretation. The report is taken directly from the Rapid database source which categorises each account automatically based on its status and therefore using the most current and up to date data. We suggest that the Company endeavours to quantify any error rates to fully substantiate that an A1 grade is appropriate as any inherent anomalies in the dataset or report configuration will be ultimately reflected in the reported performance data.

## **8. Consistency checks**

Not applicable.

## DG9 Telephone Contact

### 1. Introduction

This indicator identifies the ease with which customers can make telephone contact with the Company.

### 2. Key findings

- Whilst NI Water point to the introduction of HVCA as an explanatory factor, overall call volumes have continued to increase from that reported previously although the abandonment rate in percentage terms remains steady. We have checked and confirmed the DG9 performance reported in Table 5 for the calls not abandoned metric falls marginally below the target set at PC13.
- Overall call volumes may also have increased this reporting period due to the industrial action which affect services in January.
- Scores from the customer satisfaction survey are also marginally below target, although we note the score has improved slightly compared to last year.
- We audited the reported data and challenged the processes on a sample basis. Except where detailed below, we consider the data reported in the table is robustly prepared using systems and process that are appropriate and in line with the reporting requirements and that are properly implemented with effective quality control and governance arrangements.

### 3. Audit approach

Our audit consisted of an interview with the NI Water system holders, a review of the current methodology for data collation and an audit of the data provided.

We have also checked the data in the final submission for consistency with previously audited data. We have not attempted to reconcile the numbers of calls received to the number of calls logged on the Company's contact management system.

We undertook a call listening exercise of 11 calls to ensure that Rapid records broadly aligned with the recorded audio.

### 4. Company methodology

#### 4.1 Overview

The Company's commentary describes the configuration of its telephony system. NI Water has also identified the telephone numbers (PACCP's) and locations against which they are reporting in their Methodology Statement.

In summary:

- For Customer Billing the office hours are 8am to 8pm Monday to Friday, and 8am to 6pm Saturday.
- The Company's debt line office hours are 9am and 5pm weekdays only.
- For Service Enquiries, NI Water's Waterline and Leakline are open 24 hours a day 365 days a year.
- Calls received outside of these advertised times are not included are in the report of calls received or calls abandoned.

- NI Water has not utilised any temporary customer contact points during the year.
- No message manager systems or answering machine facilities were used during the reporting year.

#### **4.2 Call Services offered/telephony configuration**

During the audit we questioned the Company on the call services it offered in terms of non IVR Queuing or automated speech recognition facilities as we are aware from other experience that calls via such services are often difficult to track and report.

NI Water advised that their telephony system in the report year has been configured so that an HVCA capability can be deployed if required (see HVCA comments) however the other services highlighted are not currently offered.

#### **4.3 Reporting**

NI Water advised that the telephony system is configured to produce data required by the Reporting Requirements. As such data, with the exception of HVCA, is provided for the total number of calls received and calls abandoned and is taken directly from the Call Media system. Telephone complaint volumes are derived from CMS logs in Rapid and exported via a Corvu query based on the list of CMS codes identified as a complaint and any other contact that has the complaint indicator selected.

We have not undertaken any checks on the configuration of these reports. The Company has a documented methodology of how data is collated from the system and during the audit the representatives outlined the processes they follow. Data for the all lines busy indicator is derived from NI Water's telephony provider's systems. Again, we have not tested the reliability or accuracy of this report.

We have checked and confirm that the totals presented in the DG9 lines of Table 5 are consistent with the summary Call Media reports compiled by the Company.

#### **4.4 Telephone Complaints**

See Section 5.6

#### **4.5 Call Handling Satisfaction**

We found that the Company reports all calls received to the market researcher and no exclusions are made. As such it is possible that allowable exclusions are included in the market researchers' sample in each of the designated weeks.

#### **4.6 Quality Assurance**

NI Water advised that regular performance audits take place, including checks on the call handling process, the logging of calls and allocation to CMS code. For reporting purposes the checks (and feedback) given on how calls were recorded onto the Rapid are updated regularly and are used for the reported figures.

These checks are important controls within the reporting process and we would encourage the Company to continue these checks in at least the same level of detail.

## **5. Audit findings**

### **5.1 General**

The volume of calls received on each line is taken directly from Call Media reports (and HVCA reports for calls passed from the Waterline number) and we were able to review the process used to derive call volumes satisfactorily.

Data from monthly Call Media reports are translated into a spreadsheet used to monitor and report on DG9 performance. As an audit test we successfully traced data from the monthly Call Media reports for three months of 14/15 into the spreadsheet and then subsequently into Table 5.

The 14/15 year is the second full year in which the High Volume Call Answering System (HVCA) has operated. Designed to improve the customer experience when demand on the telephony system is high e.g. during an operational incident, the DG9 reporting methodology has been revised to include calls handled by this system. We have consolidated our comments on the HVCA system in Section 5.7 below.

### **5.2 Calls received (Line 13)**

NI Water reported that they have received 230,847 calls from customers during the year. We confirm the total volume of calls received is circa 1.7% higher than received in 13/14 and 5.2% higher than 12/13 prior to the HVAC system being installed.

### **5.3 All lines busy (Line 14)**

The Company report that 32 calls received an engaged tone during the year and we confirmed this through inspection of various telephony reports presented by the Company. We note that of the 32 calls, 31 occurred in July 2014 and 1 in March 2015.

### **5.4 Abandoned calls (Line 15)**

Along with an increase in the overall volume of calls handled, the number of abandoned calls has increased. Overall, performance of calls not abandoned was 98.0%, just a short of the PC13 target of 99% for the 14/15 year.

As reported last year the introduction of the Company's High Call Volume Answering (HCVA) system has appeared to have an impact on the calls abandoned indicator and we comment on the operation of this system in more detail below. Please see Section 5.7.

### **5.5 Call handling satisfaction (Line 16)**

During the audit the Company outlined that they have provided data to the market researcher during the year.

The Company briefly explained the process by which the call data is collated prior to dispatch to the market researcher. All calls are passed to the market researcher and no exclusions are made. NI Water added that they do not manually exclude calls from the data provided which may undermine the integrity of the process. They noted that NI Water does not have 'do not phone' indicator on customer accounts.

In our experience elsewhere, Companies do make a number of small exclusions to the data provided to the market researcher. The possible circumstances where this occurs include:

- Calls (mainly operational) that can be identified as "non-customer" calls (e.g. from field staff or contractors).
- Customers who have ex directory phone numbers.

- From customers sharing the same number (e.g. switchboard).
- If there is a "do not phone" indicator on the account.

These may warrant further investigation by NI Water, although we do not consider that these would materially affect the score obtained.

## 5.6 Telephone Complaints (Line 17)

In the Company's draft submission we noted that the reported number of telephone complaints had decreased slightly to 70,992. On review of the audit trail it appeared the methodology utilised was incorrectly filtering the raw data from Rapid, by taking the complaints recognised by a service failure category only and then filtering these. NI Water subsequently reviewed the methodology to allow for both the coding categories and those calls recognised as complaints (which were not already included in a service failure category) that did not sit in these areas. This resulted in a figure of 76,536. We have reviewed the revised methodology and confirm we consider the reported data appropriate.

## 5.7 High Volume Call Answering (HVCA) system

Under normal circumstances, a call received from a customer is logged by the telephony system and routed directly to an agent. When all agents are busy, the customer call is placed in a queue until the next available agent is free. During the previous Report Year we were advised NI Water had introduced a HVCA system as a solution to answering large volumes of unforeseen calls e.g. due to an unexpected flooding event. Deployed exclusively on the Waterline, the system aims to direct the customer's call to the most appropriate team or message via a series of routing options.

The system's intelligence identifies and recognises customer details (e.g. location) from the details held on the billing system. Depending on the call routing and this intelligence the system asks various questions to help answer the customer query or raise a work order.

It is important to recognise that whilst the HVCA is constantly available, calls are only routed into the system at busy periods using predefined capacity criteria. This limits the volume of calls fed to the systems and under normal circumstances customers would reach an agent.

### ***Abandonment***

Whilst designed to improve customer experience, there is a risk that the deployment of the HVCA system may lead to an increase in the abandonment rate due to initial customer responses to the system.

NI Water has reported an increase in abandonment and attribute this increase to the deployment of HCVA (NI Water also advised that there is evidence which highlights repeat calls from customers who have abandoned and then redialled has led to increased call volumes).

The HVCA has over 200 hang-up locations which customers may reach depending upon the selections they make within the system. NI Water presented a flow chart which illustrated these hang up locations and potential routing options. Analysis of each of these locations is crucial as it will define whether a customer's call has reached the salient point (and therefore considered answered) and we queried whether each hang up location was mapped to either an answered or abandoned category. In response NI Water provided a document which mapped each hang up location to an answered or abandoned category.

We reviewed the HVCA routing plan provided by the Company and inspected this mapping in relation to the calls abandoned indicator.

### ***Reporting***

NI Water described the development of a reporting methodology for HCVA reporting based on the presentation previous given to the UR.

This methodology makes allowance for calls passed from Call Media to HCVA. This ensure that calls passed from Call Media to HCVA are not automatically categorised as answered. We reviewed the logic presented by NI Water (presented as Option 3) and although relatively complicated in the spreadsheet provided consider it to be appropriately based to report data in the DG9 metric.

## **6. Assumptions**

We believe that all relevant and material assumptions have been disclosed above by either the Company or the Reporter.

## **7. Confidence grades**

We believe the confidence grades assigned to Lines 13 to 17 are appropriate but have not undertaken any specific or statistically significant checks to verify the volume of calls reported.

## Special Assistance Register

### 1. Introduction

This table identifies customers registered for special assistance.

### 2. Key findings

- We believe the methodology to populate the Special Assistance Register is appropriate and in line with the Reporting Requirements.
- The number of customers registered on the scheme has increased by 6.2%. We believe this is a combination of efforts to promote awareness amongst the customer base.
- We audited the reported data and challenged the processes on a sample basis. Except where detailed below, we consider the data reported in the table is robustly prepared using systems and process that are appropriate and in line with the reporting requirements and that are properly implemented with effective quality control and governance arrangements.
- Given its sensitive nature and need for deployment when operational needs required it, we checked the access restrictions on the register and the updating of information to the Company's GIS system. The access restriction were found to be suitable and GIS updating time of 1-2 days, exemplary.

### 3. Audit approach

Our audit consisted of an interview with the Service manager, a review of the current methodology for data collation, an audit of the data provided and a comparison with last year's table entries. Although the focus of the audit has been to review the number of customers registered on the Special Needs Register, not the operation of the scheme, we have reviewed how NI Water manage access to the database and how the data is updated to the GIS system as this is where hold the data becomes most beneficial to the Company and the customer.

We have also checked the data in the final submission for consistency with previously audited data.

### 4. Audit findings

The Company's Special Needs Register is called the Customer Care Register. At the end of the 14/15 Report Year the Company advised that 3,084 customers were recorded on the Customer Care Register. The number of customers registered on the scheme has therefore increased by 6.2%. We believe this is a combination of efforts to promote awareness amongst the customer base.

During the audit we discussed a number of aspects of the operation of the scheme. The following provides an overview of these discussions:

- The reported figure is extracted from the Rapid system and registration on the scheme is managed by the Company's Service Provider.
- We met with a representative from the Company's Service Provider who explained how new registrations onto the scheme and how existing registrations are managed. We were advised that new registrations are managed by a dedicated team and existing registrations have been verified during the year. From the discussions held we believe the approach is reasonable.
- The Company confirmed and we checked that where a customer is registered for more than one service, they are only counted once in the total number of customers reported in Line 18.

- The Company also confirmed that customers are registered on a household rather than individual customer basis.
- The database file is not password protected but is held in a restricted area where only those who require access have been provided with access rights.
- We noted that individuals are counted. In the case of nursing homes this means that a number of nursing home residents are counted for the same nursing home. We noted at audit that it may be possible to count nursing homes using addresses. However reporting of the data is consistent with previous years.
- The Company has assigned a confidence grade of A2 to this line. We believe this grade is appropriate.

## **5. Assumptions**

We consider that there are no assumptions to be disclosed and that the data is based on sound procedures.

## **6. Confidence grades**

The Company has assigned a confidence grade of A2 to this line. We believe this grade is appropriate.

## **7. Consistency checks**

Not applicable.