Executive Summary

This report gives the findings of research undertaken by Risk Solutions and Marquis and Lord for the Drinking Water Inspectorate (DWI). The overall aim of the research was to identify the current practice and policy of English and Welsh water companies when giving advice to customers about discolouration, taste/odour and chemical contamination events. We were also asked to identify best practice and conclude whether there is a need for generic guidance.

All water companies in England and Wales agreed to participate in the research. As part of this work we:

- Collected information and materials from the water companies. This was primarily information about standard telephone enquiries and complaints. However it also included website information, leaflets, direct letters to customers and any special guidance.
- Examined how companies advise customers both for individual complaints and when incidents have been identified.
- Carried out a critical review of the information and materials produced and advice given. This considered accuracy, appropriateness, timeliness, ease of understanding and clarity of the material’s key messages.
- Examined processes for communicating with customers about different levels of event.

This report describes the current practices that our research found in the industry and highlights good practice. Further we have identified areas where we believe generic guidance for the water industry would be useful.

Key findings about processes

We find that the detailed implementation of communication processes varies between companies. However, they follow a reasonably consistent life-cycle, with distinct activities in four key areas:

- Pre-event preparation
- Event detection and escalation
- Communication management
- Review and testing.

Water companies generally appear strong at receiving, understanding and classifying incoming customer complaints; they are systematic at ensuring appropriate people diagnose problems and advise customers; and many companies have built strong positive relationships with influential external groups such as Local Authorities (LAs) and Consultants in Communicable Disease Control (CCDCs).

However, we did find the following areas of weakness, or variability across the industry:

- Methods used to identify customers with particular secure water or communication needs vary; while most companies include notices with water bills, there are a number of good practice examples of additional engagement that could be implemented more widely
- Processes and criteria for escalating consumer contacts about discolouration, taste and odour events vary widely across the industry
- Processes for ensuring and testing the clarity of advice and communication materials tend to be informal and confined to in-house personnel
Companies rarely test their material with customers for clarity or to ensure that the right messages are being received.

Key findings about communication materials
We find that water companies generally produce material that is clear and readable. Furthermore, technical issues appear to be handled well in the majority of cases and advice is generally accurate and correct. Where appropriate, documents are usually personalised for the reader and situation; they often acknowledge the customer’s concerns and the company’s role in resolving them. However:

- Most material is slightly less easy to read than recommended levels based on readability indices
- There is considerable variation in overall readability both within companies and between companies
- Poorer scores and larger variations in readability are observed for documents that are customised or produced by a range of authors; this suggests that differences in style and skill level contribute to the loss of clarity.

Another key observation from our work is that industry-wide documents are helpful. They are usually produced in collaboration or with contributions from a wide range of companies, are subject to peer review and are based on Plain English guidelines. This means they are a highly effective way to:

- Improve overall standards by example
- Provide the industry with documents that they can refer to and distribute
- Provide source material for use in companies’ own documents.

One specific area raised by a small number of companies was the need for central guidance relating to lead. This includes the planned reduction of exposure standards and the need for a long-term national policy on sustainable solutions to localised problems of lead pipes.

The need for guidance
Water companies themselves did not feel that there was a strong need for guidance; they also saw little benefit in more prescriptive requirements.

We agree that much of the communication by water companies is very good. However, there is a need to ensure that the same high level of quality and consistency is achieved across all companies and communication channels.

Furthermore, while there are only a few ‘inset licence’ companies at present, their number is expected to increase and the nature and experience of their staff may initially be more variable than within existing water companies. Clear communication between these companies and existing water suppliers is important, and Inset companies are likely to benefit significantly from shared good practice.

Our analysis suggests that there is a range of general examples of good practice approaches for each stage of the communications cycle. We believe that sharing these ideas, and ensuring that companies have access to more formal guidance will help to achieve the desired increase in quality and consistency. We recommend that the following areas require the most attention:

- Sharing good practice to improve the ways in which companies identify customers with particular secure water or communication needs.
- Selecting criteria for escalating discolouration, taste and odour events internally and externally. We do NOT recommend that these should take the form of prescriptive numeric trigger points. Instead, we suggest that guidance on how to determine practical indicative trigger points may be useful.
Methods for incorporating Plain English principles into material preparation and paying attention to the good practice principles introduced in Section 6.

Testing communication materials for clarity before issue, and confirming that key messages have been transmitted after receipt, including:

- Increased use of peer-review of materials prior to issue
- Increased development of pre-prepared, quality assured and tested source materials that can then be adapted for specific communication needs
- Advice on how best to balance pre-prepared material with bespoke adaptation
- Checking bespoke communications prior to issue.

DWI may wish to provide generic guidance about these issues. However, we believe that much of this detailed information could form a compendium of good practice examples already implemented by water companies. Such a guide could be accessed, adopted and adapted by other water companies for their own application.

Two areas for specific consideration by DWI are:

- How to encourage appropriate communications between inset license holders and water companies to ensure this happens
- The requirement for guidance on lead issues (in the light of the new standards), and the need to identify an appropriate strategy for dealing with localised problems with lead pipes.