



DRINKING WATER INSPECTORATE

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1 December 2022

Information Letter 04/2022 Revised

To: Board Level and Day to Day contacts of Water and Sewerage Companies and Water Companies in England and Wales

Dear Sir/Madam

Annual Provision of Information on Consumer Contacts

First published 25 August 2022 – Revised (page 4) and republished 1 December 2022.

The new requirements of this letter regarding social media contacts are effective from 1 January 2023.

The new requirements of this letter regarding the recording of multiple water quality issues per contact are effective from 1 January 2024.

1. Purpose

The purpose of this letter is to update our Information Letter 01/2006, providing companies with guidance on the provision of information to the Inspectorate in respect of sections 9 and 10 of the Water Industry (Suppliers' Information) Direction 2021 relating to the reporting of consumer information about drinking water quality.

2. Background and Changes

Since the introduction of the requirement to report annual consumer complaint figures in 2005, the wider industry has collaborated on the Discover Water project with the aim to provide consistent, comparable information to consumers. Consumer

contact information is included on the Discover Water website based upon the criteria in IL 01/2006. Whilst the criteria for categorising consumer contacts is unchanged this letter is updated to take account of changes in communications, especially the increased usage of social media.

The requirement to report contacts related to drinking water quality events is made clearer in paragraph 4.6, note 2, and additional guidance is included in paragraph 4.1 on recording of contacts in which consumers report multiple water quality issues.

3. Definitions

This section sets out definitions to be used by companies in making their returns. These definitions are hierarchical: first a consumer contact about drinking water quality is defined (3.1) followed by definitions for five categories (subsets) of consumer contact (3.1.1 through to 3.1.5). More detailed guidance (with examples) on the application of these definitions follows in section 4. A pragmatic approach has been taken in developing the guidance, so it reflects the broad range of consumer contacts received and recorded across the industry. It is recognised that some companies may receive few, if any, contacts in some of the categories.

3.1. A consumer contact about drinking water quality

This requirement is defined as any communication about drinking water quality initiated by a consumer living or working in the area supplied by the water company including, but not limited to phone, letter, fax, email, in person, social media message or post for example Twitter, Facebook and Instagram, website request form and message left on a helpline.

For webchat and social media contacts, in the event companies ask consumers to provide their telephone number for the company to contact them over any issue, then the company call back should be treated as initiated by the consumer, if the consumer reports any matters relating to their water quality. All advertised company handles should be included in the measure of water quality contacts. Posts about water quality that are not on the advertised company handles should not be reported for the purposes of this letter. However, such posts may constitute 'local or national publicity' and be reportable as an event under section 9(1)(d)(ii) of the Water Industry (Suppliers' Information) Direction 2021. Consumer comments about another consumer posting should not be reported as a water quality contact.

There are five categories of consumer contact that should be recorded. These are defined as follows:

Table 1: Consumer contact enquiries

3.1.1	A consumer enquiry about drinking water quality	A contact made solely with the intent of eliciting information from the company about drinking water quality, in the absence of any expression of concern, dissatisfaction or service shortfall.
3.1.2	A consumer contact about the appearance of drinking water	A contact where the consumer perceives something different about the appearance of the water from the “norm”.
3.1.3	A consumer contact about the taste and odour of drinking water	A contact where the consumer perceives that the water has a taste or smell.
3.1.4	A consumer contact about illness	A contact where the consumer attributes specific symptoms of illness to the water, including reports of illness amongst family members of the household, within their workplace or at another location such as a school.
3.1.5	A consumer contact about a water quality concern	A contact where the consumer expresses a concern about drinking water other than its appearance, taste or smell and they are not attributing symptoms of a current illness to the water.

4. Applying the definitions

This section provides guidance to help company staff with assessing and recording consumer contacts about drinking water quality.

4.1. General principles

Not every consumer contact will be a “customer complaint”. The definition of a consumer contact is wider and aimed at gaining an understanding of the public perceptions of drinking water quality. There is no need to establish “dissatisfaction”

or a “shortfall in the level of service” as a feature of a consumer contact for it to be recorded in the dataset.

Some consumers may refer to more than one matter during a single contact; for example, a consumer may wish to query their bill at the same time as commenting on their drinking water quality. Companies must ensure that these “multiple contacts” which deal in part with drinking water quality are recorded as a consumer contact about drinking water quality.

If the consumer is reporting multiple water quality issues in a single contact, for example an odour issue as well as discolouration, this should be logged appropriately ~~as multiple contacts under the relevant definitions~~ **using more than one ‘definition’ as detailed in section 4 of this letter. Companies should be recording multiple water quality issues per contact from 1 January 2024. The Inspectorate will provide further instructions to companies on how to report this data to us at a later date.**

If a consumer contacts the company on more than one occasion about the same aspect of their drinking water quality this should only be recorded as a single contact if the second, or subsequent contacts, are progress seeking in nature, such as asking for results of testing. It is particularly important that the company does not judge for itself but establishes from the consumer whether any second or subsequent contact is perceived to be a new event or a continuation of the former one. Where this remains unclear each contact should be separately recorded in the dataset.

4.2. Applying the definition of a consumer enquiry about drinking water quality

A contact should only be recorded as an enquiry if the sole nature of the contact is seeking information from the company. If there are other elements to the contact then these should take precedence in deciding how to classify the contact, for example “my water tastes of chlorine, can you tell me the amount in my water” would be classified as a consumer contact about the taste and odour of drinking water whereas “can you tell me how much chlorine is in my water” would be classified as an enquiry. If the request for information by the consumer is clearly driven by worry or anxiety for the wellbeing of themselves or members of their household then the contact should be recorded as a consumer contact about a water quality concern (see section 4.6).

Companies should record enquiries using the four categories below:

- request for information about the **fluoride** level.
- request for information on **water hardness**, typically for the purpose of operating a domestic appliance.
- request for a **water quality report**.
- request for **other information**.

Typically, but not exclusively, these will be asking about some aspect of how the water is treated or the source it comes from, alternatively they may be asking about drinking water quality standards or how drinking water quality is regulated. Only classify an enquiry in this category if it requires an answer to be specially prepared by the company's water quality scientist, do not record enquiries that are so routine that they are answered by sending out a standard leaflet or fact sheet or an education pack for schools.

Note 1: the emboldened words are the subcategory names for reporting the data.

4.3. Applying the definition of a consumer contact about the appearance of drinking water

A contact should be recorded in this category only when the consumer's concern about their drinking water quality is clearly based on an observation (or a perception) that its appearance is other than "normal".

Companies should record these contacts using the categories below:

Table 2: Appearance of water categories

1	Discoloured water – brown/black/orange	The colour of the water is the focus of the contact even though this may be understood by the company to be accompanied by mains deposits suspended in the water (also include here staining of laundry due to discoloured water and concerns arising from problems with tanks and boilers due to mains deposits after a burst).
2	Discoloured water – blue/green	The colour of the water is the focus of the contact (do not include here if the colour is only mentioned as being present on deposits adherent to a tap, bath

		or shower tiles/tray – these should be recorded in the General Conditions category, see below)
3	Particles	The focus is reported as visible particles, either floating in the water or settled out in the bottom of a glass or jug (the water would be reported as clear).
4	White – air	The contact refers to white or milky looking water and the glass test confirms that the cloudiness clears from the bottom up leaving no sediment.
5	White – chalk	The contact refers to white or milky looking water and the glass test confirms that the cloudiness clears from the top down leaving white sediment on the bottom.
6	Animalcules	The contact refers to seeing a creature, living or dead, typically these will be either chironomid larvae or <i>Asellus</i> but include here any contact where a specimen is subsequently provided and identified by the company's water quality scientist as an aquatic animal. (Exclude contacts about slimes adhering to a tap or water fitting – these should be recorded in the General Conditions category, see below).
7	General conditions	The contact relates to the appearance of a deposit or slime or colour that is present on the outside of a tap or water fitting, included here are contacts about hardness deposits in kettles, staining of the sink, bath, shower cubicle, tiles etc. This category of contact deals with common consumer concerns where the water itself appears normal (it is clear and bright in appearance and free from taste and odour) and the phenomenon is arising within the household environment. A typical cause being inadequate ventilation combined with the use of aerosol dispensed household or personal products. This category should also be used for contacts relating to the quality of water in hot water systems or heating/cooling systems and humidifiers.

4.4. A consumer contact about the taste and odour of drinking water

A contact should be recorded in this category only when the consumer's concern about their drinking water quality is clearly based on an observation (or a perception) that its taste or odour is other than "normal".

Companies should record these contacts using the categories below:

Table 3: Taste and odour of water categories

1	Chlorine	The consumer states that the taste or odour is due to chlorine in the water. This category will include all chlorine related descriptions, for example, TCP taste, disinfectant/medicinal odours on boiling a kettle or taking a shower, smells like a swimming pool (exclude burning sensation in the mouth – these should be classified as illness as the description relates to a symptom not to the water).
2	Earthy/Musty	The consumer description of the taste or odour is such that it is clear they perceive a natural taste or odour relating to soil or vegetation (include here specific tastes known to be due to algae such as 2-MIB or geosmin as well as general descriptions such as musty or stagnant, companies may wish to use this category for recording contacts where the investigation has shown conditions that give rise to warming of the mains water supply, long runs of pipe etc).
3	Petrol/Diesel	The consumer description of the taste or odour is such that they clearly perceive the presence of petroleum or hydrocarbon-based substances (include here specific odours such as petrol, diesel, creosote, as well as general descriptions such as oily, solvent).
4	Other taste or odour	This category covers the less frequently encountered tastes and odours such as bitter, metallic, sweet, salty/saline. This category should also be used for

		any taste or odour not specifically mentioned in any other taste and odour category. Care should be taken in classifying contacts reporting a metallic taste because some consumers describe chlorine in the water in this manner.
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4.5. A consumer contact about illness

A contact should be recorded in this category whenever the consumer reports symptoms of ill health in their household or workplace or some other location such as a school and attributes these symptoms to the water.

Companies should record these contacts using the categories below:

Table 4: Illness categories

1	Gastroenteritis	The symptoms are described as one or more of the following: sickness, diarrhoea, vomiting, nausea, bilious (or equivalent lay terms such as stomach upset). This includes confirmed cases of cryptosporidiosis.
2	Oral	The symptoms relate to when water is taken into the mouth (include here descriptions such as sore throat, burning sensation on tongue or when swallowing, heartburn).
3	Skin	The symptoms relate to a sensation (irritation, itchy) or a change in appearance (red, blotchy, dry, flaky) of the skin anywhere on the body (including the scalp and hair condition). Include here reports of results of tests on hair or patch tests for allergies where positive findings were attributed to tap water.
4	Medical Opinion	This category should be used when it is clear the only reason for the contact by the consumer is advice they have been given by a doctor (or some other health professional such as a nurse, health visitor, consultant, or surgeon) along the lines of “my doctor said tap water was bad for me”. The

		advice may be verbal or in the form of a leaflet provided by the doctor or the health professional. Exclude from this category any contacts where consumers are reporting a confirmed diagnosis of cryptosporidiosis, these should be included in the Gastroenteritis category above. Also exclude contacts where the medical advice is indirect such as a doctor writing in a magazine or on the internet or interviewed on TV, radio, internet (see section 4.6 for how to record these contacts).
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4.6. A consumer contact about a water quality concern

A contact should be recorded in this category whenever the consumer reports a concern about their drinking water quality other than its appearance, taste or odour; they are not reporting symptoms of a current illness; and the contact is not a straightforward request for information (see section 4.2 above). Companies should record these contacts using the categories below:

Table 5: Water quality concern categories

1	Pets and Other Animals	The contact is a concern about the drinking water quality in relation to the wellbeing of a domestic pet or an animal, not the consumer or their family members (include here fish, reptiles and birds as well as cats, dogs, etc.). This category will also include concerns regarding drinking water for animals kept for commercial purposes (such as aquaria, farms, studs, wildlife parks or zoos).
2	Lead and Other Analysis	The contact is asking for the water to be tested (mainly this will be about the presence of lead because there are babies or young children living or visiting the house, or it is a school building), but include here all contacts where the consumer's perception (not the company view) is that "water testing" is the reassurance they require about the quality of their drinking water. Companies may wish to record lead analysis requests as a discrete subset.

3	Lifestyle	The contact may be about any aspect (parameter) of water quality, but it is clear the contact was prompted by information the consumer has obtained from a newspaper or magazine article, from the internet or from a programme on the TV or the radio (this may also include references to historical water quality incidents in any part of the country or globally, for example Camelford, the US incident regarding lead in supplies or Franklaw <i>Cryptosporidium</i> incident). Contacts about the quality of bottled water as compared to tap water should be included here, as should contacts about the need to fit any domestic point of use treatment unit.
4	Incident related	<p>The contact is prompted by the water company issuing boil water or similar precautionary advice and the contact is not a straightforward request for clarification such as “do I live in the area affected”? Rather it relates to a concern that is not covered by the incident Q & A fact sheet prepared for use by company staff and it requires a specific reply by the company’s water quality scientists or medical advisor.</p> <p>Note 2: Companies are reminded that although excluded from this category, consumer contacts received in the course of managing a notified water quality incident are required to be recorded under an incident code and reported to the Inspectorate in the company’s 3 or 20 day incident report. (See section 6.2.2 and Annex). Furthermore, contacts that are excluded from other columns in the dataset because they are associated with water quality events or incidents must be included in column 34 of the submission (see column 34 of Annex A).</p>
5	Campaigns	The contact is responding to literature (or media reports) about a specific campaign relating to a

		substance or organism in drinking water (for example, contacts due to the activities of either the anti or pro fluoride lobby) or the contact is prompted by the aggressive marketing locally of devices which claim to remove “poisons” from the tap water. This category may also be used for contacts prompted due to business or regulatory Environmental Reporting, for example, if the consumer has made the incorrect assumption that drinking water is affected with respect to river pollution, endocrine disrupters in sewage works discharges, bans on chemicals etc.
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5. Format and Timing of Returns to the Inspectorate

Companies should send their annual returns to the Inspectorate in the form of a Microsoft Excel spreadsheet by 31 January each year. A template for this purpose and instructions on its use are provided in the Annex to this letter. The returns should be sent electronically to the Inspectorate’s Water Quality Data Unit at dwimonthlydata@defra.gov.uk.

6. Other Issues

6.1. Customer Complaints

Companies record customer complaints (contacts expressing dissatisfaction and indicating a service shortfall) for routine business reasons.

Since the early 1990s Ofwat and CCW have required companies to provide customer complaint information for the purpose of evaluating levels of service. However, the Inspectorate’s requirement for information about consumer contacts about drinking water quality (section 3.1) is different. The definition of a “contact” is wider than “a complaint” and looks at the public perception of drinking water quality through measurement of drinking water quality specific communications between the company and all consumers (not just bill payers). The recording and analysis of drinking water quality contacts in the way set out in this guidance has been practiced by the water industry for many years and the first papers publishing such information date back to the turn of the twentieth century (Metropolitan Water Board Annual Reports). There have been several substantial studies of the public perception of

drinking water quality, and these have all shown the valuable insights to be gained from the collection and analysis of such information. These insights could not have been attained from consumer satisfaction surveys or complaints handling process analysis nor by testing samples of water in the laboratory.

6.2 Exclusions and Inclusions

There are certain circumstances in which it is appropriate to exclude a contact from the data return:

6.2.1 Consumer contact relates to water supplied by another water company (do not include these contacts in the dataset).

6.2.2 During operational events, such as burst mains, the company may divert callers to a recorded message service as it is presumed that most of these calls are about no water or low pressure and consumers with a concern about water quality will call again and be recorded as a contact in the normal way. However, this is not always the case and there have been occasions when substantial numbers of discoloured water or quality concern contacts have been diverted to a message service. Although it is understood that these contacts cannot be assigned accurately to a category the number of these incident contacts should be estimated as accurately as possible (see Annex to this letter).

6.2.3. Contacts may be received by companies through their websites or social media handles. Many of these are from school children and college students seeking information to help them with an educational assignment – these contacts should be excluded from the dataset as many are not company specific. However, if a company sets up a drinking water area of its website specifically inviting consumers to use the facility to contact the company about their drinking water quality then these should be recorded in the dataset (see section 3.1).

6.2.4. Some companies have dedicated numbers for the public to ring and report specific matters such leaks or use of hoses in a drought (these are not contacts about drinking water quality).

6.2.5. It can be difficult to establish the nature of a contact, for example, where English is not the first language of the caller, or the call is made on behalf of a consumer by somebody else. Companies are expected to take all reasonable

steps to establish if a call is a contact about drinking water quality and where it is unclear to take the precautionary approach by including such contacts in the dataset.

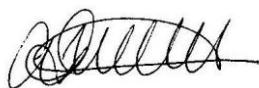
- 6.2.6. When a contact is investigated because it is also a “complaint” and the complaint is subsequently considered to be unjustified, the contact should still be retained in the dataset. However, when a company receives frequent contacts from one consumer (or household) over a long period of time (sometimes referred to as a vexatious caller) and another agency, such as CCW, the local authority or the Inspectorate, has investigated the matter and concurs with the companies’ judgement, all the contacts from the consumer can be recorded as a single contact.
- 6.2.7. Contacts from representatives of consumers such as a local councillor or an MP usually relate to a water quality incident or to a consumer’s complaint and inclusion of these would duplicate information already recorded.
- 6.2.8. Some contacts relate to the quality of drinking water in a public building or commercial premises and involve several different callers. These may be recorded as a single contact if they clearly relate to the same building or water system.
- 6.2.9. On investigation some contacts will be found to relate to a private supply of water and not the company’s public water supply (exclude these contacts).

Copies of this letter are being sent to

Christine McGourty, Chief Executive, Water UK; Davide Minotti, Deputy Director Water Services, Department for Environment, Food and Rural Affairs; Eifiona Williams, Water Management Team, Welsh Government; Sue Petch, Drinking Water Quality Regulator for Scotland; Berni Corr, Drinking Water Inspectorate for Northern Ireland; Alice Laycock and Emma Clancy, CCW; Alison Cullen and Paul Martin, Ofwat; Anne Dacey, Environment Agency; Benedict Duncan, Food Standards Agency; Stephen Robjohns and Anna Ireland, UK Health Security Agency.

This letter is being sent electronically to board level and day-to-day contacts. Please acknowledge receipt by email to dwi.enquiries@defra.gov.uk. Hard copies are not being sent but the letter may be freely copied.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Annabelle Edwards', with a stylized, cursive script.

Annabelle Edwards
Principal Inspector

Annex to Information Letter 04/2022

A template is provided with this letter in the form of a Microsoft Excel Worksheet for returns of information in respect of section 10 of the Water Industry (Suppliers' Information) Direction 2021. The spreadsheet is formatted as follows:

Column No		Notes
1	Water supply zone name	
2	Population in the water supply zone	
3	Total contacts enquiries (definition 3.1.1)	
4-7	sub categories (section 4.2)	
8	Total contacts appearance (definition 3.1.2)	This relates to the data collected for the Discover Water website
9-15	sub categories (section 4.3)	
16	Total contacts taste/odour (definition 3.1.3)	This relates to the data collected for the Discover Water website
17-20	sub categories (section 4.4)	
21	Total contacts illness (definition 3.1.4)	
22-25	sub categories (section 4.5)	
26	Total contacts quality concern (definition 3.1.5)	
27-31	sub categories (section 4.6)	
32	Zone total (sum of Columns 3, 8, 16, 21, 26)	
33	Zone rate (contacts per 1000 population)	Calculated: zone total contacts (column 32) divided by population (column 2) multiplied by 1000, reported to 2 significant figures. Do not calculate a zone rate if the zone population is less than 100 or the number in column 32 equals zero.
34	Total number of water quality incident contacts	See section 6.2.2 in IL 04/2022.

Columns 2 – 31 and 34 should each be totalled so that the final row of the work sheet provides company totals. Columns 32 and 33 of this final row should be completed with the overall company total number of contacts and the company overall company contact rate.

The template includes two rows of dummy data as an example for users of data entry and calculations.

Companies should retain the data from which these summary returns are prepared for a period of at least three years.