

SECTION 7: DRINKING WATER QUALITY COMPLAINTS



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Section 7: Drinking water quality complaints

Summary of Section 7

- ◆ Describes the importance of consumers' complaints about drinking water quality and the need to investigate and solve them promptly.
- ◆ Sets out the procedures that private water suppliers should have in place to investigate the cause of complaints, to determine any remedial action that might be necessary, for liaising with the consumers on the progress with the investigation and for giving consumers advice on the action they can take to minimise any risk to their health.
- ◆ Describes the circumstances when Water Services Authorities (WSAs) must consult and agree with the Health Service Executive (the HSE) on whether there is a potential danger to human health and what WSAs must do if there is such a danger.
- ◆ Sets out when the private water supplier must report complaints to the WSA.

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1. Introduction

1.1 | Private water suppliers will be aware that drinking water quality is very important to consumers. If something has gone wrong with the private water supply it could present a risk to consumers' health or affect the appearance, taste or odour of the supply. Therefore complaints about drinking water quality received from consumers should be investigated promptly by the private water supplier and the results of the investigation given quickly to the complainants. If the cause of the complaint is a problem with the quality of the water supplied by the private supplier, then the private water supplier must take prompt action to remedy the problem. If the cause of the complaint is the condition of the domestic distribution system (the pipe work and fittings) within the premises, the private water supplier must give the complainant advice on how resolve the problem. Complaints may be received from consumers by telephone, in writing by letter, fax or e-mail or in person. Private water suppliers should have in place comprehensive written procedures for dealing with complaints about the quality of private drinking water supplies.

1.2 | It is recommended that all complaints about private water supplies are directed to the private water supplier in the first instance and that the private water supplier should liaise with the complainant to address the cause of the complaint whenever possible. When the WSA receives a complaint about drinking water quality that has not been reported previously to the private water supplier, the WSA will advise the complainant to contact the private water supplier directly and the WSA will also refer the complaint to the private water supplier for investigation. However, where the complaint has already been reported to the private water supplier and the private water supplier does not appear to have dealt with the complaint in a satisfactory matter, the WSA may request the private water supplier to carry out an investigation (or a further investigation) and to report the results to the WSA. The WSA may take enforcement action if it appears necessary.

2. Procedures for dealing with drinking water quality complaints

2.1 | The private water supplier's written procedures for dealing with complaints about the quality of private drinking water supplies should include as a minimum:

- ◆ a system of recording the receipt of telephone, written and personal complaints and for collation those complaints;

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- ◆ a procedure for assigning immediately the management of the investigation of the complaint to an appropriate person (who will co-ordinate the activities of all personnel involved in the complaint). This person should be capable of determining the nature of the problem, determining appropriate investigations to ascertain the cause and assessing whether there could be wider implications;
- ◆ a procedure requiring the assigned person to contact the complainant and explain what the private water supplier is doing and when the complainant can expect a response. This person should keep the complainant informed, particularly if there is any delay;
- ◆ guidance on the investigations that should be carried out which could include as appropriate:
 - reviewing the recent operation of the water treatment works, service reservoir/ water tower and the distribution network to determine whether any action may have contributed to the water quality problem;
 - reviewing the results of recent compliance and operational samples from relevant sampling locations;
 - taking and analysing samples for appropriate parameters from appropriate locations including the complainant's premises. The private water supplier may need assistance from the relevant Water Services Authority (WSA) with the analysis; and
 - analysing any samples taken by the complainant for appropriate parameters, provided the samples are clearly not compromised (the complainant may have taken a sample in a container that obviously contaminated the sample);
- ◆ a procedure for receiving and assessing the results of the investigation and if necessary discussing them with the WSA;
- ◆ a system for the initiation of any necessary action by the private water supplier:
 - taking any appropriate remedial action when the complaint has been caused by the private water supplier's operations; and

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- giving advice to the complainant on the actions he/she should take when the investigation has established that the cause is associated with the condition of his/her pipe work and fittings;
- ◆ a system for reporting the outcome to the complainant as quickly as possible in simple terms (avoid the use of scientific or engineering language that the complainant will not understand);
- ◆ a system for reviewing from time to time the procedures and modifying them if necessary; and
- ◆ a system for reviewing periodically all complaints by number, type and location to determine whether there are particular difficulties with some aspect of the private water supplier's operations.

2.2 | The private water supplier should also have arrangements for checking that the complainant is satisfied with its investigation, explanation of the cause and the action taken. The complainant may not be satisfied and when this occurs the complainant should have the opportunity of the matter being referred to the WSA. The WSA should review the private water supplier's handling of the initial complaint and, if necessary, initiate further investigations. The outcome of the review should be reported to the complainant as quickly as possible.

2.3 | The samples taken as part of the investigation into complaints are not **compliance** samples nor can they be regarded as **operational** samples because they may not be representative of the quality of water normally supplied. However, the private water supplier and the WSA should keep adequate records of these investigative samples and the results of any analysis.

2.4 | Sometimes, particularly when the cause of the complaint is the private water supplier's operations, there may be several complaints of the same nature from consumers in different premises in the supply zone. If there are a sufficient number of serious complaints, the situation may be regarded as an incident, or even an emergency, affecting drinking water quality. In these circumstances the private water supplier should follow the procedures set out in section 8 of this handbook.

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3. Liaison with the Health Service Executive (the HSE)

3.1 | If the investigation of the complaint finds that there has been a non-compliance with a standard in tables A or B or an indicator parameter value in table C of part 1 of the schedule to the Regulations, the private water supplier must notify the WSA of the results. The WSA must consult and agree with the HSE on whether the non-compliance is a potential danger to human health. If the private water supplier (or the WSA) has not detected a non-compliance but is concerned that there may be a health risk (for example because some other substance is present) the WSA should also consult the HSE. If the HSE considers that there is a potential danger to human health, then the WSA (with the HSE's agreement) must require the private water supplier to:

- ◆ prohibit or restrict the use of the supply and take urgent remedial action when the problem is caused by the private water supplier's operations; or
- ◆ provide advice to the complainant about the action he/she can take to minimise the risk to all the consumers in the premises when the problem is caused by the condition of the domestic distribution system (pipe work and fittings) within the premises.

3.2 | Detailed advice on consulting the HSE about the protection of human health and giving advice to consumers and on taking remedial action is given in section 6 of this handbook.

4. Reporting complaints to the WSA

4.1 | If the investigation of the complaint finds that there has been a non-compliance with a standard in tables A or B or an indicator parameter value in table C of part 1 of the schedule to the Regulations, the private water supplier must notify the WSA using the form at Appendix 1 (if the WSA has assisted with analysis of samples taken as part of the investigation of the complaint this form should still be filled in when the private supplier is informed of the result by the WSA). The private water supplier will be required to take remedial action under the provisions of regulation 10 and may be directed to do so by the WSA. Further guidance on the procedures for remedial action programmes is given in section 6 of this handbook.

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Appendix 1: Model form for notification of failure to meet the parametric values in part 1 of the schedule to the Regulations following investigation of a consumer complaint

To Water Service Authority:

Name of WSA contact:

Private water supplier	
Name of water treatment works	
Name of water supply zone (s)	
Water supply zone code(s)	
Estimated population affected	
Parameter (s) affected	
Monitoring results	
Date and location of failure	
Likely cause and duration of the failure	
Has the parameter(s) failed in this supply in the past 12 months (if so give details)?	
Immediate action taken to protect and inform consumers	
Immediate remedial action taken	
Notified by and position	
Date of notification	
Contact telephone number	