





CCWater Written Complaint Assessments Overview

2016/17

1 Introduction

The Consumer Council for Water (CCWater) is the independent non-departmental public body that represents the interests of water customers in England and Wales. We operate through five committees, four in England and one in Wales.

One of our main areas of work is to ensure water companies sort out customer problems quickly and without hassle. We do this by working with poor performing companies to identify and deal with root causes of complaints, identifying good practice and sharing it across the industry.

Written complaint assessments are an important part of this work. We review the performance of companies in our annual complaints to the industry report. We determine and assess those we define as 'at risk' because of poor complaint handling. An Assessment Panel visits "at risk" companies to carry out assessments of their complaint handling from a sample of cases. We consider:

- whether the company has adhered to its complaint procedure;
- how well the company has dealt with the complaint and whether it has addressed the customer's concerns and signposted to the next stage;
- if the company has dealt with the complaint within its own or regulatory timescale.

This report covers the outcomes of the written complaint assessments carried out in 2016/17.

2. Written Complaint Assessment Process

Under our 'risk-based' approach, we select companies that have performed comparatively poorly in our annual complaints to the industry report. The factors determining our selection of companies include:

- a high proportion of written complaints to the company per 10,000 connected properties;
- an increase in written complaints to the company on the previous year; and
- a higher than industry average proportion of complaints not resolved at the first stage of the company complaints procedure.

We select a random sample of 25 billing and operational complaints that include a small number of complaints that were escalated to the second stage of the company procedure. Companies complete a questionnaire ahead of the assessment, which gives the Assessment Panel an update on its complaint handling performance for the current year and what strategies it has put in place to improve its customer service.

On the assessment day itself, CCWater's Assessment Panel visits the company and will discuss with company representatives complaint performance and strategies based on the information provided in response to the questionnaire. The panel then assesses the selected complaints using a standard proforma and feeds back its findings to the company. We mark cases as either 'Good', 'Acceptable' or 'Not acceptable' based on a set of criteria. Part of the feedback to companies is noting the positives of its complaint handling through identifying good practice and providing recommendations to companies on how to improve further in dealing with customer complaints.

To ensure consistency, the basis of the assessment is how the company handles complaints rather than their cause or resolution. Our focus is on whether the company has:

- adhered to its procedure;
- addressed all of the points in the customer's letter;
- considered the customer's individual circumstances; and
- adhered to its own timescales.

CCWater reports the panel's findings to the company. Companies have the option to appeal any cases marked 'not acceptable if it does not agree with CCWater's findings.

3. Observations from the assessments

In 2016-17, we found all of the companies we assessed were dealing with written complaints effectively and most of the cases marked 'Not acceptable' stemmed from administrative failings.

We were pleased to see companies adopting new and innovative ways of communicating with customers, including social media platforms and being more pro-active in contacting customers rather than waiting to be contacted.

Overall, 75% of the complaints we assessed were marked as 'good' or 'acceptable'. This was a welcome improvement on the previous year's figure of 69%. It was good to see companies providing or offering a copy of their complaints procedure as, in previous years, this has been highlighted as one of the most common causes for complaints being marked as 'Not acceptable'.

4. Good company practice

In total for 2016/17, our assessment panels identified nine areas of good practice from the companies. Some were administrative such as keeping the customer informed and keeping good case notes. More innovative areas of good practice included:

- the company providing an acknowledgement letter following receipt of the complaint introducing a point of contact to the customer;
- adopting a 'make a friend' initiative- where staff were encouraged to treat customers as they would a friend with no pressure on time limits for dealing with calls;
- 'Bump it up' where staff were encouraged to run things by managers if something did not feel right;
- a direct telephone line for customers moving property;
- contacting the customer when meter readings are higher than expected before the bill is sent out.

5. Assessment panel recommendations

As well as general observations, CCWater assessment panels make recommendations to companies based on their findings. Although we only see a small sample of complaints, these can reveal some areas where the company may need to improve. It is the company's decision whether to adopt the assessment panel's recommendations but most do. CCWater assessment panels made 16 recommendations in the year. Some were quite broad and included:

- better note taking;
- being more empathetic and less defensive when responding to complaints;
- apologising for the actual service failure rather than for the customer having to write in because of it;
- identifying the root cause of complaints as many were avoidable.

More specific recommendations included:

- following up on the more difficult complaints to the point where the customer is satisfied, rather than just responding;
- trying to reduce response times on the more straightforward complaints;
- having a process to inform customers when visiting and recording the outcome of the visit;
- for complaints about arrears, where possible looking to signpost customers to assistance schemes;
- confirming with customers that actions are being taken; and
- empowering staff so they can take decisions on the more straightforward complaints without having to go to management.

6. Conclusion

Companies continue to build on the improvements from previous assessments. By selecting companies who we consider 'at risk' for complaint assessments we are able to focus on those companies that would benefit the most.

Assessments provide us with an opportunity to visit the company and discuss complaints and see directly how companies are dealing with complaints. It is good to see that what we considered good practice in previous years is now becoming the norm.