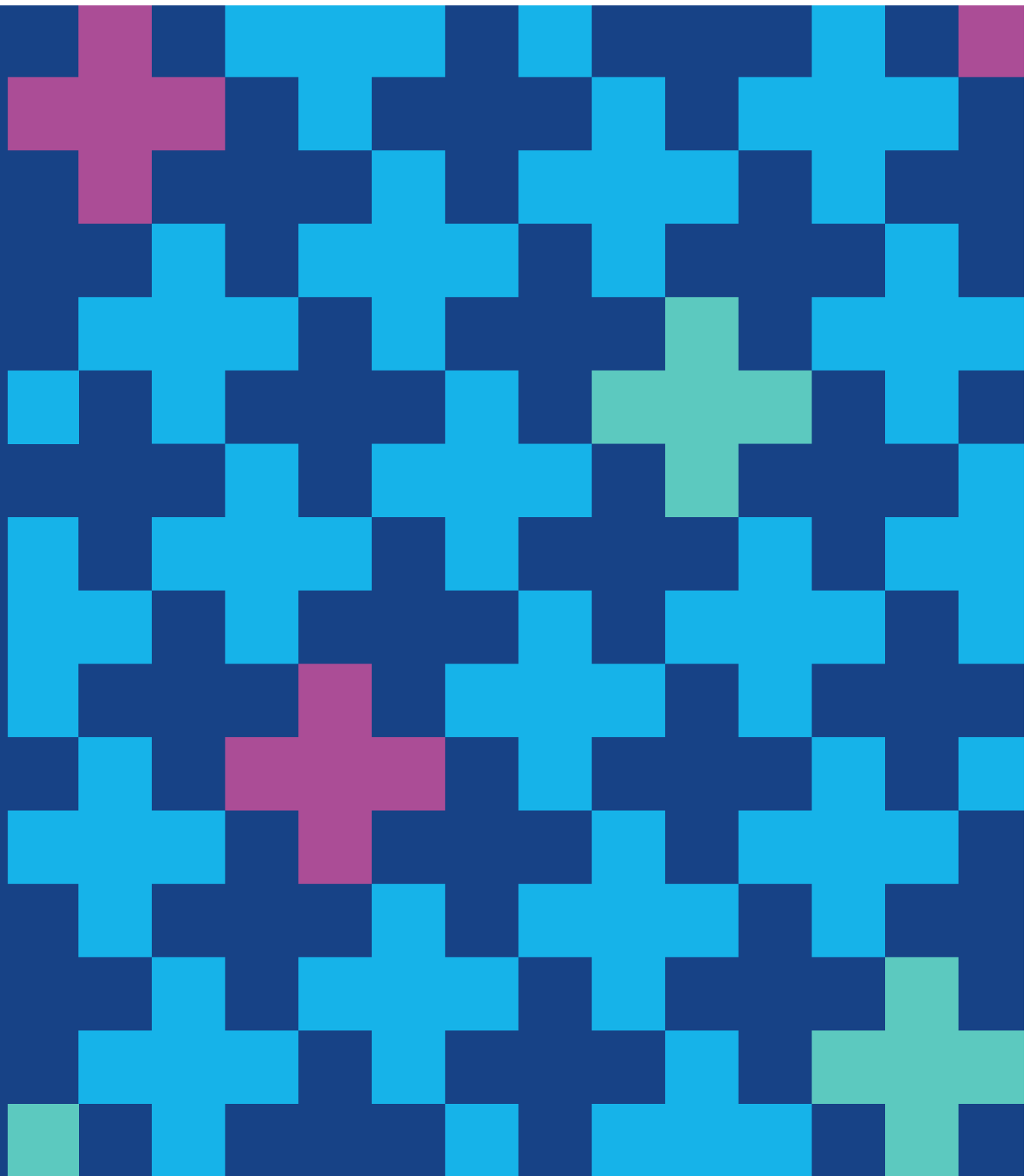


# Unplanned Events and Incidents

Good Practice Guide



## Guide Summary

To provide standardisation and clarity for both Retailers and Wholesalers in relation to unplanned events and incidents.

Event Types

Support Levels

Event Tiers

Message Formats

Methods of Communication

This document has been deemed as a Water Retail Market Guidance or Good Practice Document by the Trading Parties involved in the Retailer Wholesaler Group (RWG). The document is designed to bring together in one simplified guidance/good practice document the different Wholesaler or Retailers Policies or Practices.

It is important to note that wholesaler or retailer policies and practices change from time to time and whilst effort is made to maintain the currency of this document if there is any doubt the current policy or practice should be checked with the relevant wholesaler or retailer.

This good practice guide relates to Part E of the Wholesale Contract Schedule 1, Part 3: Operational Terms.



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**Target audience:** Retailers, including Self-Supply Licensees, and Wholesalers in the Water Market.

### Objective

This document, authored by a sub-group of the Retail Wholesale Group (RWG), aims to provide industry good practice guidance in relation to unplanned events and incidents with a view to encouraging standardisation where possible.

### Introduction

Unplanned events and incidents can impact significantly on the operations of Non-Household customers. They often require prompt delivery of information to customers to protect public health and prevent unnecessary escalation.

Part E of the Wholesale Contract Schedule 1, Part 3: Operational Terms sets out the processes to be followed in relation to changes to Water Services and/or Sewerage Services which are not planned by or on behalf of the Wholesaler, for example Emergencies, potential drinking water quality incidents, pollution incidents and droughts.

Lack of clarity on the roles and responsibilities of Retailers and Wholesalers in relation to this area of the market has resulted in different interpretations and expectations of individual trading parties.

This combined with a lack of consistency in the quality, terminology and delivery mechanisms used in communicating these messages has resulted in this being one of the top five operational issues identified since the market opened.

The document acknowledges the primary role Wholesalers play in coordinating and communicating messages during events and incidents and aims to define and provide guidance on the following subjects:

1. Event Types
2. Events Tiers
3. Methods of Communication
4. Support Levels
5. Message formats

**Note:** Wholesalers should apply the same processes and communicate notifications to all Retailers, regardless of whether they are Self Supply or Third Party Retailers.

#### Appendices:

- A. Drought, Dry Weather Conditions and other circumstances which give rise to Water Shortages.
- B. Link to SEMD / Sensitive Customer definitions
- C. Supply of alternative sources of water during events
- D. CPW10 proactive sharing of emergency contact details during an event

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## 1.0 Event Types

Parts E3 to E7 of the Operational Terms detail the different types of event. The table provides further guidance on the sub-types that fall under each category. It is important that these standard definitions of event type are used during communications (see section 5 Message Formats). The event type is owned by the Wholesaler and should quickly alert the Retailer to the nature of the event.

Code	Type	Sub-type
E3	Change to water or sewerage services	Water quality
		Leak / burst
		No water
		Change in pressure
		Change in sewerage services
E4	Water quality	Water quality
E5	Sewer flooding or pollution	Sewer flooding
		Pollution
E6	Drought	Drought
E7	Emergency	Emergency

NB: Movement between types (or sub-types) is possible, if required by the Wholesaler.

## 2.0 Event Tiers

It is assumed that all Wholesalers will have a tiered approach to incident management that influences what is communicated to customers and Retailers and what is required in terms of support. The types of support Wholesalers may require of Retailers are detailed further in this document (See section 4 Support Levels). For the purposes of this report a three-tier incident management approach has been adopted. Movement between tiers for one event is possible – for example, it can be upgraded if an area affected widens or the nature or impact changes.

The table defines the three tiers of event. The tier of event should again be included in any communications issued to Retailers (see section 5 Message Formats).

Tier	Conditions
Tier 1	<p>Large-scale and/or long duration</p> <p>Significant impact on site specific arrangements and/or sensitive and /or livestock customers</p> <p>Opening of incident room</p> <p>Assistance may be required from the Retailer with regards to communication to the NHH customers, and there is a need to proactively notify the Retailer(s)</p>
Tier 2	<p>Lesser size and/or duration, but still affecting a considerable number of customers in that Wholesaler region</p> <p>Limited or no impact on site specific arrangements and/or sensitive and /or livestock customers</p> <p>Incident room not opened</p> <p>May include event type 'Water quality' where the problem is either discolouration or chlorine</p> <p>Assistance may be required from the Retailer with regards to communication to the NHH customers, and there is a need to proactively notify the Retailer(s)</p>
Tier 3	<p>Lesser size and/or duration, affecting a small number of customers in that Wholesaler region or very short-lived event</p> <p>Limited or no impact on site specific arrangements and/or sensitive and/or livestock customers</p> <p>Incident room not opened</p> <p>No assistance required from Retailers and no need to proactively notify the Retailer as issue is kept under control</p>

### 3.0 Methods of Communication

Wholesalers are required to publish information for the benefit of Retailers and other parties through different media, depending on the tier of the event. Good practice would ensure that these communications are only sent to a Retailer if it has one or more SPIDs that may be affected by any event and that these communications are sent as soon as practically possible. This will allow the Retailer to prepare for any action that may be required. If a Retailer is unaffected then they should expect to be excluded from any targeted communications.

The table details the communication methods to be used in Tier 1, Tier 2 and Tier 3 events.

In summary, a call to the 24-hour Retailer number would only be expected for tier 1 events requiring direct Retailer involvement or for awareness that site specific or sensitive customers are affected.

Retailers will acknowledge receipt of initial notifications of an incident so that Wholesalers are confident the matter is in hand.

Type	Media	Tier 1	Tier 2	Tier 3
General	Web notification (e.g. in named area or postcode region), which should include what NHH customers can do / or to what they may be entitled	Yes	Yes	Yes
	Notifications to registered contacts who have previously signed up to receive alerts (may be NHH or HH or other party) or whose contact details have been proactively shared by the Retailer (see Appendix D)	Yes	Yes	Yes
	Social media messaging	Yes	Yes	No
	Telephony announcement messaging	Yes	Yes	No
Retailer specific	Push notification plus attachment to single Retailer email (see section 5 Message Formats)	Yes	Yes	No - retailer notified retrospectively (within 2 business days)
	Call to a Retailer's 24-hour number with clear call to action (in order of Retailer by sensitivity / SPID density). If not answered a second call 30 minutes later should be made with a voicemail left on both calls.	Yes	No	No

## 4.0 Support Levels

It is accepted that Wholesalers will play the primary role during any event and may not require the support of a Retailer. They will however continue to make any Retailer with customers in the affected area aware and updated.

The table details the level of support that may be called upon if a Wholesaler does require the support of a Retailer and is dependent upon the tier of the event. Such services should only be requested if required.

It should be recognised that Wholesalers retain their duties with regards providing alternative sources of water to specific customer types under the Security and Emergency Measures Directive. In addition, some Retailers will offer alternative supply options to their customers on a commercial basis. Further guidance is offered in Appendix C of this document.

Services	Tier 1	Tier 2	Tier 3
Timely provision of customer contact details for specific postcode areas (may be through Site Specific Arrangement or upon request). As standard these details should include: SPID, Customer banner name and Customer telephone number.	Yes	Yes	No
Provision of a service to pass on messages to customers using information provided by the Wholesaler. Where a specific script is required to be followed this will be provided to Retailers. Method of delivery may vary between Retailers but can include IVR or messages on websites or social media channels (as deemed suitable by the Retailer). On occasions direct telephone contact with certain customers may also be requested and this will be agreed collaboratively between both trading parties. This does not infer the Wholesaler can discharge their responsibilities in this area.	24/7	If required and only during business hours	No
Ongoing incident management support including dedicated contact channels and a shift rota.	Yes	No	No
Feedback to Wholesalers on success rates of delivery of any direct customer communications and any relevant customer comments subsequently received.	24/7	If required and only during business hours	No



## 5.0 Message Formats

The table details the contents of the Incident Alert Notification that should be sent to Retailers at the start of an event or each time there is an update. A file attachment detailing the SPIDs affected should also be provided. Where a Wholesaler is unable to provide Retailer specific messages any file provided should be able to be filtered by the relevant Retailer to display only data pertinent to them and any communal data should exclude customer names.

<b>Subject</b>	a - b - c - d	Where a is the event type (E3-7) And b is the tier of event And c is the count of SPIDs affected for that particular Retailer And d is the unplanned event ID
	<b>Contents</b>	
	Wholesaler name	
	Status	Initial Notification / Update / Complete
	Event Code and sub type	Where the Code is E3-E7
	Support level	Requires clear call to action if needed
	Count of SPIDs affected	For that particular Retailer
	Unplanned event ID	This should be incident specific and where possible include Wholesaler Org ID, geographical location and a date.
	Description of the event	
	Date and time of incident start	
	Action already taken	
	Action planned	Including estimated time of service restoration
	Postcodes affected	To as much granularity as possible, but at least district
	Customer message	Summary of customer message at this stage
	Action for Retailer to take	For "Initial" notification: Retailer to acknowledge receipt. Any specific action to take related to the support level including any script where onward communication is required.
	Information on potable water access location	For 'No water' or 'do not drink' events only

### Incident Alert Notification – Attachment

The adjacent table provides the contents of the attachment sent alongside the Incident Alert Notification.

### Incident Alert – Completion

Email sent using message format table stating “complete”. Reference any outstanding issues, compensation or other actions.

<b>SPID</b>	Water or waste SPIDs affected
<b>Event ID</b>	ID given by Wholesaler
<b>Retailer</b>	If attachment is not Retailer specific
<b>Postcode</b>	Postcode of SPID to unit level
<b>Sensitive Customers</b>	Water or waste SPIDs affected and associated customer names
<b>Site Specific Arrangements</b>	Water or waste SPIDs affected and associated customer names

The details should be provided as an excel file in the following format:

SPID	Event ID	Retailer	Post Code	Sensitive Customer	Site Specific Arrangements
xxxxxxxxxxWxx	Event ID	Org ID	Xxxx xxx	Yes / No	Yes / No
xxxxxxxxxxWxx	Event ID	Org ID	Xxxx xxx	Yes / No	Yes / No
xxxxxxxxxxWxx	Event ID	Org ID	Xxxx xxx	Yes / No	Yes / No
xxxxxxxxxxWxx	Event ID	Org ID	Xxxx xxx	Yes / No	Yes / No
xxxxxxxxxxWxx	Event ID	Org ID	Xxxx xxx	Yes / No	Yes / No

Any further customer information should only be given in accordance with GDPR guidelines.

## 6.0 Summary

In order for effective communication and coordination of unplanned events and incidents a degree of standardisation of terminology and methods of communication is required.

This document has proposed a three-tier approach to events and has assigned roles and responsibilities for each. It has provided guidance on methods of communication, the content of messages and their formats.

It is proposed that this document forms a good practice guide for Wholesalers and Retailers for this area of the market.

## Appendices

### Appendix A: Process E6 – Managing droughts or dry weather

#### Drought, dry weather conditions and other circumstances which give rise to water shortages

The Wholesaler is required to develop and maintain long-term drought plans as described under heading D (Management plans for unplanned events and incidents including flooding) of Part E of the Operational Terms.

Process E6 of the Operational Terms sets out the operational arrangements that the Wholesaler and Retailer shall follow in respect of specific drought or dry weather events whose management is not set out in detail within the Wholesaler's long-term drought plans.

The Wholesaler and Retailer may agree to follow any industry guidance or other code of practice regarding communications, including with Non-Household (NHH) customers, in relation to drought or other dry weather conditions.

#### Wholesaler Responsibilities

1. Whether or not any particular guidance or code of practice is being followed, the Wholesaler shall inform the Retailer:

- When the Wholesaler considers that a drought or dry weather conditions are developing or escalating; and
- When it is giving particular consideration to any restriction on or reduction in Water Services.

2. The Wholesaler shall also confirm to the Retailer:

- The process by which the Wholesaler intends to manage the drought or dry weather conditions, including any lines of communication or planned discussions in relation to a potential restriction or reduction in Water Services; and

- Any reasonable message the Wholesaler wishes the Retailer to convey to its NHH customers.

3. The Wholesaler shall respond to any reasonable question the Retailer may raise and consider any information or representation that the Retailer makes in respect of the Wholesaler's plan to manage the drought or dry weather conditions.

4. If the Wholesaler intends to issue a temporary usage ban under S76 of the Water Industry Act 1991, which may be relevant to the Retailer's NHH customer's activities, or if a Drought Order or Drought Permit is to be sought, then the Wholesaler shall consult with the Retailer.

If the Wholesaler does issue any such ban or obtain any such Order or Permit the Retailer must be kept informed of any change to the terms of the ban, Order or Permit.

5. The Wholesaler shall inform the Retailer whenever it considers drought or dry weather conditions to be subsiding and when any temporary ban, order or permit has been lifted.

#### Retailer Responsibilities

1. Where the Wholesaler provides information or communications relating to the drought or dry weather conditions, the Retailer must follow any reasonable instructions, e.g. asking its NHH Customers to reduce their demand for water.

2. If the Retailer becomes aware of any of its NHH Customers breaching the terms of any temporary ban or drought order, it shall inform the Wholesaler within **one (1)** business day.

## Communications

The Wholesaler must be clear in setting out how the Retailer is to use the information provided.

### Possible Wholesaler – Retailer – Non-Household Customer communications

Communication from Wholesaler to Retailer - for information only	Communication from Wholesaler to Retailer - information for passive use	Communication from Wholesaler to Retailer - information for proactive use
To ensure the Retailer has information at appropriate times in case the dry weather or drought situation deteriorates. The Retailer may wish to start thinking of internal resource requirements should more proactive support be required by Wholesaler.	To ensure the Retailer has appropriate information to hand in readiness for any NHH customer queries – especially required if/ when the Wholesaler issues any general customer/public communications or campaigns – e.g. requests to use water wisely/ conserve water or similar.	To ensure the Retailer has appropriate information and/or communications to proactively publish (e.g. website) and/or push out to its NHH customers (e.g. social media, email). - e.g. where the drought or dry weather conditions are escalating and/or when the Wholesaler is giving consideration to any restriction on, or reduction in, Water Services.

## Appendix A: Sources of Further Information

Please note that this list is not exhaustive but aims to provide some sources that provide helpful information that can be used to build knowledge and understand across Wholesalers and Retailers.

### UKWIR/Water UK – 2014: Managing Through Drought: Code of Practice and Guidance for Water Companies on Water Use Restrictions – 2013 (Incorporating lessons from the 2011-12 drought)

<https://www.water.org.uk/wp-content/uploads/2018/11/managing-through-drought-code-of-practice-min-ilovepdf-compressed.pdf>

### Environment Agency – June 2017: Drought Response: Our Framework for England

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/625006/LIT\\_10104.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/625006/LIT_10104.pdf)

### Agriculture and Horticulture Development Board – Spring 2019: Water Supply Problems? A guide for livestock farms.

<https://ahdb.org.uk/water-supply-problems-a-guide-for-livestock-farms>

### For Welsh customers:

<https://cdn.naturalresources.wales/media/684414/final-wc-drought-plan-guidance-2017.pdf?mode=pad&rnd=131656713580000000>

<https://gov.wales/sites/default/files/publications/2019-06/developing-drought-plans-guidance-for-water-companies.pdf>

In addition, each Wholesaler will publish on their website their company Drought Plan in accordance with Environment Agency and Defra requirements.

## Appendix B: Link to SEMD / Sensitive Customer definitions

[mosl.co.uk/documents-publications/3414-sensitive-customer-definitions](https://mosl.co.uk/documents-publications/3414-sensitive-customer-definitions)

### Definition of sensitive customers for SEMD alternative water supplies

There is a requirement in the Security and Emergency Measures (Water and Sewerage Undertakers) Direction 1998 (SEMD) (as per S208 of the Water Industry Act 1991) for water undertakers to have plans in place to provide additional services in the eventuality of an interruption to potable water supply.

The SEMD directs that certain sets of customers should take priority with the "domestic needs of the sick, the elderly, the disabled, hospitals, Schools and other vulnerable sectors of the population" as primary consideration.

By reviewing existing wholesaler practice the working group proposes that the following categorisation should be adopted:

CAT	Description	Service provision
1	Premises where closure would be logistically impossible: e.g. hospitals and prisons.	Site specific arrangements (SSA) to establish pre-arranged requirements including provision of dedicated tankers on on-site bottled water hubs.
2	Premises where interruption to supply could result in risk to life. e.g. care homes, hospices, nursing homes, sheltered housing.	Less comprehensive version of SSA (SSA lite) to establish service depending on the quantity of water required.
3	Premises where interruption to supply could impact on economy: e.g. education establishments, CNI sites, medical facilities (non-emergency), critical businesses.	Consideration given to establishing SSA / SSA lite. Location of alternative water supplies would depend on local feasibility.
4	Premises where interruption to supply could impact on animal health: e.g. farms with livestock, zoos, vets, kennels etc.	Consideration to be given to use of non-potable water sources for animal welfare.

In the event of a supply interruption alternative water supplies will be provided on a priority basis. First priority must always be vulnerable domestic customers. Any alternative water supply provision will be dependent on the extent of the interruption and other priority requirements.

The direction also sets out that regard need to be paid to the needs of non-domestic users.

In cases where piped water supplies are not available then alternative measures need to be put into place to maintain a minimum level of supply. This is outlined in DWI guidance as "at least 10 litres of water per person per day to all those affected within the first 24 hours of an undertaker becoming aware of an incident" After 5 days the minimum volume supplied rises to 20 litres per person per day.

For NHH customers service provided by wholesaler will be dependent on categorisation of customer type and covered in service agreements and site specific plans. Retail service providers may offer additional support to augment wholesaler provisions.

## Appendix C: Supply of alternative sources of water during events

Across England and Wales there are thousands of kilometres of water supply pipes serving both domestic and non-household customers. Water companies aim to keep their supply networks in operation 365 days a year, 24 hours a day, but it is inevitable that there will be failures in the supply network from time to time with the potential to interrupt customer's water supplies.

Appendix B Link to SEMD / Sensitive Customer definitions - clarifies the types of property that wholesalers will prioritise for the provision of alternative supplies, should a need arise, during an incident which causes an interruption to the mains water supply. It is clear however, that the majority of non-household customers do not fall within these specified categories

This appendix aims to clarify the approach taken by wholesalers with regard to non-sensitive customers during an incident. It also aims to clarify some of the measures that non-sensitive customers can invoke in order to protect themselves during an interruption to their supply.

### Continuity of Supply

Wholesalers cannot guarantee a constant supply of water to any premises, regardless of its sensitivity. This is acknowledged within the industry and wholesalers operate within the guidelines of the GSS standards with regards to what is an acceptable length of time for customers to be 'off supply' (sometimes referred to as 'minutes lost'), until supplies are restored to normal.

In the first instance water companies will rezone supplies in an attempt to minimise disruption and may also pump tankered water into networks to maintain supplies, but this may still mean a short interruption for some customers. Whilst wholesalers will pay GSS compensation if water supplies are not restored in a timely manner, the interruptions, regardless of length can cause process and production issues for some business customers.

## Alternative Supplies

In any incident priority will always be to ensure that alternative supplies of water are made available to domestic customers (including priority groups within the domestic population) and those non-households identified as sensitive in Appendix B. Once companies are happy that these requirements are being met then alternative supplies to other sectors may be considered, but it is important to note that this cannot be guaranteed.

For example small or medium businesses may be encouraged to pick up bottled water from supply stations set up by water companies if required. This may be enough to fulfil domestic needs for a time, but may not be sufficient to continue business operations. In some cases water companies may be able to position bowzers or tankered supplies for the use of business customers - but again this can never be guaranteed and will always be subject to availability at any given time.

## Business Continuity Planning

The statutory levels of compensation available from the GSS scheme may not be sufficient to cover the costs of any lost production should a business need to suspend/restart production. It is therefore important that customers understand the limitations of alternative supplies as set out above and in circumstances where business process rely intrinsically upon a constant supply of water, then it is imperative that customer's business continuity plans take account of this requirement.

Non-household business customers may consider a range of options to ensure business continuity in a situation where supplies are lost. Business continuity solutions may suggest having the use of one or more of the following solutions in place to mitigate any interruptions to supply.

- On site storage (capacity required to operate for a defined number of hours)
- Provision of emergency tankered water supplies (private contractor)
- Borehole supplies
- Wastewater recycling/grey water recovery options

Non-household customer may wish to engage with their Retailers to explore these options further.

In summary it is important to understand the priority that wholesalers will apply to domestic supplies in the first instance and that for some businesses the need to have a comprehensive business continuity plan may be justified in order to minimise the risk of lost production due to even a very short disruption to a mains supply.

## Appendix D: Proactive sharing of customer contact details for use during an event

**This appendix to the guide would like to draw Trading Parties attention to Paragraph C iii) of the Part E of the Wholesale Contract Schedule 1, Part 3: Operational Terms, worded as follows:**

"on a standing basis or as part of general duties of maintaining customer details, provide available Non-Household Customer contact details including, where feasible, telephone numbers and SPIDs, to be used in unplanned events or incidents to the Wholesaler through mutually agreed arrangements. If Trading Parties agree to share Non-Household Customer contact details with the Wholesaler on a standing basis then at minimum these details should include telephone numbers and SPIDs, be updated every three hundred and sixty five (365) days and the Wholesaler must destroy all previously held Non Household Customer contact details provided by the Retailer;"

This approach facilitates Wholesalers in communicating promptly and directly with customers during an event and is referred to in the "Methods of Communication" section of this guide.

It is accepted that this is an optional agreement between trading parties and further information can be found in the guidance section of the MOSL website, document titled "Emergency Contact Details Guidance Document":

<https://www.mosl.co.uk/market-codes/guidance-documents>