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# Customer views on the Guaranteed Standards Scheme

July 2023

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research

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# Foreword



Throughout 2023-24, CCW will be focusing on a new campaign to secure improved service standards, fit for a modern water industry. As part of this work, we wanted to understand customers' views on the current statutory compensation scheme (known as the Guaranteed Standards Scheme - GSS). The GSS is a legal set of standards that all water companies must comply with, failure to meet any of these standards, could result in customers' being entitled to a payment.

Set up in 2001, GSS has seen little change over the last twenty years; either to the payments to customers or the standards themselves. Given the changes that have taken place over the last two decades, within the water industry, the wider economy, and in consumers' expectations, we have concerns that GSS no longer adequately supports customers or reflects the impact incidents have on those who experience poor service.

Through this research, we have gained the insights of customers about what they expect to see as part of a modern standards scheme to ensure we target where changes need to be made. The testing included proposed new service failure payment levels, to see if they appeared reasonable to people, and whether they met their expectations.

A common theme of the research findings was that awareness of the GSS is very low among all consumers, even those that owned water-critical businesses. This led to cynicism, with people questioning why they were not aware of the service standard, or that they were entitled to payments for service failures. At a time when trust in water companies is falling, more could – and should – be done to inform people about what they can expect from their water company and what they are entitled to when things go wrong.

Many customers who took part in this research assumed, incorrectly, that they have no recourse to compensation: their perceptions of their water companies might improve if they knew more about the scheme.

Overall, our research reinforces the need for a new and improved GSS to meet customers' expectations, with standards and compensation levels driven by what people think is both relevant and fair.

We will be working with Ofwat and water companies to develop a GSS that is truly fit for today and the future and reflects fair payments when companies fail to provide a good service to their customers.



A young child with curly hair is shown in profile, drinking water from a clear glass. The child is wearing a checkered shirt. The background is a blurred indoor setting. A large, semi-transparent 'ccw' logo is overlaid on the right side of the image.

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# Background, objectives & methodology

# Research background & objectives

**CCW are working on their Forward Programme for 2023/24. This includes a new campaign to secure updated standards of service for a modern water industry. This work will focus on the GSS (Guaranteed Standards Scheme), which provides payments to customers where their water companies do not meet certain standards.**

One of the problems that has been identified is a lack of ability from the industry to respond to new expectations. Specifically, there has been no increase in levels of payments or standards since 2001. As a part of addressing this issue, CCW want to propose new standards to the sector.

CCW commissioned this research to explore customer perceptions of the current standards and compensation levels, and to provide customer-backed evidence that new standards and compensation levels proposed to the sector are credible.

## Key objectives of this research

Understand bill payer's views on:

- The current Guaranteed Standards Scheme, including identifying any gaps
- The appropriate minimum levels of compensation for different service failures
- Whether different service standards should apply for customers who are in vulnerable circumstances/have been identified as needing extra help, including those on Priority Service Registers

# Methodology

**A qualitative methodology was needed to explore water consumer attitudes in the depth required.**

A mixture of focus groups and depth interviews were conducted, to fully explore all the standards.

Group discussions allowed a full exploration of the standards, and encouraged debate and discovery.

Shorter depth interviews allowed us to reach audiences for whom focus groups would not be appropriate, but still needed to be represented in the research.

**Fieldwork took place between 27th February – 22nd March 2023.**

Audience	Method type	Number of interviews
Household customers	Mixture of face-to-face & online groups	11 groups
Priority Service Register (PSR) customers	Mixture of telephone & Zoom video depths	5 depths
Micro & small businesses	Online groups	2 groups
Medium & large businesses	Zoom video depths	8 depths

**In total, we spoke to 104 bill payers and water consumers in England & Wales.**

# Household consumers: specification

## Household consumers

Face to face groups were conducted across England and Wales, ensuring a geographic split. Further online groups were also commissioned, with participants from a range of locations. Groups were 2 hours long.

Location	Age	Family stage
Bristol	40+	Mix of family living at home & post-family/empty nesters
London		
Powys		
Online x 2		
Solihull	Up to 40	Mix of family & pre-family
Cardiff		
Leeds		
Online x 2		
Online	Mix	Mix

- Eight participants per group recruited
- Mix of genders (maximum six of any gender per group)
- Mix of ethnicities (maximum of six of any ethnicity per group, excluding Powys)
- At least six per group had either sole or joint responsibility for paying bills
- ‘Digitally excluded’ participants, i.e., those not confident online/had limited access to online services, were recruited in Bristol, London, Powys and Cardiff.

## PSR consumers

Five depth interviews were conducted with consumers on the Priority Services Register, either by phone or video call per participant preference. No quotas were set, beyond being on a Priority Services Register.

Interviews were 45 minutes long.



# Business consumers: specification

## Micro & small business consumers

**Two online focus groups were held with owners/employees of micro and small businesses.**

All had some responsibility in their role for paying the water bill or dealing with their water supplier.

One group working in 'water critical' businesses (i.e., where water is a key component of the product/service). One group did not have any water critical sectors.

Groups were two hours long.

- Eight participants per group recruited
- Mix of sector types (minimum three x service, three x manufacturing per group)
- Mix of locations (minimum one participant from Wales, North, Midlands, South per group)
- Mix of business size (minimum three x each micro (employ 0 – 9) and small (employ 10-49) businesses)

## Medium & large business consumers

**Eight video interviews were conducted with participants who worked in medium or large businesses.**

All had some responsibility in their role for paying the water bill or dealing with their water supplier.

Interviews were 45 minutes long.

- Mix of water critical and non-water critical (minimum two x water critical)
- Mix of sector types (minimum two x service, two x manufacturing)
- Mix of locations (minimum one each from Wales, North, Midlands, South)
- Mix of business size (four x medium, employing 50 – 249, four x large, employing 250+)



# Understanding this report: language used to describe participant groups

## 'Customers'

For this research, we interviewed a range of people in England and Wales. Participants had mixed levels of responsibility for paying bills (i.e., sole, joint, not specified), and some managed bills for water consumed by others (e.g., managing and paying bills on behalf of businesses, or used water within their household). For simplicity of language in this report, we have referred to all as 'customers' throughout.

## 'HH Customers'

Throughout the body of this report, household customers may be abbreviated to 'HH customers'. This includes both 'general' household and PSR customers.

Where there is a difference between general household participants and PSR participants, this is clearly indicated in the text.

For verbatim quotes, 'HH' refers to general household participants, while 'PSR' refers to those from the Priority Services Register.

## 'NHH Customers'

Business customers may be referred to as 'non-household customers', abbreviated to 'NHH customers'. Generally, this includes both large and small businesses, and both water-critical and non-water critical businesses.

Where there are differences between large and small, or between water-critical and non-water critical businesses, this is clearly indicated in the text.

# Customer differences: household vs. non-household

**Overwhelmingly, HH and NHH groups had very similar attitudes throughout the research.**

The discussions were led to cover the same points for both customer types, with the only significant differences being NHH interviews which did not review proposed payments for standards, or investigate having different amounts of compensation for customers on the PSR.

Where there are differences, these have been highlighted. See right for summary.

Generally, NHH customers were not aware they had any choice in provider of customer services/billing.

Making appointments: somewhat less important for NHH customers, as if appointments are in business hours, this is 'built into' their working day anyway, lessening inconvenience.

**Keeping appointments:** current payment feels very low, especially if NHH customers would have to pursue it in work time. The time spent on the admin would 'cost' the company more than this amount.

Proposed payments suggested were significantly higher than those proposed by CCW, as they were looking to cover their 'day cost' if any revenue was missed due to a vital appointment not happening, especially if the appointment was to restore supply for example.

**Account queries:** again linked to time-cost of admin needed to 'chase' non-responsive water companies. Longer delays should result in higher payments in line with increased delays.

**Low pressure:** some water-critical businesses felt this was a key standard, as it may have significant impacts on day-to-day operations, however this was not universal due to a lack of understanding around the potential impact.

**Flooding:** suggested payments swayed significantly towards needing to cover damages.



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# Service & standards expectations



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## Service

- What is service?
- What does good service look like?
- What are the service expectations of utilities companies?
- What are the service expectations of water companies?



# 'Service' means companies deliver their promises, both for customer service & service delivery

When thinking broadly about 'service', participants had a variety of interpretations. Some were more focused on customer service and customer experience, while some thought more about service delivery.

- However, the unifying theme is that **customers see service as the promise that companies have made to them**, whether that be providing reliable WIFI or getting a coffee order right.
- This means that **when a service is not as expected, companies have broken their promise to the customer, and should try and put it right.** This accountability / transparency when things go wrong, and then making appropriate amends, is a key component of good service.

"Any kind of service just means companies doing what they say they will. It's not hard. Well, it shouldn't be hard."

HH customer

"Service is just what the company gives you, for the cash you give them, I think it's simple. Doesn't matter if it's customer service or your mobile phone, if they say you'll get a service, that's what should happen."

HH customer

"You technically enter into a contract with the supplier, so, there should be a level of service that comes with that. It's almost a given."

NHH customer



# Good service delivery means consistency & reliability; good customer service is feeling valued

## Service delivery expectations:

- Companies do what they're supposed to do, e.g., supermarkets have food available to buy
- Heightened when a company is providing service that has already been paid for, e.g., appropriate mobile phone coverage
- Some acknowledgement that there might be interruptions in service delivery, especially for things that are practical in nature. However, even then issues need to be infrequent and solved quickly.

## Customer service expectations:

- Centring customers in exchanges
- Being available and efficient when communicating, e.g., companies being contactable in a variety of ways including via chat box or in person, customers not having to repeat themselves to multiple parties
- Being proactive and responding to individual needs, e.g., suggesting tailored solutions, personal recommendations
- Getting good customer service should be a given; there's no excuse for poor customer service.

"If I've paid for something, I'm entitled to it. I understand that problems happen, but if a company isn't doing what they say they will, they're not actually providing a service."

**HH customer**

"I understand that issues happen. As long as it's not a habit, and they apologise, I can forgive them."

**NHH customer**

"There's no excuse for rudeness!"

**HH customer**

"If I'm a paying customer, I should be treated like one. Not like an inconvenience."

**NHH customer**

"When I phone, I expect to get through to a human. I don't want to be kept on hold for hours. I appreciate they are busy but, not being funny, get more staff."

**PSR customer**

# Supply reliability & proactive communication of issues are the main service expectations of utilities

Consistent supply is essential & expected from all utilities



Supply interruptions must be communicated clearly & fixed quickly



These expectations are greater for water companies than other utility providers

Providing an **uninterrupted service** is the key expectation customers have of utilities companies.

It's the main thing they offer, so providing the supply is the bare minimum in terms of service expectations.

This is even more important for businesses, who cannot operate without key utilities.

**Customers don't expect to have to think about if they'll have a supply.**

**Communicating any supply issues** is therefore another key expectation of utilities providers.

If a company cannot provide the promised supply, they **need to let customers know in advance** for known stoppages, and **keep them updated** through the interruption, especially if advance warning was not possible.

**Customers need to be able to plan to be without their utility, if they must be without it.**

**No utility is 'fine' to be without, but being without water is unacceptable for customers. Several factors contribute to this:**

- **Limited water supply has a tangible, immediate impact.**  
Water access has a direct impact on hygiene and hydration, so an interrupted supply is felt physically and quickly. Due to this, some feel strongly that **access to running water is a right.**
- Further to this, consumers have **no choice in their water supplier**, and no alternative when service problems result in this 'right' being taken away, which **results in very low tolerances for issues.**
- **Customers are not used to being without water.**  
No utility is expected to be cut off, but many have experienced power cuts/blackouts, and even more have experienced poor internet. Having access to no running water is less frequently experienced.

# There are also secondary expectations of utilities companies, relating to non-supply matters

## Respect customers

- Customers feel utilities providers need to understand the privileged position they are in.
- Customers cannot 'opt out' of utilities, so interactions with the company should reflect the necessity of the service they are providing.
- A key part of this is **billing fairly and correctly**, especially in light of the cost-of-living crisis and record profits for some utility companies.
- Very important for water companies, as HH customers cannot switch providers, if they feel they aren't getting value for money, as with other utilities.

## Be contactable

- Most anticipate not needing to talk to customer service unless there is an issue. Therefore, when customers do have to talk to their utility provider, they need to be able to **get in contact in a reasonable timeframe**, in a way which suits them.
- When contacting customer service, interactions need to be **empathetic and individualised**, so customers feel listened to, and reassured their problems will be addressed.
- This is equally important for all utilities.

## Take responsibility

- Companies need to take responsibility for the area they operate in. This means **investing and adding value to the sector**.
- Water companies are top of consideration due to the ongoing news coverage around sewage spills from storm overflows into rivers and beaches.
- Customers want water companies to proactively manage leaks, improve their infrastructure, and respect the environment.

# The main service expectation customers have of water companies is to consistently provide water

Areas relating to immediate provision of water

(non-negotiable, basic needs)

Customer service

(not needed often, but crucial when it is needed)

'Future-gazing' of the water supply & environment

(low immediate need but rising expectations)

SERVICE EXPECTATIONS

**Provision of water is the main service expectation customers have of water companies.**

## Core service expectations:

- Provide clean, safe, drinking water, that is available all the time
- Have proactive messaging if there must be an interruption
  - Felt particularly keenly for water-critical businesses, who expect weeks if not months of notice for planned interruptions to supply
- Appropriate fresh-water provision for drinking and washing in event of not having running water, and fixing supply issues quickly.

# Expectations of customer services are somewhat secondary, due to infrequency of contact

Areas relating to immediate provision of water

(non-negotiable, basic needs)

Customer service

(not needed often, but crucial when it is needed)

'Future-gazing' of the water supply & environment

(low immediate need but rising expectations)

SERVICE EXPECTATIONS

Customers do not expect to have to engage with customer service from their water company; they expect the water will always be on, so the perceived need is limited.

When they do have to get in touch, they expect to be able to do so easily, and be treated well.

### Secondary service expectations:

- Bill fairly and accurately
- Be contactable in a variety of ways, including email, phone – including being able to talk to someone in person – and chat pop-up on company website
- Resolve issues quickly (non-supply related)



# Fewer service expectations around environmental issues, as these do not have an immediate impact

Areas relating to immediate provision of water  
(non-negotiable, basic needs)

Customer service  
(not needed often, but crucial when it is needed)

‘Future-gazing’ of the water supply & environment  
(low immediate need but rising expectations)



**Environmental-related expectations are things that water companies ‘should’ be doing, rather than what customers think is currently happening.**

### **Discretionary service expectations:**

- Cause minimal negative environmental damage, including not dumping waste into rivers and seas
- Top of mind due to news
- Also feels linked with climate change, an issue which many feel will become more significant for water companies in the future



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# Standards for service delivery

- Why are standards important for water companies?
- What standards are water companies expected to have?



# While customers are positive about the idea of standards, their implementation is questioned

There are strong feelings that it's 'right' that water companies have standards they have to meet. These standards should be designed to ensure that a minimum level of service is delivered, and to protect customers from poor experiences.

Having standards to meet is especially important given:

- The vital nature of water supply
- Customers have no choice in their water supplier, and cannot go elsewhere if their experience is poor

However, there is a degree of cynicism from customers towards the idea that water companies have standards to meet. There are many unanswered questions, specifically concerning accountability:

- Who sets the standards?
- How is adherence to standards measured? Who is enforcing them?
- What's the consequence for water companies who breach their standards?
- What's the consequence for repeated instances of standard breaches?

So, while standards are expected, some customers are sceptical that they are ever enforced.

"I'd be shocked if they didn't have internal standards to meet. I'd also be shocked if they didn't move the goalposts when it suited them."

**NHH customer**

"Who's policing the police?"

**PRS customer**

"You do expect them to have standards to meet, of course. But it's not like they're competing with anyone else for your money, so what difference does it make if they don't meet their own standards?"

**HH customer**

# The standards that customers expect water companies have to meet mainly relate to supply

Water-specific standards are expected, as this is fundamentally linked to the key service delivery. They are not expected to have 'customer service' related standards to meet – despite this being a *service* expectation.

'Water' related standards are anticipated

- Supplying water is their key deliverable; without this, they are not providing their service, so **customers expect standards to be in place to ensure water companies provide this service properly.**
- This can extend to bigger-picture, environmental expectations. News headlines about water companies facing fines inform expectations of environmental standards and anything relating to health is imagined to be standardised.

Customer service standards are not expected...

- **Some perceive there to be a limited link between supply and 'customer service',** meaning some feel there may be less 'need' for customer service standards.
- Further to this, many have infrequent contact with their water suppliers, so don't know what actions relating to customer service water companies might have standardised.
- Many report poor experiences with other utilities customer services in the past, resulting in lower expectations due to previous disappointments.

...but they are wanted

- While customers do not expect customer service standards, they would still **prefer for water companies to have them**, to hold them to account.
- **Some customers might benefit from customer service standards:**
  - **Business customers**, who might have more need to contact customer service – especially those in water-critical businesses.
  - **Vulnerable customers** who might need adapted communications or additional help, e.g., digitally excluded, disabled, English not a first language.

# Expectations of services & standards do not exactly align; standards are imagined to be lower

Customer context & assumptions lead to expected standards	Implication for companies	Impact on standard expectations
Standards will be very basic factors, relating to the minimum levels needed to conduct business	Meeting standards will require no additional effort for companies, as they're already doing the work	Supply standards are therefore expected – they're already doing this, as supply delivery is key to business operations
Standards are designed to be able to be met by companies	Internal processes are easier to manage, so it makes sense for standards to relate to these, as they are easier to meet	Customer service standards rely on external factors for satisfaction, are therefore harder to meet, and will not be set
Measurable company standards are expected to be numbers-driven	Customer service success is more to do with 'feelings', not just 'facts', and doesn't feel as easily quantifiable	It's more difficult for participants to know how they would measure customer service standards for water companies
Most have limited experience with the customer service of their water company	They have few ideas about what kinds of experience they might expect from companies	Customer service standards are harder for customers to imagine, they cannot give examples and therefore their expectations are more limited

- There is a gap between what customers expect in terms of services from their water company, and what they think companies will have set as standards.
- This is mainly to do with customer service standard expectations – most do not imagine that water companies have customer service standards to meet.



# Water supply standards are expected; customer experience standards are not, despite good customer service being an expectation

Service expectation	Area	Is a standard expected?	Why?
Provide clean, safe, drinking water, that is available all the time	Water supply	Yes	<ul style="list-style-type: none"> <li>• Seen as a key service deliverable, with physical ramifications if not met</li> <li>• Standards should be in place to ensure water companies have to comply to these services.</li> </ul>
Have proactive messaging if there must be an interruption		Yes	
Appropriate fresh water provision in event of not having running water, and fixing supply issues quickly ('appropriate' can differ dependent on needs)		Yes	
Bill fairly and accurately	Customer service	Sometimes	<ul style="list-style-type: none"> <li>• Negative impressions of energy companies make some cynical that fair standards exist for billing</li> <li>• Some feel it will be regulated by Ofwat</li> <li>• Difficult to think of what kinds of customer service might be able to be standardised, given the infrequency of contact with water companies</li> <li>• Difficult to quantify – more of a 'feeling' than a 'fact'</li> </ul>
Be contactable in a variety of ways, including email, phone and chat pop-up on company website		No	
Resolve issues quickly (non-supply related)		No	
Cause minimal negative environmental damage, including not dumping waste into rivers and seas	Water supply	Yes	<ul style="list-style-type: none"> <li>• Directly related to water supply/quality</li> <li>• Fines etc. heard about in the news strengthen expectations that this will be a standard water companies have to meet</li> </ul>

A large, stylized, light blue 'CCW' logo is positioned in the background on the right side of the slide. It is rendered in a thick, rounded, cursive font, appearing to have a slight 3D effect with a darker blue shadow underneath.

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# Response to the Guaranteed Standards Scheme

# Introduction of the Guaranteed Standards Scheme

**Moderators read the following paragraph out loud in all interviews, to introduce the concept of the GSS.**

This paragraph was provided by CCW, to ensure consistency of understanding across interviews.

## **Explanation presented to participants:**

"All customers of water and sewerage companies are entitled to guaranteed minimum standards of service, as laid down by the Government. These rights are known as the Guaranteed Standards Scheme (GSS). Where a company fails to meet any of these standards of service then it must make a specified payment to the affected customer.

Some companies can choose to do more, but these are the legal minimum they are required to do."

# There is minimal existing knowledge of the GSS; when introduced, the idea is met with some cynicism

Customers like to be 'in the know' of what they are entitled to from the companies they receive services from – very few were aware of the GSS. Being introduced to the Guaranteed Standards Scheme led some customers to question why they had not previously been aware of it, which drove some initial cynicism.

## Low levels of awareness:

- **Almost all were surprised to hear about the Guaranteed Standards Scheme; awareness of them was very low.** This included water-critical businesses, e.g., leisure centres.
- Even customers who claim to **have received payments** from their water company previously were **not aware** of the GSS as a concept.

## Factors driving cynicism:

- Some felt that water companies were **deliberately 'not publicising the standards properly'**, leading to low awareness. This was heightened in groups, where participants could see others who were also unaware of them.
- *'Are they trying to get out of paying us by not telling us they exist?'*
- **Customers assumed the GSS would be similar to other utility 'standards' that they have low expectations of**, e.g., broadband providers making payments for low WIFI speeds.

*'It's a hollow promise from BT, they've never paid me a penny, so I guess it's the same from Thames Water.'*

- Some driven by recent, poor environmental press around water company behaviour and sewage spills.

*'They're hardly going to protect us as customers if they're not even doing what the government says about dumping waste into our rivers.'*

# Customers feel standards should cover all areas relating to supply, and some relating to service

Standards should protect the 'core' offering of clean, consistent water supply. Therefore, customers feel the minimum legal standards they are entitled to should focus on these areas.

While customer service standards are not expected from water companies, they are desired. Therefore, with the new knowledge that minimum legal standards exist for all water companies, customer service standards become things that there 'should' be.

What kind of services should be included on the list for these minimum service standard payments?

**MORE EXPECTED**

**LESS EXPECTED**

## Supply

- Standards to protect customer rights to consistency of supply
- Safety and cleanliness of supply
- Including provision of fresh water if supply is interrupted

## Environment

- Non-safety water quality, e.g., hard/soft water levels, mineral content, taste
- Responsibility of waste management

## Customer experience

- Customer service standards relating to contact times, answering queries within specific timeframes
- Some suggested charging a fair price should also be included, however this was not universal



# GSS list: presented to participants for first impressions

1. Appointments not made properly

2. Appointments not kept

3. Written account queries and requests to change payment arrangements not actioned on time

4. Written complaints not actioned on time

5. Incorrect notice of interruption to supply

6. Supply not restored – initial period

7. Supply not restored: each further 24 hours

8. Low pressure

9. Flooding from sewers: internal

10. Flooding from sewers: external

# Initial response to the GSS was broadly positive with more standards than expected

Customers were generally surprised and pleased by the quantity and broadness of the standards. Some continued to be sceptical due to pre-existing cynicism of the utility industry and unfamiliarity of GSS, however most first impressions were positive, even from those who had been very cynical beforehand.

## Positive first impressions:

- More standards than expected
- More customer service-centric than expected, received particularly well due to low expectations of all utilities companies including water
- Low pressure a surprise to see and very exciting for those who feel they have had issues with this in the past

## Some still wary:

- Continued questions around who enforces these
- Some questions around priority – customer service standards shouldn't interfere with supply standards
- High number of standards might mean lots of compensation is being paid out – will this impact their bill?
- Perception that water quality/cleanliness standards are missing

“Low pressure is amazing to see, how do I go about claiming that one?!”

**HH customer**

“Yeah, it's a lot more than I expected to see. It's promising.”

**NHH customer**

“There's more ones about 'customer' things than I expected. That's fine, as long as they don't just focus on those and still keep up the supply.”

**PSR customer**



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reviewed

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# Review of standards: method

**All standards were covered in every interview/group. The standards were reviewed in a way which mitigated potential issues of fatigue and over-complication, and to ensure best relevancy to the participant(s) in question.**

## **Standards were cycled through across interviews.**

- The order in which the standards were introduced varied across interviews. Varying which standards were reviewed first and last ensured fatigue or time constraints did not impact the same standards each time, allowing for all standards to be covered equally.

## **The focus was on the standard, not the exceptions.**

- For review, participants were presented with the current conditions of standards only. Exceptions were introduced where they became a key discussion point, e.g., an exception would fundamentally change the interpretation of the standard. This was led by moderators; not all exceptions were discussed.

## **Some wording shortened from the full standard.**

- In some instances, standards were shortened for length or had formatting amended slightly for clarity. None of these amendments had a meaningful impact on the meaning of the standard. Standards as presented have been included in this report. Moderators had full standards at hand to clarify if an issue of formatting was raised.

## **Current payments discussed by all; CCW proposed payments discussed only in HH interviews.**

- The current payment amounts were reviewed by all. HH interviews reviewed the residential payment, NHH the business customer payment. CCW's proposed payments were only reviewed in HH interviews, as no NHH proposed payments were available.

# Impact on customers is the main thing participants use to assess the standards & payments

Bigger impacts for customers should result in bigger payments

Payment amounts should reflect the impact that standard non-compliance has had on the customer; payments should be higher if the impact on the customer is higher.

## Factors considered when assessing impact:

- If the issue is potentially persistent/recurrent without intervention from the water company
- The significance of the issue

There is also a range of impact types, which further affects how fair amounts feel

As the standards cover such a range of issues, the types of impact that customers might experience are wide-ranging, from wasted time to property damage.

Different types of impact require different levels of compensation. Some standard breaches also result in multiple types of impact.

## Types of impact considered:

- Lifestyle (e.g., having time wasted, limited access to water at certain times)
- Financial (e.g., issues with bills, paying for flood damage, lost earnings)
- Physical (e.g., limited access to water at key times, flooding)
- Emotional (e.g., stress as a result of complaints process, issues with bills)

# However, there is limited context for how 'fair' payments are before reviewing the standards

**Due to the low awareness of the standards, and limited experience of claiming compensation from water companies, participants struggled to anticipate what level of payments they might expect to see.**

- Initially, this meant that some were happy with the idea that they would receive any amount, as they did not know these payments existed previously.
- As interviews progressed through the standards, the compensation amounts that participants reviewed were then used as anchors to understand the 'fairness' of other standard payments.
  - **Note:** the exception for this were standards 9 and 10, relating to sewer flooding, which are being anchored against participant ideas of insurance pay-outs..

- This increased awareness of compensation amounts also changed what some participants felt 'entitled' to, as they were able to benchmark their expectations based on their new knowledge of payments for standards.
- This was particularly clear when reviewing 'low pressure'. The perceived minimal impact of low pressure, plus the payment being higher than the amount for missed appointments (felt to be more impactful) means that £75 can become the 'default' minimum payment for all standards.
- This is potentially reflective of the 'real life' experience of looking at payment amounts for standards. Often presented in in a grid or list, anyone looking at the standards will be able to compare payment amounts between standards.

**Note:** anticipated source of increased amounts impacts attitudes to proposed amounts

Generally, participants who were shown proposed payments did benchmark them against the current payments, and did not call for significant increases (excluding standards 9 and 10, relating to sewer flooding). This was in part rationalised by them being concerned about the impact that increases might have on their bills, in addition to the anchoring against current amounts.

However, in one group, participants were told that increases would be taken from company profit by a CCW member of staff as a part of the discussion, learning that increases would not be passed on to customers.

After discovering this, participant entitlement in this group increased, and they felt that they should receive significantly more per standard.



# There is confusion around the purpose of the payments, & what the role they are fulfilling

Participants did not come to a clear understanding about what exactly the payments were 'supposed to do'.

Due to the different kinds of impact, both in terms of **potential severity and nature of impact**, payments can be seen as potentially fulfilling a range of purposes:

- Payments as a goodwill or '**sorry to the customer**' payment, for any **inconvenience caused** by the company.
- Payments that are high enough to be **punitive to companies**, in order to inspire timely action.

- Some are expected to be **compensatory when there is a direct financial impact** from the standard not being met.

Surprise that the payments existed in the first instance also contributed to this confusion – being unable to benchmark amounts meant they also, couldn't anticipate what the payments were designed to cover.

This results in current payment amounts that feel too low are justified as being not 'fit for purpose' – however, **the purpose of the payment does somewhat vary by standard.**

"If they breach a standard, they need to pay up to say sorry."

**HH customer**

"Payments need to be high enough to make sure that companies are held to account. There's no point having pennies as compensation for customers, because then there's no incentive [for the water company] to do the right thing."

**NHH customer**

"So are payments a goodwill thing, or to cover the costs you rack up?"

**HH customer**

# Severity and type of impact affects how payments are understood and how fair the amounts feel

- All payments are seen to be, at least in part, an apology to the customer, and a deterrent to the company.
- Not all payments are compensatory, as they do not all have a direct financial impact on the customers. Some can become compensatory depending on the individual circumstances. In these instances, there are calls for additional amounts to be made available, depending on costs customers incur.

Standard	Main reason for payment	Other factors that might mean additional amount should be due
Appointments not made properly / not kept	Inconvenience caused, and incentives for companies to do better	
Written account queries and requests to change payment arrangements not actioned on time		Becomes compensatory if charges are incurred due to unmet standard
Written complaints not actioned on time		Becomes compensatory in relation to emotional impact regarding nature of complaint
Incorrect notice of interruption to supply	Reimbursing potential expenses incurred	
Supply not restored – initial period / each further 24 hours		
Low pressure	Inconvenience caused	Becomes compensatory if customer suffers financially due to unmet standard
Flooding from sewers – internal / external	Directly related to damages, so like for like reimbursement expected	

# Review of standards: overall themes

There are some universal themes that are present across all standards.

Universal themes relating to how standards are perceived:

## Impact informs relevancy:

The greater the potential impact is if a company does not meet the standard, the more relevant the standard feels.

The perceived frequency of issues, the number of people affected, or significance of issue feed into this.

## Many customers think not just about themselves, but the impact of standard breaches on others:

Across fieldwork, participants were aware of not just their individual circumstances, but others as well. Household groups in particular discussed customers who may be vulnerable, including those with additional needs,

those who may struggle to access the internet, and those who are financially vulnerable.

All standards were assessed with different demographics in mind.

## Customers want the standards to be fair – not just 'equally' applied to all:

Some are aware they will need less from a standard than another group of people. In these instances, additional help being offered to certain groups makes sense, and is what customers want companies to do.

## Most look to balance their own needs as customers with the realistic needs of water companies:

There is an understanding that standards have to be reasonable. Many are wary of holding companies to overly strict standards. This is to ensure that:

- Overly high standards do not result in reduced performance or 'meaningless' target-meeting.
- Companies do not have to pay out excessive amounts of compensation, which some fear will have a negative impact on their bills (see next page).

# Review of standards: overall themes

There are some universal themes that are present across all standards. Universal themes relating to payment:

## **Payment mechanics are not understood.**

Customers do not understand 'how' the payments work. How are payments made 'automatically'? Who is responsible for reporting when a standard is not met? What is the process for reporting? How is payment delivered (e.g., money off bill, cash)?

## **There is concern that increased payments for standard failures will mean increased bills.**

Most assume that increasing payment amounts will result in higher future bills.

Customers want transparency about where the money for these payments comes from.

## **Futureproofing appropriate amounts feels impossible.**

When thinking about what amounts might be appropriate for the future, most customers are unwilling or unable to commit to fixed figures. The context of inflation and the cost of living crisis means that customers cannot anticipate what the financial future might look like, both for themselves and others. To futureproof payments, many want increases to be automatic, e.g., linked

To futureproof payments, many want increases to be automatic, e.g., linked to increases in inflation or a price index. If this is not possible, customers want amounts to be regularly, manually reviewed.

## **Vulnerable customers should not necessarily receive 'more' compensation automatically.**

Generally, participants wanted customers in vulnerable circumstances to receive additional help in relation to specific standards – not different payment amounts.

# 1. Making appointments: appointments not made properly

The idea was received well, however there was confusion around what the standard meant in practice, which limited relevance for some.

- Can feel very relevant to customers who are consistently frustrated with companies who are less specific about their appointment times. Some reported 12-hour appointment windows, which are really inconvenient and frustrating for customers.
- Some did not understand how the service standard was supposed to work in practice, so struggled to understand the impact it would have on them. This limited the relevancy it had for them.

## Standard as presented to participants:

### “Appointments not made properly.

If an appointment is made with a customer, the company must give notice to the customer that its representative will visit during the morning or the afternoon.

The company must also specify to the customer the times it considers to be the morning or afternoon.

If requested by the customer, the company must give notice to the customer that its representative will visit within a specified two-hour time slot.

If the company fails to do any of the above, it must automatically make a GSS payment.

# Availability of morning or afternoon appointments helps customers mitigate disruption of their day

## Key positives:

- **Helps customers plan effectively, minimising the disruption that appointments cause.** Good that a morning or afternoon will be specified, and that the timeframes of each will be clear.
- **Being able to get a two-hour timeslot is surprising but appreciated.** Some felt this was 'unheard' of in a world where delivery/appointment slots are 'between 8am and 8pm' (notably internet providers suffer from this).

- Those with vulnerable relatives praised this standard on their behalf.
- It could help with **safeguarding** by allowing them to plan to have someone else in.
- It was also mentioned this could benefit those with mental health conditions, especially anxiety, as they can better **prepare for appointments** and reduce variables in their routines.

"Bit silly they have to say what the 'afternoon' is, but some people think the morning is up until 1pm nowadays, so this should clear up any confusion."

**PSR customer**

"There's nothing as annoying as being told to wait in from 8am until 8pm, it's ridiculous in this day and age. I had no idea water companies are ahead of the curve!"

**HH customer**



# Inconsistent understanding of how the standard works can limit perception of relevancy

## Points for consideration:

**Not consistently understood**, with some confusion around what this standard means practically. Questions included:

- Is it about the company making the appointment with the customer, or the customer making the appointment with the company?
- What is the difference between this and 'keeping appointments'?
- What does it mean in practice?

- Customers are sometimes **less able to understand how not meeting this standard might impact their lives**, versus other standards which were more immediately and obviously applicable. This meant that for some, there was limited relevancy.
- This standard feels less applicable to NHH customers; as long as the visit is within working hours, the morning/afternoon differentiation matters less.

"I don't really understand how it works. Who's making the appointment in the first place? Us or them? I can't see how it'd affect me personally."

**HH customer**

"I'm at home all the time, so it's not really an issue for me. But it'd be good for families probably."

**PSR customer**

"This isn't relevant for me, as long as it's within working hours, there's someone here. But as a private customer, I think this is great."

**NHH customer**

# Desired updates relate to improving the accessibility of a shorter time-slot

## Development & improvements:

- **Having the right to request a shorter timeslot is only helpful if you know that option is available.** Given the low levels of knowledge around the standards, customers feel this **needs to be proactively** offered to all, rather than just able to be requested by those 'in the know'.
- As a minimum, this needs to be **actively offered to vulnerable customers**, who might have other appointments or needs to manage.

## Detailed discussion: two-hour slots as default

Many felt that the two-hour slot should be the default for all, however this was not universal and was a point of discussion in the groups:

- Not everyone would benefit from a shorter appointment window, and customers do not want to put unnecessary stress on water companies or engineers, especially given the potential complexity of appointments.
- Some were concerned a too-tight standard could result in worse service, as engineers rush

appointments to make it to their next one, or even skip ones that are not achievable in the shorter slot.

- This is a key area where the 'making' and 'keeping' appointments standards inform each other.

Some suggested an alternative way of managing appointment times could be by being able to request 'times to avoid', rather than 'times to arrive' (e.g., ability to avoid school pick up times in the afternoon slots).



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## There is also a desire for more clarity around standard specifics and payments

### Development & improvements:

- **More clarity is wanted** to help customers understand how the standard works, so they can identify if they might be due a payment or not.
- **Transparency around the 'automatic' payment also looked for**, with customers looking to understand what the reporting system is between customer / engineer/ company for these instances.

# As the standard is so unexpected, any level of payout is welcomed

## Response to the current payment:

- As the standard is so unexpected to see, and other companies are known to behave so badly around appointment windows, any payment relating to this is a 'bonus'.
- Just the fact that the standard exists is good enough for some.
- Generally, those who wanted more had conflated it with 'keeping appointments'. Once it was understood that this issue was covered by a different standard, the amount was felt to be fine.

## Response to proposed payment:

- Positive response regarding the increased amount, as any payment for this is already a 'nice to have'.
- More clarity was still wanted on exactly what kind of scenario would qualify them for the payment.
- Main points around increases in the future are linked to amounts reflecting inflation.

"This is just a bonus payment for me, I didn't expect to see it at all. I'm more used to be fined by a company if I'm not in!"

**HH customer**

"It'd be good to know what it actually means, practically."

**HH customer**

## Minimum payments

	Current	Proposed
<b>HH</b>	£20	£30
<b>NHH</b>	£20	

# Making appointments: summary

## Relevancy

- Unexpected standard, given low expectations of companies, so relevancy not immediately clear for all
- Most relevant for those who have to plan their days more, e.g., working shifts, managing households or childcare
- Felt somewhat less relevant for those who expect to be at home or work for all day, however these customers still saw value in it for others

## Updates

- Ensure customers are able to access shorter time slots if needed, by offering them out rather than putting the onus on the customer to request

## Payment

- Current payment amount felt to be acceptable, due to the surprising nature of the standard being included in the first instance
- Proposed payment felt to be an appropriate rise, however more clarity is needed on how to claim/receive the payment if necessitated

## 2. Keeping appointments: appointments not kept

**Companies missing appointments is a known and frustrating issue, meaning a standard which addresses this feels very relevant.**

- Feels most relevant to customers who will be the most inconvenienced by appointments being missed, due to having to take time off work, change work/childcare arrangements, etc.
- Less directly relevant feeling for those who are very flexible, e.g., those who work from home all the time or are retired; however, it is still an appreciated standard.
- Somewhat less directly relevant for business customers, who can expect to be visited within their business hours. It feels more relevant for them as individuals.

**Standard as presented to participants:**

**“Appointments not kept.**

**A GSS payment must be made automatically if an appointment is not kept because:**

- the company representative did not visit on the appointed day;
- the company representative did not visit during the morning or the afternoon (in accordance with the appointed time specified);
- the company representative did not visit within the appointed 2-hour time slot;

**or**

- the company cancelled the appointment but did not give the customer at least 24 hours’ notice.”



# This standard encourages water companies to keep their promises

## Key positives:

- **Feels equitable.** Customers feel that if they have taken time off work to be present for an appointment, then water companies also have to hold up their end of the bargain and turn up when they say they will. It feels fair that they are compensated if companies don't meet them halfway.
- **Feels responsible.** Customers feel that water companies are large enough to have the capability to mitigate extenuating circumstances, therefore should be held to account if they don't.
- Some were **pleasantly surprised.**
  - Water companies are 'doing the right thing' by having this as a standard; showing they respect their customers and their time, as much as their own.
  - Many feel that engineers are often late or don't show up, so this standard keeps them accountable.
  - This is mainly informed by other experiences, both with utilities and delivery services.

"There isn't really an excuse for not showing up. That's poor management, that's not acceptable."

**NHH customer**

"This can interrupt a full day. That could be a lot of money if you're self-employed."

**HH customer**

# Standard does not consider repeat missed appointments

## Points for consideration:

- **Consistently missing appointments is not taken into account.**  
The standard only covers the initial missed appointment. Increased instances of missed appointments further impact customers; rearranging work/childcare once might be doable, but to have to do it multiple times is very frustrating.
- **Increasing impact.** Some customers felt the more appointments that are missed, the more inconvenient and impactful this is. The amount of compensation should increase incrementally to reflect this.
- **Proportionate to impact.** Many customers feel the compensation amount should be directly linked to the impact a missed appointment has on the individual. If the customer works from home, then the impact is minimal – if the customer has had to take time off work, then this is more impactful, and they should therefore be entitled to additional compensation.

“What if it happens more than once though? I can’t rearrange work so easily if I’ve already done it once that month.”

**HH customer**

“When they repeatedly don’t show for appointments [compensation] should get more each time.”

**NHH customer**

# Customers who have had appointments missed wish to have subsequent appointments prioritised

## Development & improvements:

- **Offer help with rebooking** to lessen the load on the customer.
- **Offer additional flexibility** to give customers more options when rebooking appointments, as they have previously been inconvenienced. It could be potentially more difficult to make arrangements on a second occasion.

- **Minimum time frame for rearranging a missed appointment** so individuals feel their issue is a priority and will be dealt with imminently.
- Additional help when booking could be **helpful for some vulnerable customers**, including those who have other appointments to book around, those who struggle to make appointments themselves, etc.

“For someone like my mum, she’d need help rebooking if her appointment was cancelled. She couldn’t do it online herself, and I wouldn’t want her to suffer because of that.”

**HH customer**

“[Considering vulnerable customers] I don’t think the financial gain should be any different, more money won’t help. They should have additional support, not more money for this.”

**HH customer**

# Current payment is not reflective of the potential inconvenience

## Response to the current payment:

- For some, getting a payment at all is still a pleasant surprise, as they did not expect to see the standard (similar to Making Appointments).
- However, for some, it's just the 'right thing' for companies to do, so the payment should reflect this. Currently it doesn't, and £20 feels very low.
  - **HH:** It **isn't representative of the inconvenience caused** by a missed appointment
    - Doesn't replace a shift of missed work, or cover the 'opportunity cost' for self-employed customers
    - Doesn't match the 'faff' of rearranging other appointments/ childcare, etc.
  - **NHH:** almost doesn't feel 'worth it' to chase for this, given appointments are expected in work time. The time spent on the admin would 'cost' the company more than this compensation; it's almost a pointlessly small amount.

"I'm having to take 4/5 hours off for a morning or afternoon appointment so £20 isn't nearly enough!"

**HH customer**

"I've had to take time off, I've lost a day of work. If they can't [keep an appointment], then that's on the water company to hire more staff."

**HH customer**

## Minimum payments

	Current
HH	£20
NHH	£20

# Proposed payment more acceptable, especially in conjunction with two-hour timeslot availability

## Response to proposed/projected payment:

- **HH:** the proposed payment felt much more reasonable.
  - Some felt this instinctively, as 'more than double' felt generous.
  - Some linked it to the minimum wage someone could expect to earn; this at least covers half a day of lost earnings, so feels right.
  - Others judged it against their water bill. £50 felt like a 'good amount' compared to their monthly bill, so felt like a fairer trade (i.e., a month of free water for two days of inconvenience).

- It feels especially good given the new knowledge that timeslots of two hours can be requested, further limiting the inconvenience for customers.
- **NHH:** proposed payments were not shown to NHH customers. However, some suggested amounts should be £150-£200. This was suggested to:
  - cover potential costs to businesses who might lose revenue due to unresolved issues, and to
  - be 'punitive' enough to ensure water companies do not make a habit of missing appointments.

"£50 is fair enough. If I haven't opted to have a two hour slot then I can't really complain that I've lost money."

**HH customer**

"They'll be on the ball, engineers will know it's going to cost them if they're not there, they have to be organised."

**NHH customer**

### Minimum payments

	Current	Proposed
<b>HH</b>	£20	£50
<b>NHH</b>	£20	

# Further changes to payment were looked for to make it feel fairer

## Desired improvements to payment:

- **Increased amounts for repeated missed appointments.**
- **Increasingly inconvenient.** Many felt that the amount of compensation should increase incrementally to reflect the inconvenience caused to the customer having to repeatedly reschedule.
- **Further incentivise water company.** Many customers would like to further encourage water companies to keep their promise and introduce a time critical element to this to incentivise a swift resolution.

## • Needs to stay ahead of living wage.

- While some felt the amount to be calculated based on individual impact (e.g., household income), this was overall felt to be unfair for those on lower incomes or retirees. Therefore, keeping this standard at least in line with the living wage was a compromise some discussions reached.
- Especially key here due to the physical need for customers to be at home, therefore potentially not at work, as a result of this standard being breached.

“When they repeatedly don’t show for appointments [compensation] should get more each time.”

**NHH customer**

“This is ok if they don’t turn up once, but what about if they don’t turn up two, three times?”

**PSR customer**

## Minimum payments

	Current	Proposed
<b>HH</b>	£20	£50
<b>NHH</b>	£20	



# Making appointments: summary

## Relevancy

- Another somewhat unexpected and pleasantly surprising standard, given low expectations of companies
- Relevant for all customers, as all are inconvenienced by missed appointments
- While less impactful for those who can work from home, all can still be frustrated by this issue, and see the value in the standard

## Updates

- Customers who have had appointments missed want subsequent appointments prioritised
  - A minimum timeframe to arrange a rebooked appointment was ideal for customers
- Help with rebooking is also looked for, especially for vulnerable customers

## Payment

- Current payment amount feels too low; £20 isn't representative of the inconvenience caused by a missed appointment
- Proposed payment felt more reasonable
  - Assessment linked to minimum hourly wage (half day) and water bills
- Should be at least in line with living wage going forwards – most important for this standard due to potential of missing out on work, which disproportionately affects those working shifts/on lower incomes

### 3. Complaints, account queries & requests about payment arrangements: account queries & requests about changes to payment arrangements not actioned on time

The principle was generally well accepted, however there were several details which significantly limited relevance.

- The standard only being relevant where companies were contacted 'in writing' limits usefulness.
- Felt particularly relevant to vulnerable customers, especially those who might have related financial issues. Requests to payment arrangements that are not actioned on time may have a disproportionately detrimental impact on these customers, so making sure they are protected feels important.

#### Standard as presented to participants:

**"Account queries and requests about changes to payment arrangements not actioned on time.**

- If a customer queries in writing the correctness of a bill, the company must send a substantive reply to the customer within ten working days from the receipt of the query.
- If a customer requests, in writing, a change to a payment arrangement and the company is unable to agree with the request, the company must send a substantive response within five working days from the receipt of the request.
- If the company fails to do any of the above, the company must automatically make a GSS payment to the customer."

# This standard reassures customers, helping them feel more 'in control' by giving them information

## Key positives:

- **Billing and payment terms are a key area** for customers, so having a standard which supports good practice around this feels sensible.
- **Customers know they will not be left 'in the dark' waiting for a response**, so they can put their minds at ease.
- **Five-day response time is generally felt to be appropriate**, if not dealing with an emergency.
- Some felt that the five-day timeframe was **reassuring**. It gives the impression that the company would use the time to investigate the issue thoroughly. This gives customers confidence.

Anything shorter than this might be too short for comfort, and customers feel it might even result in careless or unhelpful responses from the company.

- **Reassures customers that they can expect a considered response** within a given timescale. It offers clear guidance around when customers can expect companies to get back to them, and ensures their queries are not just 'set aside'. This reassures customers, making them feel listened to and respected.

"100% in agreement with that. If I write to a company, I'm waiting for the reply. If they don't respond, it's not courteous."

**PSR customer**

"The word substantive to me means they've looked into it and have come to a conclusion. So that's good."

**PSR customer**

Five days is effectively one week. Obviously sooner is better, but if this is the maximum, that's not bad."

**HH customer**

# Outdated method of communication limits relevancy, & language can be confusing

## Points for consideration:

- **Potentially limited relevance due to the specified condition of queries and requests needing to be 'in writing'.**
  - Customers assume that 'in writing' includes email, at the very least – but are not actually sure. Methods of appropriate communication need to be clearer.
  - If it means only a letter via post, this is very outdated, and not felt to be fit for purpose.
- **Additionally, some had questions around what the standard means practically:**
  - What does a '**substantive response**' mean? This feels unclear due to it being subjective – what one person sees as substantive, another may not.
  - What about more **general queries**? Can customers only ask about account queries and payment requests?
  - Customers also didn't understand why there are multiple timeframes included in the standard. **10 days – effectively two weeks – is too long to wait for a reply, especially where billing queries are concerned.**

"I wouldn't write a letter...a lot of places don't even have a post room anymore!"

**NHH customer**

"I don't really understand why there are two different timescales, 10 days and five. And what about other issues that aren't mentioned?"

**PSR customer**

"What is a substantive response?...I would take out the 'substantive' part and make that an actionable response."

**NHH customer**

# Updating contact methods is key to make this standard relevant

## Development & improvements:

- **The condition 'in writing'** needs to be **updated and clarified**. If the standard is only valid if a customer has sent a letter, it is very restrictive.
- While there is an acceptance that different companies will have different addresses (and therefore this level of information cannot be included in the standard), **there does need to be clarification in the standard that a company must accept communications via more than one channel.**

**Contact methods need to be customer-led.** Given that writing a letter and sending it by post is now considered old-fashioned, the standard should be updated to include modern forms of communication:

- Recorded phone calls to allow responses to verbal requests
- Email with correspondence trail to act as a transcript to avoid disputes
- Other direct contact e.g., chatbots, live chat function, text/WhatsApp
- Some would use an online portal to record issues, similar to the kind they use for their internet/mobile network providers
- This could be especially true for customers who might have different communication needs, and who may be unable to write and/or post a letter.

"Where it says customer requests in writing, I think it should include other methods like phone, live chat, email."

**HH customer**

"If I had a learning difficulty and I had to do that [query in writing] I probably wouldn't be able to do it, I'd rather call up...you should be able to query on the phone as well."

**HH customer**

"They need to be clearer on 'writing' and what that means – if I phone up am I not entitled [to the payment]? Just so I know exactly what I need to do."

**NHH customer**

# Desire for more clarity around standard specifics including what constitutes a substantive reply

## Development & improvements:

- **More clarity** is looked for, with regards to the term 'substantive'.
- **Improved timescales are desired.** Both replies to a query or requests should be replied to within five working days.
  - 10 days feels like an unreasonable amount of time to wait for a response regarding billing.
  - With more modern forms of communication, both sending and receiving messages can be almost immediate. Some felt that there could be a place for holding emails, to **acknowledge receipt of query**.
  - This could be helpful for customers who might be in **emotional distress due to billing / payment arrangements**.

## Detailed discussion: timescales for response

**Most wanted the improvement to be replying to both queries and requests in five days. However, some had even higher expectations for timeframes if contact is electronic:**

- A minority wanted to have a response much quicker than this, within 24 hours, given emails are quick to deliver (both from the customer and the water company).
  - However, most felt that asking for responses in this timeframe was an unreasonable expectation.

**Some had high expectations around the response itself:**

- Some didn't want a 'substantive reply' within the timeframe; they wanted a promise of a solution within five days.
  - Again, this was felt to be unreasonable by many.

**More moderate solutions were then discussed:**

- Immediate replies acknowledging receipt of query/request, which also gives customer timeframe for substantive reply.
- Initial substantive reply in five days for queries and requests.
- Quicker responses if follow-up is needed regarding the initial issue, e.g., two working days, so customers are not waiting an additional five working days after each interaction.

# Compensation levels can feel high if there isn't a negative consequence for the customer

## HH: Response to the current payment:

- Some expressed **surprise that a delayed response to a query/request was 'worth' the same as a missed appointment.** Customers generally felt it would be less impactful for most, and therefore were surprised the levels of compensation were the same.
- However, this is **only true if a delay does not cause any financial hardship** to customers. Some felt that if a financial issue is caused by the breach of this standard, then customers should be compensated the 'minimum' amount, plus any costs incurred because of it (e.g., £20 plus any overdraft fees incurred because of the issue).

This is directly linked to the idea that larger impacts require larger payments to feel 'fair'.

- This is even more important if the water company is found to be at fault.

## HH: Response to proposed payment:

- Positive response to good increase (more than double). Felt to be enough to make water companies accountable in responding.
- Some feeling that the new payment is 'too much', however given it is in line with other payment increases, it is fair that this increases also.

"That's too much. It's only a delayed reply to a letter, but they're going to compensate the same as someone who has taken the morning off work for an appointment."

HH customer

"If I go into my overdraft, £20 isn't going to cover it."

HH customer

### Minimum payments

	Current	Proposed
HH	£20	£50
NHH	£20	



# Compensation perceived differently by NHH customers

## NHH: Response to the current payment:

- Felt to be far too low, due to the potential time spent chasing a resolution for these issues.

## NHH: Desired improvements to payment:

- **Increased amounts for each day query/request not responded to.**
  - **Increasingly inconvenient.** Businesses were aware of the time-cost of chasing companies for information. Therefore, the longer they do not receive a reply for, the more they should receive, e.g., increase by 50% for each day beyond the initial five-day timescale that they do not receive an answer by.
  - Again, **serves to further incentivise a water company** to act quickly to answer any queries.

“Chasing can have a huge knock on effect for my workload, and my billable hours.”

**NHH customer**

“£20 compensation is not very much at all for a business. It's not really worth having. Don't bother throwing away £20 here and there.”

**NHH customer**

## Minimum payments

	Current	Proposed
HH	£20	£50
NHH	£20	

# Account queries & requests about payment changes not actioned on time: summary

## Relevancy

- Overall, the principle of the standard was well liked, as it encourages companies to be accountable and contactable regarding the key area of billing
- Confusion around what is a valid method of contact limits usefulness. Especially if it does mean only 'via a written letter', this makes the standard almost redundant for some

## Updates

- Clarify wording around communication methods
  - If it does mean only via written/posted letter, update this to include email at the least
- Clarify meaning of a 'substantive' response
- Improve timescales – five working days maximum for both queries and requests

## Payment

- **HH:** Current payment amount felt to be acceptable if there is minimal negative impact to customers
  - If this standard being breached results in negative financial impact, this should be covered in addition to compensation
- **NHH:** Current payment not acceptable due to lost business time spent chasing answers
  - Should increase with every additional day queries/requests are not responded to

## 4. Complaints, account queries and requests about payment arrangements: written complaints not actioned on time

This standard was largely conflated with the previous standard (3).

The principle was generally well accepted, but again there were several details which limited relevance for some.

- This was deemed relevant for both HH and NHH customers, as complaints can be highly emotive and therefore it's important that customers do not feel ignored.
- Lengthy timescales and again the issue of the condition 'in writing' makes relevance limited for many.
- Some did not understand how 'the supply of water or the provision of sewerage services' affected them in terms of complaints. What about other types of complaint?

Standard as presented to participants:

**"Written complaints not actioned on time.**

- If a customer complains in writing about the supply of water or the provision of sewerage services, the company must send a substantive response to the customer within ten working days of receipt of the complaint.
- If the company fails to do this, the company must automatically make a GSS payment to the customer."

# This standard also reassures customers, which is key when dealing with complaints

## Key positives:

- **Good supply is absolutely vital**, so customers are pleased a standard exists around raising complaints relating to this as it supports good practice.

## Customers are reassured in a similar way to standard 3 (account queries and requests).

- **Customers know they will not be left 'in the dark' waiting for a response**, so they can put their minds at ease.
- **Reassures customers that they can expect a considered response** within a given timescale. It offers clear guidance around when customers can expect companies to get back to them, and ensures their complaints are not just 'set aside'. This reassures customers, making them feel listened to and respected.

"The standard is straightforward – it tells you what to expect. It is good to know that you will hear back in a specific timeframe."

**NHH customer**

"This is the same as the other one, isn't it? Yes, they need to have a standard for this, you don't want to be in limbo, hanging on."

**HH customer**

# Language around communication channels is still confusing

## Points for consideration:

Customers have similar issues to those raised in relation to standard 3 (account queries and requests).

- **Potentially very limited relevance due to the specified condition of complaints needing to be 'in writing'.**
  - Customers assume that 'in writing' includes email, at the very least – but are not actually sure. Methods of appropriate communication need to be clearer.
  - If it means only a letter via post, this is very outdated, and not felt to be fit for purpose.

- Some had questions around what the standard means practically, as language again feels unclear:
  - What does a '**substantive response**' mean when replying to a complaint about a supply issue?
    - Some took this to mean a solution/resolution in all cases.
- What about more **general complaints**? Why is it limited to only supply of water and provision of sewerage services, are other complaints not important?

"I am concerned that slippery firms will find a way to wiggle out of paying, as 'substantive' isn't a quantifiable term."

**HH customer**

"I think there just needs to be one umbrella for all complaints, not just the ones mentioned here."

**NHH customer**

# Timescales are felt to be unreasonable, as supply issues can have a big impact

## Points for consideration:

- **10 days is too long to respond to a complaint around supply of water or provision of sewerage services.** This is the key service companies provide; waiting two weeks to hear back about a potential issue is unreasonable to customers.
- There are also concerns that **some issues may be more time sensitive** than others – does the timeframe apply to all supply issues, from investigating lower urgency (e.g., pressure issues) to higher urgency (e.g., flooding, not having water)?

“10 working days is just giving the retail water industry an excuse not to have that service level delivery working at optimum.”

**NHH customer**

“If you’re complaining about your supply, that’s going to be a bigger issue than complaining about a bill, surely! So why is the timeframe longer!”

**HH customer**

# Clarity around contact methods & nature of response is wanted

## Development & improvements:

Issues regarding 'in writing' language and clarity is the same as standard 3 (account queries and requests).

- **The condition 'in writing'** needs to be **updated and clarified**. If the standard is only valid if a customer has sent a letter, it is very restrictive.
- **Contact methods need to be customer-led**, including options of phone calls to allow verbal complaints, emails and chatbots/live chats, etc.

- Again, especially true for customers with different communication needs.'
- More **clarity** is looked for, again with regards to the term 'substantive'.

**These communication channel issues are even more significant given the nature of this standard.** Complaining about an issue with supply is felt to be more of an immediate need than a more 'low stakes' account query. Customers feel they would want to complain about, and find a solution for, a supply issue as quickly as possible; this does not mean via post.



"If I have to write a letter to complain, I'm going to write a letter complaining about that!"

**HH customer**

"I'm hardly going to write a letter to complain about a supply issue. I'm phoning someone, I can't wait around for the post."

**HH customer**

"Again, it's just not clear what you need to do."

**PSR customer**



# Desire for updated timescales to reflect that not all complaints are resolved after one communication

## Development & improvements:

- **Improved timescales are looked for.**  
Complaints should be replied to within five working days.
  - 10 days is an unreasonable amount of time to wait for a reply regarding a supply complaint.
- With more modern forms of communication, communication can be almost immediate. Some felt that there could be a place for holding emails, to **acknowledge receipt of their complaint.**
- **Add a timescale for a solution/ resolution.**  
This could be as long as 12 weeks, but is felt to be needed to stop issues 'dragging on'.

- **Tiered approach to severity of the complaint** to ensure issues that are time-sensitive/emergencies are dealt with as a priority.
- There is also the desire for the standard to **cover more complaint types beyond just those about water supply** and sewerage provision, e.g., engineer issues.

## Detailed discussion: timescales for solutions

**All wanted their complaints to be at least replied to within five working days – this was universal.**

- Some had higher expectations around timeframes, and wanted a solution to their complaint within five working days (where needed), not just a 'response' that might require more communications.
- Some felt this was unreasonable, as solutions to complaints are not always straightforward.

A compromise suggested around this was to include an addendum about finding a solution within a different, longer timeframe (e.g., 12 weeks). If a solution is not found by then, customers should be eligible for another payment.

This would provide an extra incentive for water companies to not only reply to complaints, but also to address them.

# Compensation levels should be proportional to severity of complaint

## Response to current payment:

- More reasonable to receive a payment for an 'ignored complaint' than a delayed response to a query/request – but £20 is not enough.
- £20 initially feels like a complaint has been acknowledged, however this is **highly dependent upon the severity of the complaint**.
- Customers found it hard to assign a minimum figure. Complaints can be **highly emotive in nature**, and customers wanted to link the amount to the impact of the complaint.

## Response to proposed payment:

- Positive response to good increase (more than double). Felt to be enough to make water companies accountable in responding.
- However, this **only applies to non-urgent issues**. The nature and impact of the complaint needs to be considered; customers feel if it affects them more, they should get more.
- This should consider both the **practical and emotional impact**.
- There is also a desire to include an additional, longer timescale for another payment if no solution/ resolution is found to a complaint (even if the initial complaint is *responded* to in time).

"£20 feels OK, as long as it's not dealing with something serious."

**HH customer**

"I think if you've already had something bad that's happened to you and they've let you down again, it should be at least £50."

**HH customer**

## Minimum payments

	Current	Proposed
<b>HH</b>	£20	£50
<b>NHH</b>	£20	

# Written complaints not actioned on time: summary

## Relevancy

- Overall, the principle of the standard was well liked, as it encourages companies to be accountable and contactable regarding the key area of supply issues
- Complaints can be highly emotive and therefore, it's important that customers do not feel ignored
- Confusion around what is a valid method of contact limits usefulness. Especially if it does mean only 'via a written letter', this makes the standard almost redundant for some

## Updates

- Clarify wording around communication methods
  - If it does mean only via written/posted letter, update to include email at the least
- Clarify meaning of 'substantive'
- Improve timescales – reduce to five working days maximum
  - Consider tiered approach, reflecting the severity of complaint
  - Consider a separate, longer timescale for solution/ resolution to a complaint
- Widen standard/create new standard to cover complaints beyond just water supply

## Payment

- £20 reasonable for lower-stakes complaints; proposed payment of £50 is more acceptable as it covers more situations
- Higher severity complaints need more than this, as the impact of non-response could be bigger
  - This includes emotional impact

## 5. Notice of interruption to supply: incorrect notice of interruption to supply

**Initially felt relevant, however some condition details limited how positive customers were.**

- Very relevant, as the supply of water feels is a basic service expectation all have, so any interruptions to the supply need to be communicated.
- Customers understood and welcomed the idea of their water company planning to carry out work, presumably to protect and update infrastructure.
- 48 hours notice feels fair for household customers, and the minimum time frame any interruptions need to be communicated to the customer by to make plans and arrangements.

### **Standard as presented to participants:**

“Where it is planned that the water supply will be materially interrupted or cut off for more than four hours to carry out necessary works, the company must give written notice to affected customers at least 48 hours before the supply will be interrupted or cut off, including notification of the time by which the supply will be restored.

If the company fails to do this, the company must automatically make a GSS payment to the customer.”

# Adequate notice is essential to limit the inconvenience of interrupted water supply

## Key positives:

- **Having notice allows customers to plan effectively and make arrangements, to limit disruption caused.** Any interruptions to supply will inconvenience customers in some capacity, but 48 hours notice allows enough time for most HH customers to be able to work around it.
  - This was less true for NHH customers (see next page).
  - Can also be less true for vulnerable customers if the supply is interrupted for a long period of time (see next page).
- Customers mostly **understand and expect interruptions to their water supply** in order for water companies to perform maintenance, but proactive communication around interruption is also required.
- Giving notice is **the least the water company can do** when they cannot deliver on their key service.
- Customers like to be 'in the know' of when and why their supply will be interrupted. **Communication efforts demonstrate good customer service.**
- Some feel **reassured that there are works being carried out.** While the notice is the most valued aspect of the standard, some welcome the idea that maintenance works are being carried out at all.

"These things happen but it's great to have notice so we can plan for it. If this is not done, then yeah, I think compensation is definitely justifiable."

**NHH customer**

"Four hours with no water, it's not the end of the world if you have notice."

**HH customer**

# Some felt the timeframes were not reasonable for 'planned' works

## Points for consideration:

- **'Planned works' changed some feelings towards the fairness of the 48-hour notice period.** When it was recognised that water companies would be aware of upcoming planned works well in advance, some then felt that having only **48 hours of notice is an unnecessarily short amount of time to plan.**
- **48 hours of notice is not felt to be enough for business customers.**
  - This might cover a weekend, resulting in effectively zero working days to make plans.
  - Businesses in particular feel there is no reason water companies should only tell them 48 hours in advance.
- This was true for both water critical and non-water critical businesses.
- **Standard does not stipulate different timeframes for different lengths of interruption.** Supply might be interrupted for significantly longer than four hours, in which case the 48-hours-notice is not appropriate.
  - This was felt to be more applicable for vulnerable customers, especially those with medical needs necessitating a supply of water for a majority of the day.
  - NHH customers also felt this was a significant failing of the standard.

"I'm happy with the 48 hours, but if it's planned I would expect to get notice as soon as they know, weeks in advance."

**PSR customer**

"I think if its going to be off longer than four hours you need to give me even more notice."

**NHH customer**

"The hairdresser next to us on the high street are always fully booked, they'd surely need more than two days notice if they needed to cancel dozens of appointments. Think of their reputation."

**NHH customer**

# Providing additional water is a key expectation customers have when there is a planned outage

## Points for consideration:

- There is an **expectation that the water company will make provisions of bottled water** where there is an outage. This not being in the standard feels 'wrong' to customers, who see this as a key service expectation.
- This was especially expected for vulnerable customers who may be more impacted than others by an interrupted supply.
- This is also important where outages last 'a whole day' or impacts the 'peak' hours where water is needed, i.e., pre- and post-work/school.
- Some confusion around what constitutes a 'written' notice, and some worry that notice by post may not successfully reach affected customers.
- Concern around this heightened by the postal strikes over November/ December 2022.

"I'm surprised not to see them promise to give you water in a situation like this. I'm sure I've had that before – why isn't it something everyone is entitled to?"

**PSR customer**

"I really hope they wouldn't just send a letter to the office. With hybrid working, someone might not see it for a few days. I'd prefer to get an email, or text, or both, in addition to a letter than I can file."

**NHH customer**



# The standard could better reflect the greater impact of longer interruptions

## Development & improvements:

- **More notice is needed for longer periods of interruption.** 48 hours is appropriate for around four to eight hours of planned interruption – longer than this (i.e., 'one day' without water) needs more planning time.
  - This is even more important for business customers and those on the PSR or other vulnerable customers.
- Water companies need to make the **best effort to contact customers:**
  - **Multiple contact attempts**, including more than one attempt to notify prior to the 48-hours-notice.
  - **Multiple contact channels.** Customers would like to **select their preferred method of contact**, including text messages, an email, telephone, etc.
- For some, there needs to be **an acknowledgement of the peak times that are most inconvenient to carry out works.** As the standard states the work is planned, customers feel there should be an effort to avoid 'water-essential' hours, where the interruption will cause a higher impact.

# Response to current payment is very negative given the impact & potential expense incurred

## Response to the current payment:

- Current payment levels feel unacceptable to customers; it does not reflect the impact of not being able to plan to be without water.
- **HH:** customers: feel that not getting notice of supply interruption could have significant consequences. Some felt they would need to travel to stay with family or stay in hotels, resulting in expenses they feel they would not be able to cover given the promised notice.

- **NHH:** the payment feels 'pointless'.
- For NHH customers, the payment is not enough to make up for an unexpected lost day of trading; however, businesses do not necessarily feel like it should. Instead, there is a feeling that **the amount should be high enough to ensure that water companies adhere to this standard.** Currently, it is felt to be too low to do this effectively.

**For HH and PSR customers:** Compensation feels linked to the potential financial impact on the customer in a way previous standards do not. It's seen as a payment to make their life bearable in the face of unexpectedly having no water, as well as a 'sorry' payment. The currently amount doesn't cover either of these.



"The amounts are far too low for a business – that wouldn't make a dent in the problems caused."

**NHH customer**

"This is a joke! We might as well end the call now, it's insulting!"

**HH customer**

## Minimum payments

	Current
<b>HH</b>	£20
<b>NHH</b>	£50

# The new amount feels more reasonable for the potential inconvenience

## Response to proposed payment:

- Some surprise due to the amount of the increase (over triple). New amount felt to better reflect the impact of this standard being breached.
- Feels like a reasonable amount to compensate for any personal provisions made, such as water bottles purchased, some emergency travel, etc.

## Desired improvements to payment:

- Sliding scale linked to duration of planned outage. £75 is reasonable for four to eight hours (i.e., approx. 'one day'), but longer outages are more impactful, and therefore should have higher levels of compensation if customers cannot account for them.
- Some discussion around number of residents in a household impacting amount received – a family of five will need to spend more than a couple or someone living alone, however discussion not conclusive.
- Some calls for different payments for 'peak' and 'off-peak' interruption (e.g., more due if supply off during business hours).

"That's so much better. That covers your taxis to the supermarket, your water while you're there...but it's still not enough if you're without for days on end, and you don't know when you're going to get it back."

**HH customer**

"That covers anything you would need to buy to replace your water."

**PSR customer**

## Minimum payments

	Current	Proposed
HH	£20	£75
NHH	£50	

# Notice of interruption to supply: summary

## Relevancy

- Highly relevant due to impact of not being able to plan to have no water
- Customers understand the need to carry out necessary works
- 48 hours of notice for a short interruption (approx. four to eight hours) appropriate for most HH customers
- Timescale makes standard less relevant for NHH customers, as 48 hours not enough
- Can also impact relevancy for vulnerable customers with medical/care needs

## Updates

- Let customers know further in advance, given the nature of 'planned' works
- Increase period of notice for
- Periods of interruption longer than four to eight hours
- NHH customers
- Vulnerable customers with medical/care needs
- Interruptions over 'peak' water usage times
- Ensure multiple channels used to inform customers

## Payment

- This payment feels directly linked to potential expenditure incurred due to standard failure
- Current amount unacceptable for this
- Proposed payment more acceptable to cover costs
- Payment increase does not remove need for water companies to make an alternative provision for water
- Especially key for vulnerable customers
- Increased payments wanted if planned outages are longer than eight hours

## 6 & 7. Supply not restored: initial period (6) & each further 24 hours (7)

The impact of companies breaching these standards feels very relevant to all, however technical language and different timescales caused confusion over how it would work in practice.

- All customers would feel a significant impact from being without a water supply, so to have a standard in place to ensure it is restored promptly is extremely relevant.
- For 'water critical' businesses this standard is essential to minimise the financial impact supply interruptions would cause.
- For some, the confusing nature of multiple time frames and causes of interruptions limited their understanding of how the standard would apply to them in a real-life situation.

### Standard as presented to participants:

#### "A GSS payment must be made automatically if:

- the supply is interrupted or cut off to carry out necessary works, and the supply is not restored by the time stated in the written notice given to affected customers;
- the supply is interrupted or cut off in an emergency due to a leak or burst in a strategic main and is not restored within 48 hours of the company first becoming aware of the interruption or that the supply was cut off, or;
- the supply is interrupted or cut off in an emergency for any other reason and is not restored within 12 hours of the company first becoming aware of the interruption or that the supply was cut off.

A further automatic GSS payment must be made for each full 24-hour period that the supply is interrupted or cut off."

# These standards in particular are an incentive for water companies to restore supply & reduce impact

## Key positives:

### Standard 6

- **Good incentive to get the water back on.** The standard is a guarantee that should the water supply be cut off, the company will then work to ensure it is restored promptly.
- **For NHH customers, this is a key standard to have in place due to the business impact and financial loss at stake.** For water critical businesses especially, this is a 'worst case scenario', so it feels reassuring that this is recognised by having a standard to minimise time without water, and therefore the financial impact.

- **Detail covers a lot of situations** and customers hope that any situation impacting supply would be covered under at least one of the conditions.
- Assumed that companies will also provide bottled water while the supply is still interrupted.

### Standard 7

- Good that for further inconvenience, an additional standard is in place to stop companies waiting days to complete work.

"If you get any interruption, it is the duty of the water company to compensate the customer."

**HH customer**

"It's good to have these regulations, without it, water companies will take the mickey...there would be no rush to fix it, and this protects us against that."

**HH customer**

"It serves as a template...as a level of guarantee this is spot on."

**NHH customer**

# Language is not easy to understand, resulting in some customers assuming the worst

## Points for consideration:

### Standard 6

- **Difficult to understand in full.** Customers understood the overall premise of the standard, but the detail of the multiple conditions and time frames left some questioning:
  - What events do the different time frames refer to specifically? How can a customer tell which part of the standard would be applicable?
  - What does an 'emergency for any other reason' mean?
  - What is a 'strategic main'?
- **Some focused on the longest initial period time frame of 48 hours which feels too long to be without water and not qualify for compensation.** Most customers immediately jumped to the worst-case scenario of being without water for up to 48 hours and potentially not receiving compensation, which feels far too long.
- This is exacerbated by a lack of understanding around what might cause these interruptions, and what kind of events would qualify for which time frame.

"I think the timings are too long. The reasons are too vague. I think it should be four hours."

**HH customer**

"Seems like a complicated standard."

**NHH customer**

"A lot of words, what is the definition of emergency?"

**NHH customer**



# Having to wait a full 24 hours to receive any additional compensation feels unfair

## Points for consideration:

### Standard 7

- Fundamentally customers experience 23:59 hours the same as 24:01, however, one would be due compensation and one would not. This does not feel fair to customers.
- For most households, each hour without water has the potential to cause great stress and inconvenience.
- For 'water critical' businesses, each hour without water can cause great financial and business impact.
- This is on top of already being without water for up to 48 hours, which lessens customer goodwill.
- There is also some concern that having to wait a whole 24-hour period to receive additional compensation is not motivating to companies.

"Wait, so if they restore it a minute before the 24 hours is up, you don't get any extra? Even though you've had a whole extra day without water? That's so sneaky."

**HH customer**

"How do they know when to start measuring it is what I'd like to know. It feels like a good way to avoid paying out any extra, and just deprioritising jobs that can 'hold on' an extra few hours...yeah that time makes a lot of difference to me, I need to give my customers notice if they can't come in. It's a reputation thing."

**NHH customer**

# Water provisions are expected when companies cannot provide the promised service

## Development & improvements:

### Standard 6

- **The standard needs to include provisions that will be available**

to customers in face of interrupted or no water supply. This may be bottled water or access to a water tank and should be explicitly stated in the standard.

- Customers expect their water company to provide them with water at all times, so where this supply interrupted, customers still expect companies to uphold this in some form.

- Provisions feel especially critical for those who have less ability to access water, including those who:

- Live rurally
- Are not well connected with local friends/family who could go and get water for them
- Have limited access to transport

- **Clearer language should be used when detailing the conditions.** The distinction between the varying causes for the disruption and relevant timescales needs more clarity, to help customers decipher which time frame they should expect for their water to be restored in.

"I'm sure water companies do give you water when they have to interrupt your supply. Mine does, but the ones that don't should be made to."

**PSR customer**

"Seems like a complicated standard."

**NHH customer**

"A lot of words, what is the definition of emergency? What is the minimum of emergency case, but it is good they are not too succinct."

**NHH customer**

# Providing support to vulnerable customers is essential, but not a 'one size fits all' solution

## Development & improvements:

### Standard 6

- **This is a key standard where vulnerable customers need to be recognised and offered additional support**, due to the significant impact of not having access to water for a substantial length of time (over one day).
- Water companies should **tailor their support/water provision** to those most in need, including:
  - Those with reduced mobility, who need a service to connect them with a provision of water.
  - Households on low income, who may not have the immediate funds available to buy water.
  - Those with a medical condition where the supply of water is essential to manage this condition (e.g., dialysis).

### Detailed discussion: Recognition of vulnerable customers

Most felt that more vulnerable customers should be accounted for within this standard, as they are likely to feel the biggest impact. However, there were mixed views on how this support should be offered:

- Some felt that higher and speedier payments should be made to vulnerable customers than standard customers, to help fund their own provisions of water.
- However, some felt that additional compensation would not be the most beneficial method of support. Instead, water companies should provide additional services, such as prioritising the provision of bottled water, providing access to a temporary supply of water, etc.

While not everyone agreed that vulnerable customers should receive additional cash compensation, all did agree that vulnerable customers needed to be seen to as a matter of priority.

# A whole 24 hours feels too long to wait in order to be eligible for an additional payment

## Development & improvements:

### Standard 7

- Having to wait a full 24 hours to receive an additional payment is not felt to be appropriate to the potential impact. **Payment timescales need to be adjusted to reflect the impact more fairly.**
- **This should be as follows:**
  - Pro-rata the 24 hours and pay a percentage for each hour beyond the initial interruption (preferred by many)
  - Reduce time frames to eight or 12 hours to be eligible for compensation
  - Higher payments for interruption during 'peak' times

### Detailed discussion: pro-rata the 24 hours

- Many felt that an additional 24 hours for another payment was too long. Some suggested more reasonable timelines were 8-12 hours.
- However, some felt that having any set time frame could be an easy 'get out of jail free' card for water companies. There were fears of the water being restored minutes before the eligible compensation time, leaving customers without water for a lengthy time and with no compensation.

To resolve this, many groups discussed the idea of a 'sliding scale', where the 24 hours of additional interruption was worked out pro rata, meaning customers would be eligible for a percentage of compensation dependent on the time period by which the supply was not restored.

# Current payments are not proportionate to the amount of potential disruption

## Response to the current payments:

- Far too low for the impact felt – especially jarring given it’s the same amount as they would get for an incorrectly made appointment.
- For NHH customers specifically, this amount feels almost insultingly low, due to the potential impact on both their **earnings and their reputation**.
- Negative response towards the additional 24-hour payment being lower than the initial period, as the impact only increases the longer the supply is out for.
- Customers fear they will ‘just miss’ the eligible time frame for payments, so feel it is unlikely they will receive payments (especially for standard 7).

“£25 for having no water for an extra 24 hours, it's almost a kick in the teeth.”

**NHH customer**

“I can’t believe you get less when your water’s been off for longer!”

**PSR customer**

## Minimum payments

	Current
HH	Initial: £20, 24 hours: £10
NHH	Initial: £50, 24 hours: £25

# Higher proposed payments are appreciated, but do not address key areas of concern

## Response to proposed payment:

- More positive response to both payments, especially as additional 24-hour payment is in line with initial period.
- Some feel additional payment should still be an increased payment for further disruption (e.g., suggested £75 initially, £100 for every further 24 hours, £150 for the next 24 hours, etc.).
- Some limited comparison to other utility disturbance payments, such as Ofgem. Some discussed that they offer £150 for 12 hours of disturbance in electricity supply, so comparable payments are desired.
- **Note:** these amounts are customer perceptions of Ofgem payments. Amounts vary but average £70 for interruptions; non-domestic customers £150 in some instances.

## Desired improvements to payment:

- **Additional support for vulnerable customers is still expected**, as the standard payment does not solve potential problems of not having immediate finance available to pay for additional expenses incurred, e.g., bottled water, travel needs.
- **Pro-rata payments or shorter timescales** to be eligible for another payment is also expected.

“Well, that’s better, the second day isn’t worth less than the first day at least.”

**HH customer**

“If it’s not on within 48 hours there would be water provided, rather than it just being monetary...it’s all well making a payment, but I know that not everyone can afford bottled water in the moment.”

**PSR customer**

## Minimum payments

	Current	Proposed
<b>HH</b>	Initial: £20, 24 hours: £10	Initial: £75, 24 hours: £75
<b>NHH</b>	Initial: £50, 24 hours: £25	

# Supply not restored: summary

## Relevancy

- Very relevant for all groups of customers due to high impact
- Standard is essential for NHH customers, especially 'water critical' businesses
- Multiple conditions and time frames cause confusion around how the standard would work in practice
- Timeframes are highest end of acceptable for standard 6
- Waiting an entire additional 24 hours for standard 7 to apply is not related fairly to the impact this issue causes

## Updates

### Standard 6

- Include providing water to customers when their supply is not restored
- Vulnerable customers should receive additional tailored support within the interruption time
- Clearer and more user-friendly language should be used to manage expectations

### Standard 7

- Review approach to additional 24 hours payment, considering a 'pro rata' approach or reduced time frame to qualify for payment

## Payment

- Current payment amounts are felt to be unacceptable for the impact caused by these issues
- This is especially for NHH customers, who might experience loss of earnings and reputation
- Proposed payment received more positively by HH customers, with the large increase reassuring them that water companies do see it as a 'real' issue
- Still doesn't feel right that the payment for further interrupted supply is the same as the initial interruption amount, as inconvenience increases with longer outages



## 8. Low pressure

**Most customers could not understand what practical impact low pressure might have beyond annoyance, which limited how much customers could relate to it. Payment terms also limited how relevant this felt for customers.**

- Some feel that this standard is the least important to include. 'Low pressure' is considered a minor issue; many feel they would not pursue it with their water company if they experienced low pressure occasionally.
- However, customers do acknowledge that it could be more relevant in certain circumstances, e.g., if it impacts the boiler breaking, if water to a certain pressure is required for medical reasons, for some businesses.
- Only being able to claim for this once a year also limited the value customers saw in this standard

### **Standard as presented to participants:**

#### **"Low pressure.**

- A company must maintain a minimum pressure in the communication pipe 7 of seven metres static head (0.7 bar).
- If pressure falls below this on two occasions, each occasion lasting more than one hour, within a 28-day period, the company must automatically make a GSS payment to the customer."



"Bit of a non-issue for me.  
As long as there's water coming from the  
taps, and you can have a shower, it doesn't  
matter if it's a bit slow."

**HH customer**

**Initially, low pressure isn't seen as a key concern, & some customers even 'expect' it**

**Key positives:**

- **Some are initially surprised with the inclusion of this standard,** as many accept that water pressure is an 'everyday' problem.
- This results in some questioning low pressure as something that necessitates a standard.
- **Some expectation of 'lower pressure' occasionally,** so a standard which compensates them for this is welcomed as an idea.
  - Lower pressure can be expected due to:
    - Low-level issues with infrastructure, including small/temporary leaks
    - Weather related issues, including drought or extreme cold
    - Planned maintenance/asset upgrading

# Low concerns are driven by limited experiences of pressure as low as 0.7 bar

## Customer context and experience of 'low pressure' informs attitudes towards the standard.

- Participants found this standard the hardest to apply to themselves. Interpretations of 'low pressure' are subjective and somewhat unsubstantiated, due to most having no context of how low 0.7 bar is, or having no previous issues with pressure.
- **A lack of knowledge** around measurements means most have no context of how low 0.7 bar of pressure is, or the impact it might have on their lives.
- This means they have to rely on their imagination, or what limited experiences they have had, when assessing this standard.

- There were **low levels of experience**:
  - Many had never experienced low pressure.
  - Participants who reported to have experienced low pressure were not sure 'how low' their pressure had been.
  - Due to reporting low pressure as 'annoying but not very disruptive', it is likely that their water pressure remained above 0.7 bar

## Experience of 'low pressure' in the context of the standard is low.

Therefore, customer 'expectations' of lower pressure, and questions around the validity of including low pressure as a standard, should be treated with caution.



"I've had low pressure for years. It's not a big deal, you just don't use the shower and flush the loo at the same time."

**PSR customer**

"I can't run my washer and shower at the same time, so that's annoying. Would that be seven static head or whatever?"

**HH customer**

# Confusion on how to actually measure water pressure can make this standard feel redundant

## Conditions.

### Points for consideration:

- **High pressure** isn't covered, which can also be damaging.
- **Significant confusion around how to measure water pressure.** Most did not know how to measure their water pressure; certainly not in the context of '7 of seven metres static head' from their communication pipe.
- Customers are unsure **who the responsibility of measurement and reporting sits with** – is it their responsibility, or the responsibility of the water company to measure and report on pressure?

- Some concerns around **if the water companies would be honest**, and inform customers if their water pressure had dropped.
- Some **felt that they wouldn't be believed** when reporting low water pressure.
- There were also concerns about what would happen if the water pressure had returned to normal levels if/when the engineer arrived to measure, again exacerbated by being unsure about who has the responsibility to measure.

"We would never know if we were entitled or whether this gets paid because none of us can measure 0.7 bar static head."

**HH customer**

"I live in a flat...is it bad to say I don't even know what a communication pipe is?"

**HH customer**

"We need some honest stats on how many payments they've actually paid out [for this standard]."

**NHH customer**

# The standard doesn't protect customers with persistent low pressure

## Exceptions. Points for consideration:

- Only being eligible for one payment a year is a significant source of dissatisfaction with this standard.
- It feels **tokenistic** – low pressure is not being taken seriously, as they're only prepared to pay once a year.
- Due to this, some were concerned that if they claimed this compensation, the water company then has **no incentive to investigate the issue in a timely fashion, as they won't be 'held accountable'** by the standard for another year.
- This is particularly frustrating to customers as **increased instances of low pressure is more impactful and frustrating**, therefore additional payments should be due for the repeat occurrences.
- Learning that low pressure as a result of necessary works or drought was not included in the standard further diminished initial positive responses, as these are key reasons customers think of that cause low pressure.

"It's ridiculous you're only eligible for one payment a year. What if I get compensated right at the beginning of the year, but they don't fix the problem? Will they just leave the problem until next year?"

**HH customer**

"It doesn't cover the main reason why you might expect low pressure."

**NHH customer**

# Update standard to be more customer orientated, making it easier to access

## Development & improvements:

- **Responsibility for measurement needs to be clear** in the standard.
- If companies are responsible, **increase trust** by:
  - Being transparent about how and when pressure is measured.
  - Being open about how often low pressure is recorded.
  - Sharing how often this standard has been breached and paid out for, and share targets, to increase trust.
- If customers are responsible, **help customers understand the standard.**
  - **Clarify language:** language needs to be more 'user friendly', or at least explain industry-specific terminology (e.g., seven metres static head).
    - Some looked for more informal language, or examples of what to expect e.g., 'a trickle not a flow', however this is not universal
  - **Provide instructions:** some wanted easy-to-follow instructions, explaining how to measure water pressure.
    - Some customers felt that confusion could be remedied by using simple accessible techniques such as measuring the time it takes to fill a standard washing up bowl.

"Needs to be measurable by the customer. If the consumer can't measure it then it's pointless."

**PSR customer**

"Should be in clearer language, like saying 'trickle not a flow' or something."

**HH customer**

"All these standards need to be measurable by the consumer, for example you know if you've been without water for 48 hours – you're never going to know if its below 7 metres static head."

**NHH customer**



# Customers were mindful of the potential impact of climate change

## Development & improvements:

- **Increased instances of climate-related low pressure are expected**, so customers do want to be protected from increased instances of this in some way.
- Some suggested the 'drought' exception should be applicable a maximum amount of times a year, or only in instances where the water company could not have reasonably done anything to mitigate the issue of drought-related low pressure.

## Detailed discussion: Climate change & water pressure

- Customers are understanding that they might get lower pressure in a drought, as water resource has to be distributed according to priority.
- Climate change is expected to make this matter worse, and customers anticipate there being more droughts in the future.
- Therefore, a drought exception to this standard feels unreasonable to apply all the time, as water companies should be working to mitigate for climate issues like this.

- This is heightened by the idea that water companies waste a lot of water through leaks and other infrastructure issues.
- Some felt this exception should only be applied a maximum number of times a year, in order to balance customer needs (as they require appropriate compensation for persistent issues) and company needs (as customers understand the physical and practical impact of climate change on water supply).



# Customers struggled to apply this standard to themselves, so payment was difficult to assess

## Response to the current payment:

- Concerns were more to do with responsibility of recording/reporting low pressure, in order to be eligible for a payment, rather than payment amount.
- **HH:** 'fine'; difficult to assess given lack of understanding of potential impact.
- **NHH:** mixed responses. Some water critical businesses felt it needed to be much more if it has a significant impact on their day-to-day, however not universal due to a lack of understanding around the potential impact.

## Response to proposed payment:

- Not understanding how <0.7 bar of pressure could affect them made customers **feel this was a significant jump.**
- For many, breaches of this standard are not imagined to be as impactful as other standards, e.g., missed appointments. £75 then becomes the minimum that should be applied across all standards.

## Desired improvement to payment:

- **The biggest concern with payment was the 'once a year' limit.** Persistent issues become more annoying with time, so this feels unfair.

"I think the amount is ok, that's not the issue. It's the fact you can only get it once a year that's the problem."

**HH customer**

"You might as well have £75 for all of them...this isn't worse than staying home half a day, wasting time."

**HH customer**

## Minimum payments

	Current	Proposed
<b>HH</b>	£25	£75
<b>NHH</b>	£25	

# Low pressure: summary

## Relevancy

- This standard was initially met with surprise as many view low water pressure as a minor issue
- A lack of context and not understanding the impact that low pressure at this level might have even drives some feelings of apathy towards this standard
- The standard becomes somewhat more relevant when considering the knock-on impact in certain circumstances, e.g., medical needs, business needs
- Payment timescales feel unfair, and limit how relevant the standard might be, especially for those who suffer with low pressure persistently

## Updates

- Provide clarity on responsibility for measuring and reporting low pressure
- Include 'high pressure'
- Improve payment schedule to better reflect impact of ongoing low pressure, and better incentivise water companies to fix problems
- Apply 'drought' exception a maximum amount of times per year, given water companies should be anticipating issues relating to climate change increasing

## Payment

- Some struggled gauging fairness of current amount, as they didn't understand the potential impact of water pressure this low
- As many view low water pressure as a minor issue, some felt proposed payment was high in comparison to other standards
- One payment per financial year not suitable for repeated incidents

# 9 & 10. Flooding from sewers: internal & external

Initially, feelings towards these standards were very positive, however the exceptions significantly limit how relevant and fair they feel.

- While not frequently experienced, when flooding from sewers does happen it has a significant impact on customers. This is something customers need to be protected from, so as a standard it feels incredibly relevant.
- Relevancy was significantly limited by the exceptions, which many felt were unreasonable, and effectively rendered the standards useless for some.

## Standards as presented to participants:

### “Flooding from sewers – internal flooding.

- If waste/sewage enters a customer’s building from a sewerage company’s asset (i.e. a sewer or lateral drain), the company must make an automatic GSS payment.
- This payment must be made for each incident.”

### “Flooding from sewers – external flooding.

- If waste/sewage enters a customer’s land or property (including outbuildings) from a sewerage company’s asset (i.e. a sewer or lateral drain), the company must make a GSS payment.
- The customer must claim the payment from the company within three months of the incident.
- This payment must be made for each incident.”

# First impressions are positive, as customers feel happy that companies are doing the right thing

## Key positives:

- Everyone could easily see themselves being negatively impacted by flooding from sewers, making the standards **highly relevant even though it isn't a frequently experienced or even expected issue.**
- **Expected standards, as they directly link to the 'promise' water companies make to customers.** Keeping effluent out of properties is a key service water companies are expected to provide.
- **Water companies are taking responsibility** for a problem they've caused. This feels morally like the right thing to do, which is especially important given the necessity of water

and the lack of choice of supplier and therefore infrastructure, which even business customers have no choice about.

- **Significant issue to experience.** The potential impacts are far-reaching, from damages to both physical and mental health and to possessions and property. For businesses it could even result in a substantial loss of earnings, as well as damage.
- **Good that internal and external flooding is covered in the standards,** as both are severe.

"It makes perfect sense and I would expect nothing less."

**NHH customer**

"You pay a water bill for rain and drainage as well. So, if it comes into my house from a main drain I definitely expect compensation."

**HH customer**

"This is as severe as it gets."

**NHH customer**

"If it comes into my home it's disgusting, there's a big failure and a massive health risk."

**HH customer**

# Positive impressions are informed by assumptions about what the standards will cover

## Customer assumptions fundamentally effect thoughts on relevancy, fairness and suitability of these 'flooding' standards.

- Positive first impressions around water companies doing the 'right thing' are based on the standard seen without exceptions.
- There was an assumption that the standards would cover issues stemming from adverse weather. This may be due to homes flooding due to poor weather being the closest touchpoint customers have for waste and sewage entering homes.

- The potential monetary impact of this standard breach was most keenly felt for these standards over others. Many assumed that the payment would be related to the value of the damage caused. This may be due to physical damage being something that customers can more easily relate a price to, and the initial assumed similarities between the standards and an insurance policy.

Positive first impressions of these standards only lasted as long as customers did not know about the exceptions, specifically that it excludes issues caused by 'exceptional weather'.



"It's really good actually, think of if you lived somewhere like York, it's not just the flooding of your house you have to worry about, it's all your nearby [infrastructure] as well."

**NH customer**

"This is what I'd expect to see from a decent company, if it comes into my property and affects my business, they should be dealing with it, absolutely."

**NHH customer**

"Great to be able to get compensation for this. I've just had a load of work done at home, if waste ruined it, I'd need to replace it at significant cost."

**HH customer**

# Considering the seriousness of the potential impact, these standards are felt to lack clarity

## Conditions. Points for consideration:

- **Feels vague** for such an essential standard. The shortest standard covers the most complex and potentially most impactful issue. **These two standards can feel incomplete without discussing the exceptions.**
- Clarification wanted on **what constitutes an 'incident'**. Do multiple days of flooding constitute multiple incidents, or one? Is it to do with the number of days customers are impacted, or the source of the issue? These two things are considerably different for customers. **An ongoing issue might be 'one' incident for water companies, but could result in multiple instances of disruption for them.**
- Especially relevant for business customers, due to the potential revenue loss if issues persist over multiple days.

- Some feel **frustrated that there is no directive to organise/help with any clear up**. Water companies are seen to have a duty of care here, due to the specialised nature of cleaning needed.
- Some felt vulnerable customers particularly might need this, due to:
  - Mobility issues limiting ability to clean it themselves
  - Lack of immediate finances to hire cleaners if needed
  - Having time-sensitive needs, e.g., households containing pregnancies / newborns, or immunocompromised customers

"I think it's important how they recognise an incident. If it happens across various days, is that one long incident or separate incidents?"

**NHH customer**

"It's a bit vague.  
Am I missing half of it?"

**PSR customer**

"It's a biohazard! You'd need to get a specialist in, I can't believe they don't have to at least give you a hand with organising it."

**HH customer**

# Exceptions are key to understanding the standards, & fundamentally change attitudes

## Exceptions. Points for consideration:

- **Exceptions for these standards are felt to be the most significant** and the least fair.
  - 'Exceptional weather conditions' is felt to be the 'ultimate get out of jail free card' for water companies.
- **Standard 10 exceptions:**
  - Not being eligible for a payment for external flooding if one for internal flooding has already been made feels unreasonable.
  - Not being eligible for a payment if the flooding does not affect the customer 'materially' is also felt to be unfair; effluent on any part of a property is felt to be unacceptable, and therefore customers will always be 'materially' affected by it.
- **Confusion around responsibility and burden of proof.** Many don't feel they would confidently be able to say if the flooding was caused by their own actions, or what factors play into this, e.g., what about if neighbouring homes cause the issue? How is that provable?
  - There is also a level of distrust towards water companies regarding these standards specifically. Some questioned if companies would be totally honest about the cause of the flooding, and if they might try to shift responsibility back to customers.
  - This feeling was exacerbated by the frustration at weather conditions being an exception.

"Well all of a sudden that's pointless! They'll blame it all on the weather!"

**HH customer**

"Hardly seems fair that you only get one payment...why are they making you choose between your inside and outside?"

**HH customer**

"If it's coming up into my house, do I have to pay for a plumber to come round and check it's not my fault first? I'm not even really sure where my sewer pipe ends and theirs starts!"

**HH customer**



# Weather-related exceptions make these standards feel not fit for purpose for some...

Excluding issues caused by 'exceptional weather conditions' feels vague at best and unfair at worst. It is a real sticking point for many and can make these standards feel like 'empty promises' that water companies expect to never have to keep.

## Vague

Customers want to understand more about what is deemed 'exceptional', given that climate change is expected to increase instances of 'extreme' weather. What is the baseline for 'normal' weather? When does 'extreme' weather become 'not exceptional', which would then make the standards apply?

## Unfair

Customers have no way to mitigate this risk; only water companies are in any position to plan for this, so it should be their responsibility.

"I'd be interested to know how many incidents they've blamed on 'exceptional weather', and what they used to justify it."

HH customer

"How are they defining 'exceptional weather'?"

NHH customer

"Shouldn't matter what the weather is - they should be prepared for the kind of weather we can get in this country."

HH customer

"You can't legislate for a natural disaster, but if the water company knows it's going to be an issue, it's still their fault."

PSR customer

# ...however, customers agree it is complex

## Detailed discussion: potential impact of climate change in relation to weather-related exceptions.

While there was often an emotional response to this exception, and the overall feeling is that it significantly limits the relevancy of these standards, customers do see that it is a complicated issue.

### Initially: significant negative reactions upon learning about this exception.

It's seen as the water company's job to provide safe, clean water; looking after and 'futureproofing' their infrastructure is a part of this.

Therefore, water companies should be investing in infrastructure and research to mitigate issues like this, especially given the impacts of climate change.

### However: some feel that water companies cannot be prepared for every eventuality.

Due to climate change, new areas/assets might become at risk due to adverse weather. Asking companies to predict this feels like a 'big ask'.

This was a particularly involved discussion in HH groups, where personal interests were drivers for discussion, including various views on climate change, corporate responsibility vs. individualism, and perceived proximity to issues.

### Compromise: 'exceptional weather' should not apply as a blanket exclusion.

If an area/asset had not been a cause for concern before, or **had not** been identified as being at-risk in any other instance, weather exclusions are somewhat more reasonable.

If the area/asset had been identified as being at risk due to weather issues, that is when an 'exceptional weather' exclusion should not apply.

'Exceptional weather' also needs to be defined, for clarity of understanding and consistency across water companies.

# Remove barriers to qualifying for these standards, & increase clarity of 'incidents'

## Development & improvements:

- Increase clarity around **what constitutes an 'incident' of flooding**.
  - Customers also want the most generous definition of this applied, i.e., each day effected by flooding as 'an incident'.
- **Allow customers to claim under both standards 9 and 10**. Flooding internally and externally are two separate issues for customers to deal with; compensation availability should reflect this.

## Standard 10

- **Remove need for flooding to have affected customers 'materially' or broaden definition to include emotional distress**. Customers assume that any kind of waste flooding will have a significant impact on them, if not physically then certainly emotionally. Companies should not be allowed a 'no harm, no foul' rule at their own discretion.

# Strong feelings that these standards should cover more, & provide customers with more help

## Development & improvements:

- **The 'exceptional weather conditions' exclusion is felt to need a significant update.** While some called for complete removal, many were open to at least have the terms updated to feel more relevant in 2023 and going forwards.
  - 'Exceptional weather' needs definition, to ensure clarity for customers and companies.
  - Exception should not apply if area/asset has already been identified as being at risk due to exceptional weather; is it then the job of the water company to address this.
- **Companies should have a duty of care to help with clean-up**, especially given specialist agencies might be needed, including:
  - Arranging the clean-up (minimum)
  - Paying directly for the clean-up (ideal)
- Some did want effluent entering their properties via any route to be covered, e.g., including from river flooding, as water companies are considered to be responsible for all waste.

# Initial response to current payments is very poor; it feels very low for the potential damage

## Response to the current payments:

- Payment terms are not well understood, due to participants generally not knowing what their sewerage bill was.
  - In the absence of this knowledge, they are taking the upper available limit to base their assessment on.
- Even assessed using the maximum payment amount, responses towards payments were very negative.
- These payments are being **anchored against the idea of an insurance payout**, as that is the closest context customers have. The payments being significantly less than this makes them feel particularly unfair.

- Customers feel that **payments should cover both the practical and the emotional impact** of effluent entering properties. The current payments are felt to be inadequate for this.
  - Especially true for NHH customers, who were thinking not just the damages caused initially (e.g., asset damage of equipment/stock) but also the **potential long-term impact** to their business (e.g., potential reputational damage, closing for clean-up resulting in loss of earnings).
- Also, true if enters home of a vulnerable customer/household, as the hygiene impact can be even more significant.

“They can’t believe that’s enough. Even the top end won’t cover a lot. I know I won’t be paying that.”  
**PSR customer**

“£1,000 if literal poo comes into your house is insulting.”  
**HH customer**

### Minimum payments

	Current
<b>Internal</b>	Annual sewerage charge (min. £150, max. £1,000)
<b>External</b>	50% of annual sewerage charge (min. £75, max. £500)

# For most, payments for these standards should be equal to the damaged caused

## Response to the current payments:

- Many feel it is not fair to have a maximum payment, but instead it should be **equal to the damage caused** at a minimum.
- This could look like the water company either a) organising and paying for the clean-up, plus any additional damages incurred or b) paying the total amount it costs to fix the damage direct to the customer.
- Almost all wanted a payment for the emotional distress caused in addition to the above.
- The low amounts also made some question why there was such a difference between the Internal and External flooding amounts.
- Some brought up that they themselves/people they know have spent a significant amount of money on their outside spaces due to Covid-19, and it doesn't feel fair to value these spaces 'so little'.
- This again links to the idea that the amount paid should be directly linked to the damage.
- However, realistically people are accepting that there is a practical and emotional difference between internal and external flooding. Customers generally felt that it would be **more acceptable to have different amounts for internal and external flooding, if the amounts were appropriate** (i.e., linked to the damage caused).

"It's not fair to have a maximum. If they've ruined my home, they should pay for that."

**HH customer**

"I can't believe this is all you get. This should be something you get as well as the cost of the damage, for the inconvenience and stress."

**HH customer**

## Minimum payments

	Current
<b>Internal</b>	Annual sewerage charge (min. £150, max. £1,000)
<b>External</b>	50% of annual sewerage charge (min. £75, max. £500)

# These standards prompted discussion around what the payments were intended to cover

- While initial responses were consistent across depth interview and focus group methodologies, **those in groups were more likely to discuss payment terms further**, with some presenting opposing views after consideration.
- Given the amount of variables in these hypothetical discussion, no significant conclusion was reached.
  - Some felt it was a 'sorry' payment, and the amount was appropriate.
  - Some felt it was a 'sorry' payment, but it was still too low.
  - Some felt it should cover all damages, and should replace an insurance claim.

## Detailed discussion: Payment for damages vs. payment as apology

Some considered that this payment was in addition to their own personal home/business insurance, rather than 'instead of'.

This was a point of debate in some groups, with two main schools of thought:

- Some felt that this was fine as an 'additional' payment to their own insurance, as instances like this are what it's there for.
- **Note:** *most still using the upper limit to inform this view.*
- Some also anticipating that cleaning would be provided by the water company, in addition to this 'sorry' payment

- On the other hand, some felt that it wasn't fair that they would have to claim against their insurance:
  - It wasn't their fault – not only can they not mitigate for this, their water company has 'admitted' fault in this instance
  - Claiming could increase their future premiums
  - Claiming can be very stressful, and should be down to the company who did the damage



# Suitability of proposed amount still questioned, as purpose of payment is unclear

## Response to proposed payment:

- **NHH:** as with other standards, NHH customers were not shown proposed payments. Suggested payments were generally reflective of idea that 'it needs to cover damages'. Cleaning being covered in addition to any payment was expected at the very least.
- **HH:** positive that the minimum levels were going to be doubled, but most still called for the **maximum to be lifted** and **payment amounts reflecting the amount of damage caused**.

"If this is a goodwill payment, and you get closer to the maximum, I think that's maybe fine. But it depends on everything else we've discussed."

**HH customer**

- For some, a key issue faced when assessing the new payments was around the question of **what the payment is supposed to cover**.
  - As a goodwill payment, this is better.
  - If it doesn't include any help from the water company to organise or pay for cleaning, this still isn't enough.
  - Again, these views are generally based on receiving the maximum amount.
- Some also questioned if external flooding was only 'worth' 50% of the emotional distress of internal flooding, and still wanted to see these amounts closer to each other (both linked to damages).

"I don't know what to say to this. It's still not covering potential damages. You need to get rid of the maximum."

**HH customer**

## Minimum payments

	Proposed
<b>Internal</b>	Annual sewerage charge (min. £300, max. £1750)
<b>External</b>	50% of annual sewerage charge (min. £150, max. £1,000)

# Flooding from sewers: summary

## Relevancy

- Low levels of personal experience but anticipated high impact makes standards feel very relevant
- Initially feels good that water companies are taking responsibility for an issue they've caused
- Usefulness of standards significantly limited by exclusions, including 'exceptional weather'

## Updates

- Water company should help with clean-up due to the assumed specialised nature of job
- Needs to be updated to ensure water companies take responsibility for future-proofing their infrastructure against climate change
- Increase clarity around definitions of 'incident', 'materially effected' and 'exceptional weather'
- Remove 'exceptional weather' exclusion if area/asset has already been identified as being at risk from weather events
- Allow payments under both standards per incident if applicable

## Payment

- Payment terms felt to be unacceptable
- Significant confusion around what the payments are for
  - Heightened for these standards, as they are felt to be potentially the most impactful financially
- Feelings that payments should cover both practical and emotional damages, and be linked to this; not capped at a maximum amount
- Minimum levels need to be higher for both standards if cannot link to cost of damage

A large, stylized, light blue 'CCW' logo is positioned in the background on the right side of the page. The letters are thick and rounded, with a slight shadow effect, giving it a three-dimensional appearance. It is oriented diagonally, following the same angle as the smaller logo in the top left.

ccw

The voice for water consumers  
Llais defnyddwyr dŵr

# Summary review

# Objectives review: understand bill payer's views on the current guaranteed standards, including are there any gaps

- Customers have fairly low expectations for water company standards.
- Potential standards are expected to be 'business critical' and relate to supply, i.e., provide clean, safe water, consistently, and cause minimal negative environmental damage.
- Customers have very low levels of awareness of the Guaranteed Standards Scheme. Increasing awareness of these could have positive reputational impact.
- First impressions: mixed but broadly positive, with there being more standards than expected.
- Cynicism towards standards is driven by questions around enforcement.
- On first impressions, some feel that there are water quality/cleanliness, and wider environmental standards missing.
  - While these may be more applicable to an overall company strategy and not to individual customer standards, customers are still looking for standards relating to this. These standards would provide them with reassurance that the main thing they expect from their provider – a provision of clean, high-quality water – will be protected, and held to an appropriately high standard.
- However, it is hard for customers to assess gaps in the GSS, especially before going through standards individually. There may be other standards that customers would want if they knew they were an option. As not many have had issues with their water companies, they feel they 'don't know what they don't know'.

# Objectives review: understand bill payer's views on the current guaranteed standards, including are there any gaps

## On reviewing the standards, some more gaps were identified:

- **Standards relating to more general complaints, not just supply**
- **High pressure**
- Many did feel that significant issues with the 'exceptions' of standards were akin to having gaps.
- **Weather-related exceptions can make standards feel tokenistic, and even pointless for some. So, while some issues are technically covered (e.g., low pressure, flooding), it may still feel like this is a 'gap' in the standards due to the significance of the exception.**
- There is a view that water companies should be preparing more for the impact of climate change, including issues resulting from more severe weather conditions.
- This is especially important given that HH customers cannot choose their water supplier.

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

- Impact of standards not being met directly informs how fair standards and therefore payments feel.
- There is some confusion around what the payments are supposed to be for, which impacts how appropriate amounts are
- Payments are seen as being apologies for the inconvenience caused to customers, as a somewhat punitive measure for companies to ensure they have a financial motivator to improve, and in some cases as direct compensation for costs incurred.
- There is a lack of clarity on how customers can access payments:
  - How are the standards monitored, and who's responsibility is it to report breaches?
  - How are standard breaches assessed, and how to water companies decide who to pay?
  - What triggers the 'automatic' payments?
- This lack of transparency can impact how 'fair' payments feel. More involvement from the water company can make payments feel not impartial, whereas putting the onus totally on the customer feels unfair given the limited amount of awareness of the standards.
- **There is a variety of attitudes towards appropriateness of current levels of compensation.**
  - **Generally, standards relating to supply are not felt to be appropriate, as this is seen as a major service failure from the water company.**

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 1. Making appointments

- Current payment generally acceptable, as it's such a surprising standard to see
- Increase is appropriate given increases to other standards

### Updates:

- Proactively inform customers of shorter time slot availability

## 2. Keeping appointments

- Current payment not enough; it doesn't reflect the inconvenience caused by a missed appointment
- Proposed payment more reasonable, when compared to national minimum wage, and respondents' own water bills
- Key standard where future payments need to keep up with at least minimum wage

### Updates:

- Prioritise rebooking for customers who have had appointments not kept
- Some vulnerable customers might benefit from help with rebooking



# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 3. Account queries and requests about changes to payment arrangements not actioned on time

- **HH:** current payment reasonable if there is no negative consequence for customer
  - Additional compensation should be due if breaching this standard results in a negative financial impact for customers
- Some feeling the proposed payment is high when compared to other standards, however, should still increase as others have increased
- **NHH:** current payment not acceptable due to opportunity cost of time spent chasing response
  - Compensation amount should increase with every additional day over the initial period of non-response

## Updates:

- Wording around communication stipulation causes confusion; if this only means written letters, this needs to be updated to reflect modern communication methods
- Also needs to be updated to clarify what a 'substantive' response is
- Timescales for both queries and requests should be the same at five days

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 4. Written complaints not actioned on time

- Current payment amount is reasonable for low-stakes complaints; proposed amount more appropriate for more complaint types (i.e., both low- and higher-stakes complaints)
- More severe reasons for complaints should be compensated more when not replied to in the given timeframe, considering the potential emotional distress

## Updates:

- Wording around communication stipulation causes confusion; if this only means written letters, this needs to be updated to reflect modern communication methods
- Also needs to be updated to clarify what a 'substantive' response is
- Reduce timescales to five working days (same as response to queries and requests)
- Some desire to include an additional, longer timescale for solution/resolutions
- Widen standard or include a further standard for general complaints, as this standard only refers to supply or sewerage provision related complaints

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 5. Incorrect notice of interruption to supply

- As the payment feels directly linked to potential expenditure incurred due to standard failure, the current amount is not acceptable
- Proposed amount more acceptable for household customers
- May not be the case for business customers, who may experience a more significant financial impact

## Updates:

- Need to include provision of water in standard
- Timescales should be expanded as work is 'planned'
- Longer timescales needed for interruptions for more than four – eight hours
- This could be especially relevant for vulnerable customers who may have care-related water needs
- Ensure multiple channels used to try to inform customers, not just written letters

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 6 & 7. Supply not restored, initial period & each further 24 hours

- Current payments unacceptably low, due to significance of impact
- Especially true for NHH customers
- Proposed payment more positively received
- Large proportional increase in relation to current amount makes customers feel water companies do see this as a 'real' issue

## Updates

- Need to include provision of water in standard
- Vulnerable customers should receive additional support, based on needs, during the interruption time
- Compensation amounts for each further 24 hours should increase as time goes on, proportional to increased impact of being without water for longer
- Consider a pro-rata approach to payment timescales, ensuring customers do not lose out if their supply is restored just minutes before the deadline

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 8. Low pressure

- Current payment feels fair, however is the most difficult to gauge fairness of, given limited experiences of pressure as low as 0.7 bar
- Due to perceived low relevance and impact, revised payment can become the benchmark for other payments
- One payment per financial year not fair for repeated incidents

## Updates:

- Significantly more clarity is needed on responsibility for measuring and reporting low pressure
- Issues relating to high pressure are missing, if low pressure is covered
- Drought exclusion unfair to apply as an absolute, and should only be allowed to be used a maximum number of times a year/if the company could not have reasonably done anything to prevent low pressure caused by drought

# Objectives review: understand bill payer's views on the appropriate minimum levels of compensation for different service failures

## 9 & 10. Flooding from sewers: internal and external

- Payment wording can be confusing, due to limited participant familiarity with their sewerage bill
  - Payment terms felt to be unacceptable, with significant confusion around what these payments are for
  - Expectations are shaped by what customers think happens if they make a claim on their insurance i.e., they expect to be paid in full for all damages
  - Customers feel payments should cover both practical and emotional damages, with no maximum amount
  - Exceptional weather condition makes standard feel even less fair
  - Also, unfair to not be able to claim under both standards if internal and external flooding is experienced
- Updates:**
- Water company should help with clean-up, due to anticipated specialised nature of job needed
  - Clarify language around 'incident', 'materially effected' and 'exceptional weather'

# Objectives review: should different service standards apply for customers who are vulnerable/ have been identified as needing extra help, including those on Priority Service Registers

- Customers want standards to be equitable, not equal.
- A level of individualism is looked for when applying standards, as the impact felt may be significantly differently depending on the reasons that customers might be on the PSR/have been identified as being vulnerable.
- Most feel that vulnerable customers should not necessarily receive different amounts of compensation.

- **Some customers should receive different standards on a standard-by-standard and case-by-case basis. This should not be applied to all 'vulnerable' customers as an absolute, i.e., those who are vulnerable due to medical needs need different kinds of help vs those who are vulnerable due to financial difficulties.**

## Key standards where this is applicable:

- 2. Some vulnerable customers might benefit from help with rebooking
- 5. Longer timescales needed for notice of 'planned' works
- 6&7. Vulnerable customers should receive additional support, based on needs, during the interruption time





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