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# Complaint reporting Guidance for Household customers

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# 1. Guidance overview

## 1.1 Introduction

CCW uses data on complaints as an indicator to identify areas of good and poor performance and to press water companies to put right instances of poor service. To this end we ask companies to report summary complaint information on a quarterly basis.

The information is used as a reputational incentive in CCW's annual Household Complaints Report and will be used as a financial incentive alongside Ofwat's Customer measure of experience (C-MeX). CCW will work with companies on an ongoing basis to share information that can help improve performance.

CCW and companies will review this guidance periodically to ensure it remains relevant and reflects the demands of the changing water industry.

## 1.2 Purpose

This guidance is designed to help water companies in England and Wales categorise and report complaints in a consistent way to ensure that complaint reporting provides an accurate reflection of the service they are delivering to customers.

It is not intended that this guidance instructs companies on how they should deal with complaints; this is down to the companies' own processes and procedures. However, we expect companies to consider this guidance when implementing any new processes or initiatives to ensure any changes do not conflict with the guidance.

To avoid inconsistency, CCW will support this guidance with examples of complaints where common questions have previously arisen. Where no appropriate example exists, and there are areas of doubt or ambiguity, companies should seek advice or clarification from CCW. CCW will either clarify the issue or raise it with the industry to reach agreement. The guidance and/or complaint examples supporting it will be reviewed as necessary to reflect any new decisions that are taken.

### Overarching principles

This guidance follows five overarching principles for company complaint reporting. Companies should report all complaints which fall under the definition unless an exemption applies (exemptions are included in Section 3).

**Principle 1:** Inbound only – companies should only report complaints when the customer contacts the company.

**Principle 2:** Customer must be identifiable (see Appendix 1 for Definitions).

**Principle 3:** Customer feedback solicited by surveys is excluded.

**Principle 4:** Guidance does not apply to non-household customers.

**Principle 5:** A complaint is afforded the same rigour and importance regardless of the channel through which it is raised.

# 2. Managing complaints

## 2.1 The Complaint definition

The definition of a Complaint for Household customers is:

*'any inbound contact from a customer or customer's representative that expresses or implies dissatisfaction with the charges, service or functions provided by the company.'*

For complaints submitted in writing (including letter, email or webform), dissatisfaction should be identified in the body or title of the written correspondence/ contact.

For real time communication, dissatisfaction should be assessed based on the customer's sentiment at the close of a telephone/web chat/visit contact. Where a customer has expressly used the word complain or complaint during the course of a contact but are satisfied at the end of the contact, the company should check whether that customer wishes for the contact to be categorised as a complaint.

Complaints relating to a company policy or to issues that may not be directly attributable to the company should be recorded if it is the perception of the customer that the company is responsible (unless an exemption applies).

Further definitions associated with this guidance are detailed in Appendix 1.

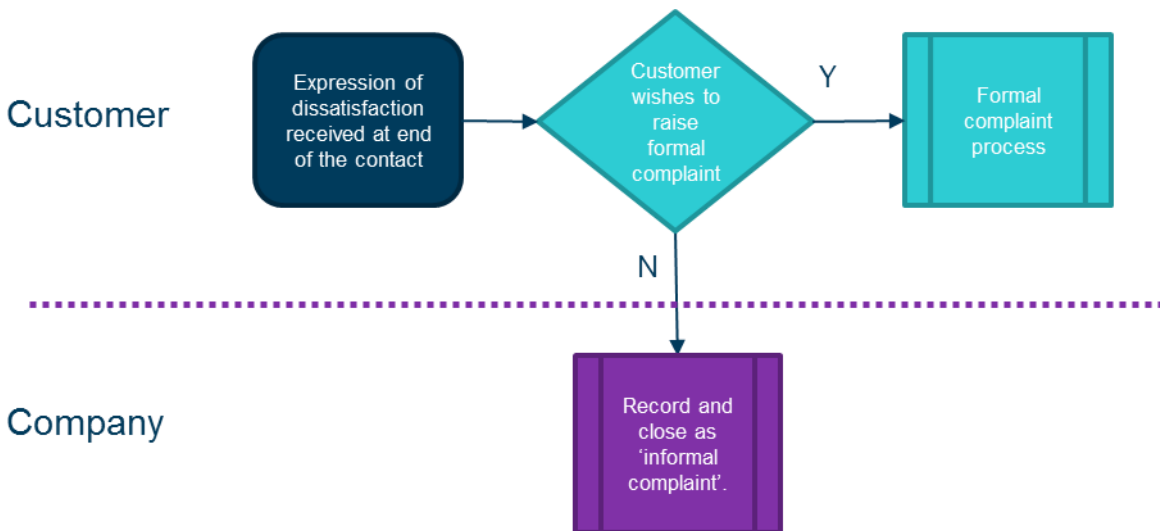
## 2.2 Informal complaints

Where a customer expresses dissatisfaction during real time communication the contact will be classed as an informal complaint where:

- There is still clear dissatisfaction at the end of the contact, but customer understands that no further response will be issued
- The customer explicitly said during the contact that they wanted to make a complaint and at the end of the contact even though they are satisfied, still want to record it as a complaint

If a customer expressly wishes to raise the complaint more formally, the complaint should instead follow the formal process. Fig.1 shows the informal complaints process.

**Fig 1. Informal complaint process**

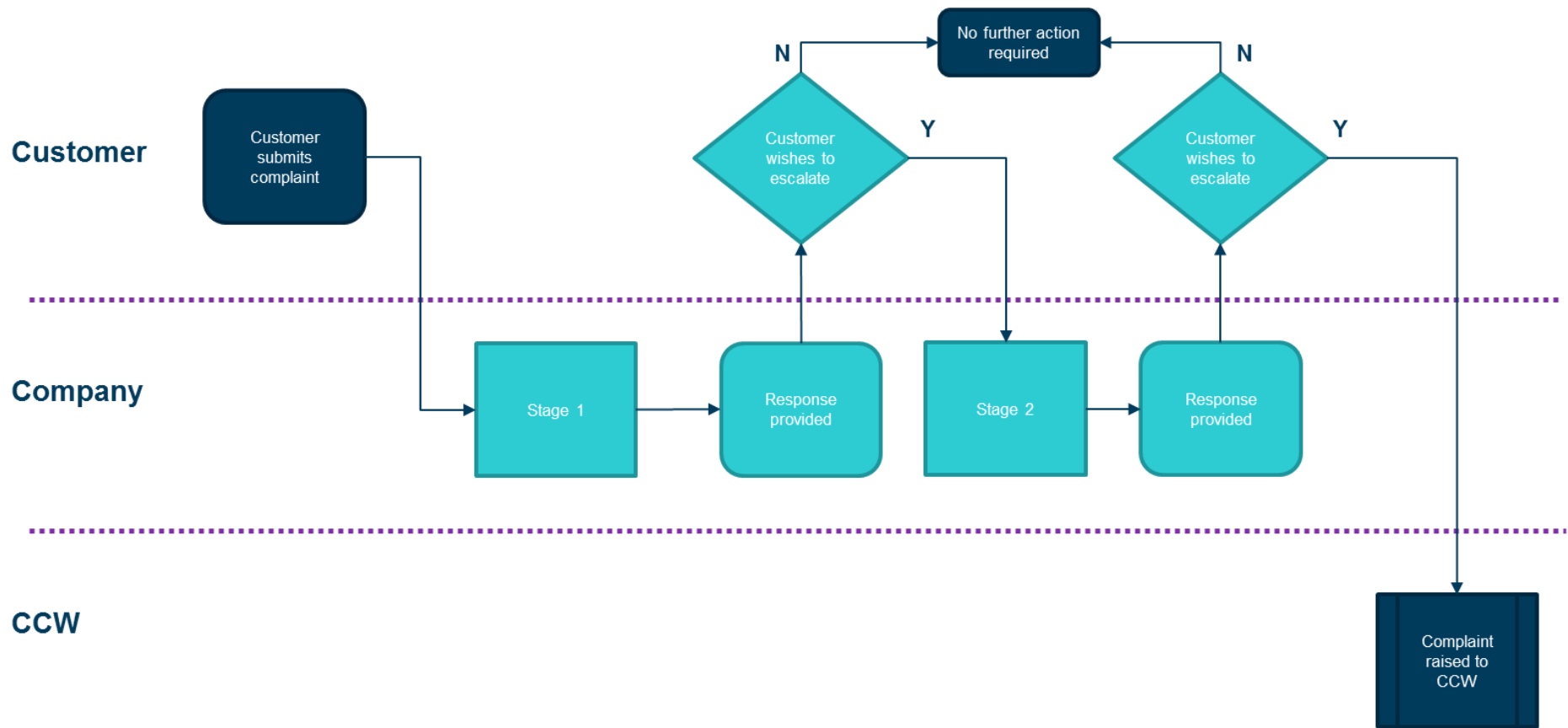


### **2.3 Formal complaints**

CCW believes companies should have no more than two stages in their formal complaint procedure; Stage 1 being the initial complaint raised by a customer, Stage 2 where a customer remains dissatisfied that the complaint has been resolved and chooses to escalate the complaint (see section 2.). This process is referred to as the **formal complaint process**.

Fig.2 shows the high-level process for formal complaints through to escalation to CCW.

Fig. 2 Formal complaint process

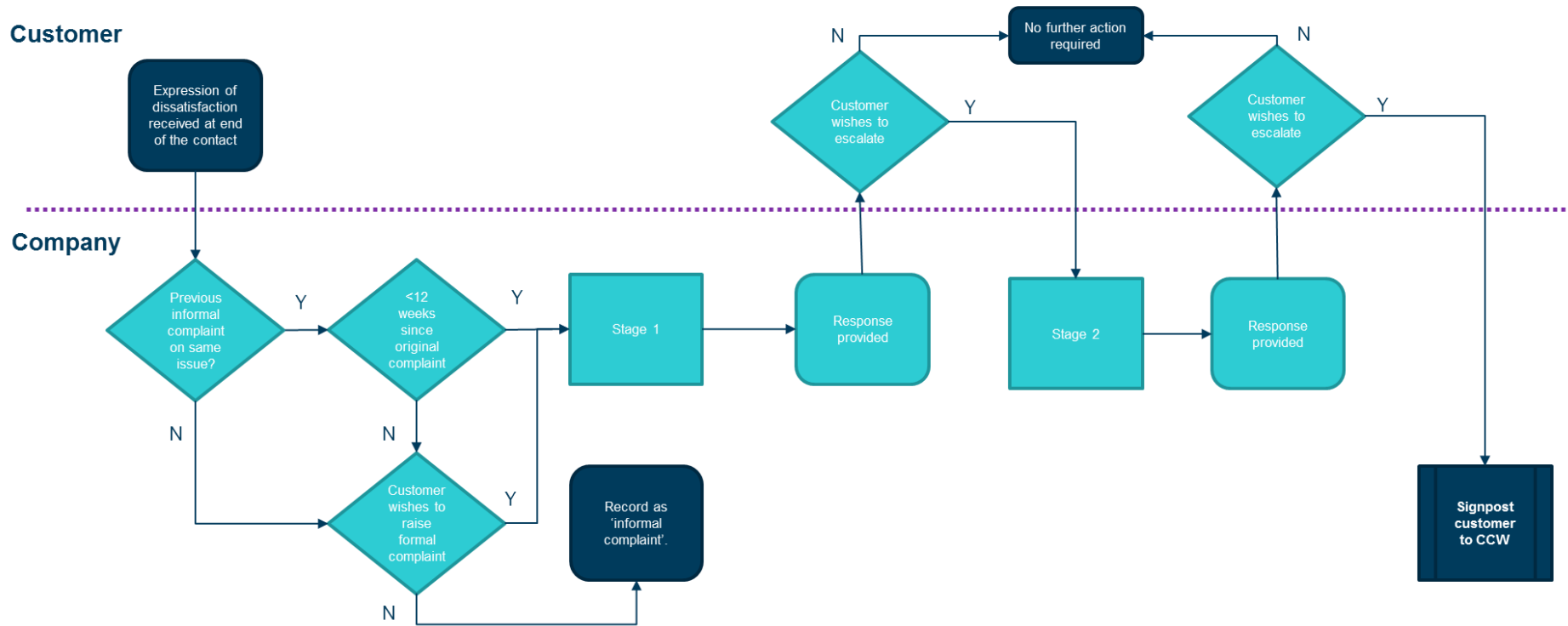


## **2.4 Transition from informal to formal complaints process**

In the event that an informal complaint has been recorded and the customer returns with dissatisfaction (at the end of the contact) on the same issue within 12-weeks of the informal complaint being raised, then this should be registered as a new formal complaint. Any complaint after the 12 week period should be managed as a new contact.

Fig. 3 shows the high-level process for informal complaints and subsequent transition to a formal complaint.

**Fig. 3 Transition for informal to formal complaint**





## **2.5 Real-time complaints**

This section covers contacts and complaints that companies can potentially be handled in real time. Companies should manage contacts to suit the customer's preferred contact channel. Complaints via email and web form are not included in this section.

### **2.5.1 First customer contact**

As detailed in section 2.1, real-time complaints are determined by the customer sentiment at the end of the contact or visit.

To avoid doubt, we recommend companies ask customers if they are satisfied with the company explanation or its proposed next steps at the close of the contact, but do not place undue pressure on customers to agree. If a company is in doubt of the customer's sentiment and chooses not to ask, then it should report the contact as an informal complaint. The company should only consider the customer sentiment at the close of that contact and not base it on the outcome of any subsequent survey (e.g. 'Voice of the customer').

If a complaint handler cannot answer the customer's points then, where possible, they should offer the customer a handover to another member of staff. In this event the customer sentiment should be based on the conclusion of the contact and not at the point of handover. Where a member of staff is not immediately available to respond to a complaint, the company should explain to the customer and conclude the contact by the close of business the next working. Any contact that continues beyond this should be reported as a complaint unless an exemption applies.

If the customer requests a call back, or the company initiates the call back, it should be treated as the continuation of the initial contact. The customer sentiment should be considered at the conclusion of the first call back only and not subsequent contacts. All subsequent contacts should be reported in line with this guidance.

In the event a contact is prematurely ended, such as loss of internet connection or mobile signal then where possible, the company should endeavour to contact the customer if it can. If this is not possible then the company should consider the customer sentiment at the time of disconnection when considering if it should log the contact as an enquiry or complaint.

If a customer is not able to conclude the contact and requests it to be resumed at a later date, then the company should consider the customer sentiment at the end of the subsequent contact.

### **2.5.2 Call back for webchat and social media**

For webchat and social media contacts, in the event companies ask customers to provide their telephone number for them to contact them over any issue, then the company call back should be treated as an inbound contact. If the customer sentiment is negative at the end of the contact then it should be reported as a complaint. Complaints should be reported by the initial method of customer contact.

### **2.5.3 Complaints via social media**

Companies should report complaints through all social media channels they offer as contact channels.

Only when the customer has used the company social media handle should the contact be considered as a potential complaint by the company. All advertised company handles should be included in the measure of complaints.

Companies should only report complaints through social media where the customer contacts the company directly, either through a visitor post on the company page or site or direct/personal

message as per Principle 1 with the company being able to identify the customer in line with Principle 2.

Customer comments about another customer posting should not be reported as a complaint.

Where a member of staff is not immediately available to respond to a complaint, the company, if it feels a response is warranted, should contact the customer and conclude the contact by close of business the next working day. Any contact that continues beyond this should be reported as a complaint unless an exemption applies.

#### **2.5.4 Customer / company engagement via social media**

Customer comments in response to a company posting on its social media page should be responded to at the company's discretion. Where the company does not feel a response is warranted then the customer comment should not be reported as a complaint. Where a company does respond directly to a customer from a post, such as if the customer is asking for further information or has been affected by the subject of the post then the company should report the contact as a complaint if at the close of the contact the customer is dissatisfied or implies dissatisfaction unless an exemption applies.

If the customer refuses to engage with the company or does not respond to the company request for further details from a social media post or direct message request then this guidance assumes the customer does not wish to pursue the issue. The contact should therefore not be reported as a complaint.

#### **2.5.5 Subsequent contacts about the same issue**

It should not be assumed that subsequent customer contacts relating to the same issue are an expression of dissatisfaction. All contacts should therefore be assessed in line with the complaint definition outlined in 2.1.

### **2.6 Complaints made in writing**

Written complaints include those received by post, email, and web form. All written complaints should follow the formal complaint process.

#### **2.6.1 Petitions**

If a petition is submitted to the company, either via post or online, the company must respond to the customer who has sent in the petition. Depending on the nature of the petition, the company may also choose to respond separately to each person who has signed the petition. Companies should report as individual complaints the number of separate contacts received through the petition - for example, where a number of customers have used the same standard letter and have sent it to the company separately.

If the petition is submitted as one written contact, then it should only count as one written complaint, whether the company chooses to respond just to the person who sent in the petition or to all of the signatories. Online petitions should be treated as one written complaint if the company sends a standard response to all signatories.

#### **2.6.2 Reporting written billing complaints received about another undertaker's policies and procedures**

Where companies bill on behalf of other undertakers, the company that responds to the written complaint should report the complaint.

#### **2.6.3 Reporting complaints to / about contractors**

We expect companies to have assurances in place to ensure that contractors working on their behalf keep sufficient records of customer contacts, for example those that carry out operational

works or debt collection agencies. Contacts to these organisations from household customers should be reported if they fall under the definition of a complaint in this guidance. Complaints from customers who approach field staff or contractors directly while they are carrying out works should not be reported.

Complaints to contractors or other agents about work they are doing on behalf of the company must be reported, even if the contractor or agent deals directly with the complaint. If the customer writes to both the contractor and company about the same issue, then these should be dealt with by whichever organisation responds (in line with the agreement with the company and contractor) and explained to the customer. The duplicate complaint should not be reported (see Exemptions E.7).

Companies must also report complaints about contractors or other agents as a complaint, even if the complaint is referred to the contractor to resolve.

Companies should be able to demonstrate through assurance processes that external service providers understand this guidance and their contact data can differentiate what is and what is not a complaint.

#### **2.6.4 Response**

This is defined as a response to a complaint that does one or more of the following:

- Provides an explanation of the company's relevant policy or procedure and indicates why, in the company's opinion, no further action on the customer's complaint is required;
- Informs the customer that action to resolve the complaint has been taken and identifies when the action occurred - for example, flushing of mains.
- Informs the customer of when action to resolve their complaint will be taken if action cannot be taken immediately; for example, "programmed capital works are not scheduled until month and year, and should be completed by month and year".

Companies are required maintain an appropriate audit trail for informal and formal complaints that can evidence responses provided and key decisions taken.

#### **2.6.5 Answering written complaints by telephone or by visit**

Where companies use the telephone or make a visit to respond to a written complaint, then the date of the phone call or visit will count as the date of response provided that the call or visit provides a substantive response to the customer. Phone calls or visits that acknowledge receipt of the written complaint or do not address all of the issues raised by the customer will not be deemed as substantive.

#### **2.6.6 Holding reply**

This is defined as a response to a complaint, which advises the customer that the company will need to carry out additional research or other actions before being able to respond to the customer's contact. A holding reply can be counted as a substantive response if it informs the customer what further action must be taken to respond to the complaint and includes a date by which investigations or further actions will be complete and by when the customer will receive a further communication from the company. A substantive holding reply will close a contact for reporting purposes but not for the company until all actions have been taken and a further response is sent to the customer. Companies are advised not to use holding replies excessively as it risks unnecessarily delaying a complaint to its resolution.

Where companies are unable to provide the date by which investigations or further actions will be complete, companies must include the number of days in which they will contact the customer again and the number of days after the contact that the substantive response will be sent to the customer. For example, where a visit is required the response should state the company will be

in contact within XX days to arrange the appointment and that a substantive response will be provided XX days after the visit.

## **2.7 Escalated complaints (Stage 2)**

Where a company has provided a response to a complaint and the customer remains unsatisfied that the complaint has been resolved, either in totality or in part, then the complaint should be escalated in accordance with the company's approved complaints procedure. This is referred to as Stage 2 of the complaints process. Stage 2 complaints will usually be reviewed by a person or persons not involved in providing the response to the customer's initial complaint.

Stage 2 complaints can be raised through any channel regardless of the channel through which the original Stage 1 complaint was raised.

Where customers have shown dissatisfaction with the way in which a complaint is being handled and have explicitly asked for somebody else to deal with the complaint, this should be categorised as a Stage 2 complaint.

Companies are advised not to allow complaints to become protracted and should signpost customers to the next stage of their procedure in case they remain dissatisfied. Companies should signpost customers to CCW once a complaint has been open for eight weeks and/or when the complaint has exhausted their procedure and the customer remains dissatisfied.

### **2.7.1 Complaints dealt with by the same member of staff**

Customers may address a second complaint to the company representative who responded to the first correspondence. If the second contact provides no new issues or information, and the same member of staff responds, then the company should record the complaint as an escalated complaint (Stage 2). Companies are urged not to undertake protracted correspondence with customers and follow a consistent approach in escalating complaints.

### **2.7.2 Senior level response**

Depending on the nature of the complaint (for example, an allegation of gross misconduct), some companies 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. In such circumstances, the company should classify the complaint at the first stage of their complaint procedure. If the customer remains unhappy and follows up the initial complaint, then this second contact is to be recorded as an escalated complaint (Stage 2), unless one of the above exemptions applies.

Where a Managing Director or Chief Executive Officer responds to the first complaint, then the company should record it as Stage 1. A second complaint from the customer, which provides no new significant information or issues, should be reported as an escalated complaint (Stage 2) and preferably dealt with at the same level to prevent it going backwards into the company procedure.

In some cases, the Managing Director or Chief Executive Officer may consider the first response is their final stage. In this scenario, the customer should be advised of this in the response to their complaint and the complaint should be reported as stage 1. Where this applies, and the company does not wish to carry out a further review after the first response, the second customer contact should fall under the exclusion E.16. In these circumstances, the customer should be advised to approach CCW.

### **2.7.3 New Issues (not stage 2 escalation)**

In some cases, subsequent contact from a customer expressing dissatisfaction will raise a new unrelated issue instead of or in addition to the original service failure. Examples of this may include:

- attitude of company staff;
- the date or timeline to resolve operational works; and
- compensation for the original service failure if it is not mentioned in the customer's first contact or is not part of the resolution of the initial complaint.

A company should report these contacts as a Stage 1 complaints if:

- it can evidence the new issue(s) were not raised in the previous complaint and could change the company position of the original complaint; or
- the original complaint has been resolved to the customer's satisfaction.

In all other cases concerning a new issue, the company should assume the complaint relates to the same grievance and report the complaint as a Stage 2 escalation.

If further contact from the customer has no relation to the original complaint, then the company should begin the complaint process from Stage 1 providing it falls under the definition of a complaint in this guidance.

If a customer submits a second complaint about the same issue but the company has not had chance to respond (such as a contact sent before their published response time from the original complaint) then the company should continue to treat the complaint as a Stage 1.

For written complaints, if a customer contacts the company and says there has been no reply to the first letter then the company should treat that as a Stage 1 complaint unless the company received the original complaint and failed to respond in their published response time in their written complaint procedure.

Requests for information, such as an update on planned works should be treated as an enquiry.

#### **2.7.4 New Information (not Stage 2 escalation)**

A customer may provide new information in relation to their complaint. If the new information relates to the original complaint then the company may continue to classify the complaint as Stage 1. If the new information is something the company should have been aware of, such as their own literature, action, works or contact to the customer, the company should escalate the complaint to Stage 2.

### **2.8 Contacts not dealt with at end of year**

Where the company does not deal with some complaints at the end of the year, the company is to use one of the following methods:

- The complaint is to be included in the total number of complaints received for the year in which it is received and the response time is also to be included in the same year's information, although it may continue into the following year, **or**
- The complaint is to be included in the total number of complaints received for the year in which it is dealt with and the response time is also to be included in that year's information, although it may have started in the previous year.

Whichever method companies adopt, care should be taken to ensure that undercounting or double counting does not occur and that the method used is consistently applied in subsequent years.

### **2.9 Contacts to companies from CCW**

The purpose of this section is to clarify how companies should report contacts from CCW. To avoid doubt, the recording of complaints received through the appropriate CCW office on behalf of the customer should be recorded.

The channel through which CCW shares information about a customer contact with a company does not necessarily define whether a contact is a complaint. Companies should continue to use procedures already established with CCW. Through its contact with the customer, CCW is well-placed to advise how the customer contact should be recorded. A non-exhaustive list of examples are provided in Table 1.

**Table 1 Contact from CCW**

CCW Action	Company Action
CCW forwards customer complaint letter, email or web form.	Report as formal complaint unless this is a duplicate of one already received by the company.
CCW forwards a phone complaint (for example, by phone or email).	It is assumed the customer would have made some contact with the company already so report as a formal complaint unless stated otherwise by CCW office.
CCW makes a recommended resolution not previously raised by the customer for a complaint which has exhausted the company procedure.	Treat as an enquiry unless CCW advises otherwise;
CCW establish facts from a customer and determines that it has a duty to assist by writing a letter on the customer's behalf.	Report as formal complaint.
CCW establishes facts from a customer; and then determines that it can resolve on customer's behalf with company by phone.	Report as a formal complaint unless otherwise informed by CCW.
CCW forwards a copy of correspondence from a customer to the company which the company has already received.	Do not report as an additional complaint but append to the initial complaint and inform CCW of the proposed outcome for the customer.
CCW requests information/update regarding an existing complaint.	Treat as an enquiry. In the event the company does not respond or does not carry out an agreed action on the complaint, CCW may consider the company has had a reasonable opportunity to resolve the complaint and escalate or investigate the complaint.
CCW requests further information in the form of a pre-investigation letter for a complaint which has exhausted the company procedure.	Treat as an enquiry.
CCW contacts the company to find out at which stage of the company procedure the complaint is.	Treat as an enquiry;
CCW forwards a copy of a letter to a company which advises customers they are eligible to use the ADR service.	Treat as information only.

Where possible, CCW will notify the company of the relevant complaint stage in all correspondence they forward. Complaints which have gone through all stages of a company procedure may lead to a CCW investigation. In cases where CCW already has sufficient information on which to base its investigation, a pre-investigation letter will not be sent.

If a customer raises a complaint about the same issue for which a previous complaint has been raised and it is more than 12 weeks after the date of the previous response, then the complaint should be treated as a new complaint.

### **2.9.1 Long standing complaints**

Customers with a complaint which has exhausted the company procedure and where CCW has been involved after 4 weeks of informing the company (or 8 weeks if the complaint is being investigated) will be given the option to take the complaint to ADR. This will be communicated with the company.

### **2.9.2 Exhausted Complaints (post-escalation)**

If a customer contacts the company, and the company advises the customer that they have exhausted its complaint procedure and refers to CCW (in their final response as well as their complaint leaflet), then all correspondence beyond that advice need not be reported unless it raises significant new issues or new information.

### **2.9.3 CCW investigations**

CCW will investigate a complaint under the following criteria:

- When the company procedure has been exhausted and issues remain that the customer has raised and should be addressed by the company;
- Where there are long standing service failures that the company were aware of but failed to action, this includes a company not responding to repeated points the customer is raising unless it falls under an exemption; or
- Where the company has not correctly escalated a complaint in line with its complaints procedure and CCW would have investigated the complaint if the company had.

In all cases, an investigation must involve a challenge to the company by CCW.

A company may appeal a decision by CCW to investigate a complaint. To ensure consistency, the appeal will be based on whether CCW has correctly adhered to the processes in this guidance rather than the merits of the complaint. Companies should appeal based on the criteria in this guidance.

Companies are not bound by CCW recommendations. CCW will notify customers whose complaints have gone through the company procedure of the option of taking the complaint to ADR for an independent, binding decision on the company. A copy of the notification letter to the customer will be sent to the company.

Following the ADR notification letter, all subsequent contacts on the complaint are not reportable and CCW involvement will cease. For the avoidance of doubt, all written contact prior to the ADR notification is to be reported in accordance with this guidance.

### 3 Exemptions

Companies can exclude from reporting the following:

- E.1 Where the customer cannot be identified by the company (anonymous contacts);
- E.2 Complaints from customers eligible to switch retail provider or in the case of Wales would be eligible to switch (non-household accounts);
- E.3 Contacts from a third party on behalf of the customer which does not have the consent of the account holder or resident of the property, (these should be included once consent is given by the customer);
- E.4 Subsequent contacts received such as through a managed process or where a customer is making a change to previously agreed arrangement (such as an appointment time or payment plan) unless the customer implies or expresses dissatisfaction in line with written and real-time complaint definitions;
- E.5 Any customer contact where the customer is confirming a previously agreed company action;
- E.6 Any repeat or chase complaint made within one working day which the company has not had a chance to respond to the original (excluding auto-response acknowledgements);
- E.7 Any duplicate contact where the customer contacts the water company or contractor about the same issue;
- E.8 Contacts intended for another organisation or about the activities of other companies not working on behalf of the company - for example signage around trenches or road works carried out by another utility company;
- E.9 Calls to automated/IVR lines where a customer hears a recorded message;
- E.10 Developer services complaints;
- E.11 Returned in response to/alongside customer satisfaction survey questionnaires/cards or consultation or research exercises where the outgoing company contact is solely a survey (such complaints could be said to have been initiated by the company and would not have arisen but for a prompt by the company);
- E.12 Not about the services or functions of the company - for example complaints about executive salaries, sponsorship activities and company advertising campaigns and plumbing services;
- E.13 About recreational and amenity activities which are not defined as duties imposed by the Water Act 1989, for example visitor centres at company sites, water skiing and angling;
- E.14 Third party disputes where the company has no legal obligation to become involved or its intervention can have no positive effect (e.g. tenant/landlord or neighbour disputes);
- E.15 Issues on the customer's own pipework or property providing the company can identify this at the time of contact.
- E.16 Repeat complaints where a company has explained to the customer that it will do no more once the complaints process has been exhausted;
- E.17 Telephone enquiries from CCW on behalf of a customer (such as new complaint progression) unless CCW requests the company record the contact as a complaint.
- E.18 Damage or economic compensation claims which are not contained within a written complaint – examples include a bespoke claim form or where a compensation claim form is issued as part of a managed process. Written complaint letters or emails accompanying the claim form should be treated as a written complaint;
- E.19 Received from statutory bodies or authorities acting in accordance with their duties rather than as a customer or customer's representative such as a local authority, DWI, EA who express dissatisfaction on a general issue;



- E.20 Environmental Information Regulation requests, subject access requests or any customer contacts relating to the Data Protection Act 2018 or General Data Protection Regulation, which are not included as part of a complaint;
- E.21 Contacts relating to a complaint after it has reached deadlock which is being considered or going through the ADR scheme, including notification or option letters provided to the company for information by CCW and ADR written contacts / decisions;
- E.22 General comments / opinions on social media including comments on Internet forums;
- E.23 Any complaint that is threatening or abusive to company staff;
- E.24 Any vexatious complaint where it is clear the customer is seeking to aggravate rather than reach resolution;
- E.25 New housing developments where the water company is not a statutory consultee.
- E.26 Part of a legal liability / litigation process and are therefore being handled by solicitors, insurance companies, loss adjusters or other specialist staff (but not where it is part of the company's debt recovery procedure, (for the provision of collecting water and sewerage charges).
- E.27 Where a company's social media platform is not monitored on a 24-hour basis the clock should exclude non-working hours.
- E.28 Contacts where a customer abandons a social media/livechat complaint or refuses to engage with the company.

## 4. Submitting complaint information

Companies are required to submit quarterly complaint performance figures no later than one month following the end of the quarter. Complaint numbers should be provided on all contact channels that are offered.

Whilst the exact detail and format of data returns may be subject to change, companies will be expected to keep records and submit data in the following categories, for all channels that complaints have been raised:

- Informal complaints
- Formal Stage 1 complaints
- Formal Stage 2 complaints

ALL complaints should be recorded under the Billing, Water or Wastewater categories. Whereas CCW had previously categorised some complaints as 'metering', the provision of meter readings by customers should now be recorded as **Billing** with all other contacts related to meters being categorised under **Water**. Complaints that do not obviously align to one of the three categories should be allocated on a 'best fit' basis

In addition, CCW requires a brief written commentary to facilitate its understanding of company performance for its annual complaint handling report. The commentary should include reasons for significant differences in the total numbers or for any individual category.

# Appendix 1

## Definitions applicable to this guidance

- **Customer/Consumer** - any household user of water and sewerage services, including account holders. It also includes representatives, such as CCW, Citizens Advice or solicitors, where they are acting on a customer's behalf. It also includes contacts from people (including local authority staff or non-household customers on behalf of household customers) who may not directly be customers and make contact about services. For example to report a defective manhole cover or a leaking pipe.
- **Identifiable** – where a customer provides their name and one of the following:
  - Address/contact details;
  - Account number;
  - Location of operational works.
- **Social media** – Any social media platform the company makes available for customers to use.
- **Stage 2** - The second stage of a company complaint process that deals with escalated complaints.
- **Managed process** - a process agreed to by the customer and the company to resolve a known issue, **where the customer is not expressing or implying dissatisfaction**. An example of this would be where a customer has called to report a no water incident and the company asks the customer to check with a neighbour to see if they have water and then call back.
- **Abusive** – where a customer is offensive, threatening or using coarse language excessively and directed at company staff.
- **Vexatious complaints**—any complaint received by the company where it can evidence it is without sufficient grounds for resolution and the customer's purpose is to *deliberately cause annoyance*.