Table 5a – Customer Complains Data for CCNI (Total)

1. Introduction
This table summarises written complaints received by a company into 5 complaint categories defined by the Consumer Council.

2. Key findings

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

- The breakdown of complaints reported by the Company is consistent with the complaint volumes reported in Table 5.
- The data reported is fully consistent with the data trail reviewed at audit.
- 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
The audit involved an examination of the procedures adopted by NI Water for its customer service activities regarding customer complaints. Whilst the main focus of our audits has been on the work systems and practices used by the Company in preparing data for Table 5, we have carried out a sample check of DG7 items that included their categorisation. We have also reviewed the methodologies used to populate Table 5a.

4. Company methodology
The Company methodology is similar to that employed for DG7 – written complaints.

Essentially, the Company utilises the Rapid system to extract the required data to populate the table. The raw data extracted is filtered and process to count the categorisations applied within Rapid. During our audits of DG7 we reviewed the Company’s processes for dealing with written complaints, including the operation of this system. Please see our Table 5 commentaries for further details.

From discussions with the Company and checks carried out we believe the methods used by the Company are as described in their methodologies. CMS codes are used by agents to allocate complaints to a particular category.
5. Audit findings

5.1 General
During the audit, we discussed with the Company their methodology for completing this requirement. The Company explained that as for the DG7 measure, they extract data from the Rapid billing system.

5.2 Total written complaints – Lines 1 to 3
We confirm the source of these lines is Table 5 Lines 1, 2 and 4. Please see our DG7 commentary for the derivation of these lines. We also confirm that the totals and the associated confidence grades reported in these lines is consistent with Table 5.

5.3 Category of written complaints – Lines 4 to 13

5.3.1 Allocation to category
During the audit the Company explained that as each complaint is logged it is allocated to a category. The categories are aligned to those in the reporting guidance. NI Water confirmed the allocation of complaints to categories is completed on closing CMS codings rather than opening codes.

We confirm the addition of Lines 4, 6, 8, 10 and 12 equal the number of complaints reported in Line 1.

5.3.2 Allocation to Stage
In our review of DG7 (see Table 5 commentary) we reviewed a number of complaints. From the checks carried out we believe allocations made to be materially reasonable.

5.4 Number of holding responses issued (Line 14)
The items reported relate to holding responses issued within the Report Year where a written complaint has been received and allocated as ‘open’ in the Report Year.

The Company has introduced a case management system which has reduced the need for standalone spreadsheets to be collated in order to report on this metric.

5.5 CCNI Investigations (Line 15)
The Company report 28 CCNI investigations in Line 15.

We discussed the approach taken by the Company and they explained how written complaints are logged to the appropriate CMS code to the Reporter’s satisfaction. We tested a small number of complaints and agreed with NI Water’s classification. During AIR14 testing we noted dialogue between CCNI and NI Water over the correct classification of a contact. This challenge process gave additional assurance that CCNI investigations are being logged in line with their expectations.

6. Assumptions
We believe all assumptions have been reported.

7. Confidence grades
For Lines 1 to 3 – “total written complaints”, data is copied directly from Table 5 and therefore the grades assigned to these lines are consistent. Please see our commentary on Table 5 on the appropriateness of the confidence grades assigned to these lines.
For Lines 4 to 13 and 15 – “Category of written complaint”, data is extracted directly from Rapid and therefore the Company methodology does not rely on sampling or extrapolation to populate the table. The B2 grade is reflective of occasional uncertainty when identifying complaints and then allocation of complaints into particular service areas.

For Line 14 – “Number of holding responses issued”, the grade assigned is B4 due to data being compiled from several independently maintained spreadsheets. If ‘on-system’ reporting is introduced we would expect this grading to increase as data confidence should improve.

8. Consistency checks

We can confirm that:

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