

Within the current standards what works well and why?

We believe the current GSS standards provide clarity for both customers and water companies on what the very minimum levels should be for the core services. The standards with a clear calculation to measure service delivery, such as water supply restored within a timescale or responding to a written contact within a set timescale, are the most effective. The one standard we believe provides a clear opportunity for improvement is the pressure standard, as this is difficult for water companies to monitor at an individual property and impossible for customers to measure themselves.

Should the standards be refreshed and, if so, how?

We believe the standards do need to be brought in line with current customer expectations to reflect the contact channels and technology being used by customers and water companies. There are inconsistencies across the industry in the way standards are interpreted, so additional clarity explaining what is meant or addressing any ambiguity would be beneficial. A review of the payment amounts seems appropriate, but we'd ask any increase in amounts stay proportionate to what has happened and the PR24 process, linked to customer bills be taken into consideration. We also acknowledge that some new standards may need to be drawn up.

What needs to be changed and why?

We feel a review of the standards relating to responses to written contacts should be a priority, to understand whether these could or should also apply to telephone and other real time contact channels. A further consideration would be to expand the accuracy of bill and payment changes standard to include other forms of billing query or to have a general standard that covers all forms of non-complaint customer contact.

Reflecting on the appointment guarantee, we believe a review should look to clarify whether this encompasses Developer Services activities and consider the inclusion of any emergency attendances to customers' properties.

With the low pressure standard currently measured against 7m/h, we believe this is impractical for both water companies and customers. An average customer may struggle to understand what 7m/h is in real terms and often low pressure is related to a combination of factors, with the issue of the internal plumbing arrangements often being a significant contributor. This leads to eligibility being very difficult to prove and the standard would benefit from a complete review or potentially complete removal.

We recognise the responses to the sewer flooding standard were fair and we agree that GSS should be updated to reflect the work completed under the End Sewer Flooding Misery campaign.

While in principle the inclusion of detached garages and outside buildings could be deemed as internal flooding, we believe there needs to be specific guidance provided to recognise this does not extend to lean-tos, car ports, sheds or other non-permanent structures that are not used as living space. Some increase in the payment for sewer flooding events should be considered but we do not feel that payments for inconvenience, which is often subjective, or payments for damage, which may be subject to separate compensation claims, should be incorporated into GSS.

We already process penalty payments automatically as part of our Customer Guarantee Scheme and believe that this should be incorporated into GSS.

Are there new standards we should add, are there others that are out of date and need revising?

We suggest that the low pressure standard should be completely reviewed while others, referenced above, may need updating.

Should payments better reflect the impact of service failures on customers, considering both the direct financial costs and the inconvenience?

We believe GSS is most effective when there are clear amounts to be made for standard failures that are not subjective. Providing a response within 'x' days or failing to restore the supply within 'y' hours provides the necessary clarity for both water company and customer. We don't believe GSS should overlap with situations where compensation may be claimed, or required, for circumstances such as inconvenience that are entirely down to perception. A perceived inconvenience will vary greatly between customers making an appropriate payment difficult to benchmark. While there is value in agreeing best practice across the industry for payments for varying levels of inconvenience and goodwill, this should not be incorporated into a statutory scheme. GSS should also not be used to replace any formal claim or legal liability process that companies may operate where costs, damage or injury has been incurred.

Should different service standards apply for customers who need extra help or who have been identified as needing extra help, especially those on the priority services register?

Whilst in principle we believe there is the scope for levels of service to be adapted for those customers who have specific needs, there would need to be a robust definition and clear operational parameters to ensure consistency across the industry. There are numerous practical implications and resourcing constraints to overcome in implementing payments in relation to services driven through a PSR. In addition, there are significant costs involved in setting up and maintaining an additional compensation scheme and these would fall on customers through higher bills. The value of being on the PSR is derived from our recognition of individual customer needs, and the subsequent tailored conversations we are able to have. This value could be compromised, should a generic standard be introduced and all PSR needs treated in the same manner.

Has your company asked customers for their views on GSS and, if so, what did they say? Can you share the research with us?

We undertook some research with our customers in 2018 which broadly told us that customers felt the compensation levels were fair and proportionate and that focus should be placed on preventing failures from occurring in the first place which we are working through within our Turnaround Plan.

How do you use GSS data internally to drive performance?

As a company, GSS is just one of a suite of metrics which are used to measure performance and is a useful indicator to help identify where core services may be failing. This also links to areas of dissatisfaction which may affect C-MeX and our complaints performance and informs financial performance to help support and measure improvements to our services.

All companies have, at some point, voluntarily enhanced their GSS. What triggered this decision for your company?

Our last set of enhancements to our Customer Guarantee Scheme were made following customer feedback and a desire to demonstrate that we take the issue of customer service very seriously. As well as incorporating voluntary standards into our Customer Guarantee Scheme, we have;

- enhanced some payments beyond GSS levels
- make all penalties automatically and

- extend the terms of our Scheme to make EGSS payments even if the strict GSS criteria is not met.

Outside of our CGS we have a comprehensive compensation policy that covers generous payments for instances of severe inconvenience and guidance for our staff on when to make goodwill payments for service failings that may not be covered by GSS.

Faced with the changes arising from climate change, how should we consider the issue of ‘extreme weather’?

Our experience has shown the exemption for severe weather for sewer flooding is not understood by customers and is seen as an excuse for water companies not to make a GSS payment. The application of the exemption is also very subjective. Whenever we have historically used this exemption, it is supported by rainfall data taken from nearby Met Office sites and often by using the Bilham formula. Nevertheless, without desktop modelling, it is very difficult to gauge how a sewer may operate at a specific location when it may be subject to significant flows of water channelled to it from elsewhere further upstream in the catchment.

Severe weather exemptions applying to ice and snow may be applied for burst water main interruptions and for failing to attend appointments because of road conditions. However, these are often not understood or accepted as valid reasons why payment for a failure could not be made.