

Report on Universal Design

Submission to the CER on 18 December 2015



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1.0 Introduction

This report sets out the background to Universal Design. It then outlines what Irish Water is doing to adhere to Universal Design principles in our customer communications, our website and social media, and how we interact with vulnerable customers.

2.0 Background

The use of plain English and Universal Design are very important to Irish Water when communicating with our customers. We understand the importance of engaging with our customers in an open and transparent manner, so that information can be understood to the fullest extent possible and by as many people as possible.

The Disability Act 2005 established a Centre for Excellence in Universal Design, under the auspices of the National Disability Authority. Universal Design is defined under the 2005 Act and the Centre for Excellence in Universal Design as:

“(a) [...] the design and composition of an environment so that it may be accessed, understood and used —

- (i) to the greatest practicable extent,
- (ii) in the most independent and natural manner possible,
- (iii) in the widest possible range of situations, and
- (iv) without the need for adaptation, modification, assistive devices or specialised solutions,

by persons of any age or size or having any particular physical, sensory, mental health or intellectual ability or disability,

and

(b) means, in relation to electronic systems, any electronics-based process of creating products, services or systems so that they may be used by any person.”¹

Under the Irish Water Customer Handbook² there is a general obligation on Irish Water to “...apply the principles of Universal Design subject to CER approval, when implementing the requirements of and developing the

¹ Section 52 of the Disability Act, 2005. See also <http://universaldesign.ie/What-is-Universal-Design/>
² <https://www.cru.ie/home/customer-care/water/customer-protection-2/>

services referred to in the Codes of Practice, Customer Charters, and Terms and Conditions, and in all associated communications with customers.”³

This general requirement is referred to in section 5 of the Customer Handbook, which states that for domestic customers “Irish Water will ensure that in all communication with customers and in all communication formats plain English is used and the principles of Universal Design will be applied. Irish Water will also ensure that they can provide information in an appropriate manner to those with visual or other impairments.”

Section 12 of the Customer Handbook, dealing with non-domestic customers, has a similar requirement as section 5 above.

The Customer Handbook also requires Irish Water to put in place alternative communication formats for customers who have special requirements not catered for within Universal Design.⁴

Irish Water must supply a report to the CER on how Universal Design has been implemented within customer communication material and processes. The following report is submitted in line with this requirement. Irish Water will outline the work undertaken to promote the use of plain English and to adhere to the principles of Universal Design. We will also provide some background information and context on the use of Universal Design.

³ Requirement 1.1.4 of the Irish Water Customer Handbook

⁴ Requirement 8.5.1 of the Irish Water Customer Handbook

3.0 Irish Water customer communications

The Irish Water communications team follows the principles of Universal Design⁵ where practicable when drafting content for any customer facing communications collateral. These principles are:

- Principle 1: Equitable Use
- Principle 2: Flexibility in Use
- Principle 3: Simple and Intuitive Use
- Principle 4: Perceptible Information
- Principle 5: Tolerance for Error
- Principle 6: Low Physical Effort
- Principle 7: Size and Space for Approach and Use

3.1 Irish Water style guide

In order to adhere to the principles of Universal Design Irish Water has implemented a number of procedures. When drafting customer communications we aim to simplify the language and remove highly technical references so that the communications are accessible by as many people as possible.

At the most basic level we ensure the contrast on all our materials adheres to the accessibility colour wheel. This ensures that there is always a high contrast between the text and the background, this is important for customers with visual impairments. An example of the colour wheel is below.



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⁵ For further information please visit <http://universaldesign.ie/What-is-Universal-Design/The-7-Principles/>

For written communications, we have also established a **style guide** for use by Irish Water marketing and communications staff, whereby certain common terms and phrases are recorded and there is a consistent description. The purpose of the style guide is to ensure all Irish Water communications have a consistent tone and are easy to understand by all. As a large organisation it is important that all our Universal Design requirements are documented in one place. The style guide is a working document and continues to be updated based on feedback from our customers and the National Adult Literacy Agency (NALA).

Customer communications style guide:

We want our communications to be consistent and clear for customers to read. The following points detail key guidelines for communications.

General comments:

- Arial 12 should be used in communications.
- Sentence text is used for all forms, leaflets and documents.
- Don't use upper case text, for example IRISH WATER.
- Write numbers from one to nine in words and use digits for number 10 and upwards (where space is not a consideration, for example on twitter).

Use the principles of Universal Design:

- Use plain English.
- Avoid technical language.
- Keep sentences short; 15 to 20 words in each sentence.
- Break up sentences with full stops, rather than semi-colons.
- Avoid Latin and French expressions such as: e.g., i.e. and etc. - Use the full English equivalents such as: "for example".
- Define unfamiliar abbreviations or acronyms, for example: Water Point Reference Number (WPRN).
- Avoid using BLOCK CAPITALS, *italics* or underlining.
- Avoid splitting words between two lines for example phone numbers
- Use left aligned text – this makes it easier for people to read.

In addition, Irish Water has a number of document templates available for staff across the organisation to use. These templates adhere to the principles of Universal Design and cover minutes/memos/agenda documents, reports, PowerPoint presentations and standard letters. These template documents serve as a training guide for staff members to ensure that the principles of Universal Design are adhered to on a consistent basis throughout the organisation.

3.2 Codes of Practice and Customer Charter

Irish Water has engaged with the NALA in relation to the use of plain English in our domestic customer facing documentation. In 2014 and 2015, NALA assessed all of Irish Water's Domestic Codes of Practice and Customer Charter and suggested amendments. The majority of these amendments were accepted by Irish Water.⁶

Irish Water's updated Domestic Codes of Practice with the NALA amendments were approved by the CER on the 1 October 2015, and are available on the Irish Water website.

3.3 Customer communications: direct mail

Aside from our Codes of Practice and Customer Charter, Irish Water has developed other customer facing documents that adhere to our style guide and are drafted in plain English. For example, our 'Helpful Information' Booklet⁷ and 'Bill Insert'⁸ were drafted to the specifications of Universal Design principles to be customer friendly and to be understood by as many readers as possible. In addition, our metering notification collateral adheres to Universal Design principles.

By using these direct mail communications Irish Water can directly reach our customers in order to provide information about us as a newly formed utility and increase understanding of the essential services we provide.

3.4 Customer communications: TV, press, radio and social media

TV, press, radio and social media are channels used to increase awareness to the public of how Irish Water is improving Ireland's water services.

Our 2015 campaigns reinforced our strategy to drive awareness that Ireland's inadequate water infrastructure needs to be improved.

In 2015 Irish Water ran a number of campaigns:

- Education Campaign (18 March - 1 May)
- Progress Campaign (20 July - 21 September)
- Drain to Sea (17 August - 21 September)
- First Fix Free (4 October - 6 November)

⁶ Changes were not accepted only where the meaning changed

⁷ <http://www.water.ie/docs/helpful-information-booklet.pdf>

⁸ <http://www.water.ie/docs/00509TA-Bill-Insert-May-Eng.pdf>

- Seven Year Business Plan (15 October - 11 December)

It is important to note that within these campaigns we adhered to the Irish Water style guide principals through their creation. For examples of how Irish Water follows Universal Design on its external communications, please see appendices 1 – 6.

Irish Water's values inform everything that we do and are reflected in our external communications. These values are Collaboration, Performance, Customer Service, Safety and Integrity.

When communicating in writing or visually, Irish Water attempts to convey the following messages about our services:

- **Trustworthy** : Competent, sincere, genuine, responsible, clear on commitments, delivers on promises.
- **Forward thinking** : Progressive, open-minded, solution led, aspirational, positive, outward-looking.
- **Authoritative** : Expert, experienced, in control, accountable, concise, clear and factual.

All external communications have incorporated a specific tone of voice through language used which is:

- Straightforward;
- Open and honest;
- Professional;
- Respectful but unapologetic;
- Informative and plain speaking.

When working on external communications it is important to keep a uniform approach. This ensures we adhere to Universal Design and allows us to create a 'brand' for Irish Water that the consumer will resonate with.

Below are examples of how we have implemented a uniform approach:

A) Press: Irish Water ensures that key headlines and taglines are used in all communications.

- Font style using colour of, black, white or blue

Style of imagery, as created by the allocated creative team considers the key Principles of Universal Design

B) Radio: Irish Water ensures that key headlines and taglines are used in all communications. Each advert uses the same voiceover artist,

with a friendly and informative tone and message, which allows trust and familiarity to develop with the Irish public.

C) Online/Social: Irish water ensures that each of our tweets or online adverts features the Irish Water Logo.

- Font style using colour of, black, white or blue.

Style of imagery used in social media communications is in line with the press and online adverts; keeping the messaging the same.

4.0 Vulnerable customers

Irish Water understands that some of our customers will have different needs when it comes to communicating and interacting with us. We will respond to the specific needs of customers who tell us they are 'vulnerable' as outlined in our 'Domestic vulnerable customer Code of Practice'.

A vulnerable customer in relation to water services is someone that is either:

- a) critically dependant on water for their medical needs (Priority services customer), or
- b) someone who for reasons that may include advanced age or physical, sensory, intellectual or mental health reasons requires additional support communicating with, or receiving services from, Irish Water (Special services customer).

Irish Water, the Commission for Energy Regulation and the National Disability Authority have formed a working group to discuss the topic of access to water meter data. Regular meetings are held which considers all relevant solutions that lead to continuous improvements in, and maintenance of, accessible water meter data to Irish Water customers. A further part of the terms of reference is to consider the particular needs of vulnerable customers. In addition, the basic principles of Universal Design are central to the working group's remit.

4.1 Special services customers

Whenever possible, Irish Water will adapt the services provided to suit the needs of customers where specific communication assistance is needed due to vision or hearing impairments. We will try to make sure that any information we make available to the public is also available in alternative formats to suit the needs of all our customers.

- Blind or vision-impaired customers

Irish Water will help customers who are blind or vision impaired to read their bill. We offer Braille bills and talking bills (where one of our advisers will call a customer after receiving the bill and read their bill to them, allowing the customer to ask any questions they may have).

A customer may also choose to use paperless billing. This means they can access their bill details electronically via online account management, which is compatible with assistive technologies.

We also offer key information in audio on CD which we can send to a customer on request. As is discussed in more detail later, there is also a

'BrowseAloud' function on our website so that customers can listen to information within documents available on the website.

- **Deaf or hearing impaired customers**

If a customer is deaf or has a hearing impairment and they have minicom equipment, Irish Water can be contacted by calling **LoCall 1890 378 378**.

We have a dedicated email address at **vulnerablecustomer@water.ie** to respond to all vulnerable customers' concerns.

5.0 Irish Water online content

The Irish Water online team is committed to providing online content that everyone can access regardless of circumstances or ability. Our website⁹ contains several features to help improve the quality of the customer experience. In addition, our social media channels can accommodate a wide range of individual preferences.

5.1 The Irish Water website

The Irish Water website has been built to be as accessible to as many website users as possible. The most important features of our website from a Universal Design perspective are as follows:

- Technical aspects of our website;
- Website visitors with reading or hearing difficulties; and
- Viewing downloadable videos, documents and other content.

5.1.1 Technical aspects of our website:

The water industry, by nature, uses a lot of technical and engineering language. Irish Water tries to use easy to understand language and plain English whenever possible when we communicate with our customers. We apply the principles of Universal Design on our website so that information may be accessed, understood and used to the greatest extent possible by all people.

We have accessibility audits undertaken by external third parties to ensure we are accessible to as many users of our website as possible.

Irish Water will be launching webchat functionality in 2016. The webchat functionality will allow customers to communicate with Irish Water in real time electronically.

5.1.2 Website visitors with reading, sight or hearing difficulties:

The 'BrowseAloud' feature reads web pages 'out loud' for people who find it difficult to read text online. This means that a user can listen to the words on the website as they are read 'out loud' by their computer, or it can simplify and magnify the layout so it is easier to read text. This is useful for people who have reading difficulties, vision impairments or for whom English is a second language. BrowseAloud can also convert selected text into an MP3 digital audio recording format, which can be listened to later. This service is free to everyone.

⁹ <http://www.water.ie>

A customer may also choose to use paperless billing whereby bills can be accessed electronically. This facility is compatible with web-enabled assistive reading technology.

Some documentation on the Irish Water website is available in PDF format to provide for easier reading and printing.

Text size can be adjusted throughout our website. A viewer can also increase or decrease the text size using their browser settings.

The water.ie website is continuously updated to support all modern web browsers across all devices types to make sure that the website is accessible to all.

5.1.3 Viewing videos, documents and other content:

Synced transcripts have been applied to our YouTube video content allowing deaf or hearing impaired viewers, or those who speak other languages, to better understand our content.

Captions are available on personal computers on the Irish Water YouTube Channel as well as on the embedded videos on our website. At present, tablet or smartphone captions are available on the Irish Water YouTube Channel only.

Documents in our resource library can be accessed in a number of different formats, including audio, large text and video.

5.2 Social media

Our social media channels accommodate a wide range of individual preferences as well as abilities and provide choice in method of use. These social media channels are included on www.water.ie as an alternative contact source. Our social media channels state clearly their purpose, times they are attended and other information where appropriate. This information is included in the “bio” or “about” section of each.

Where it improves the communication of a message we will include an image which can include complimentary information to further understanding of the message.

We post service and supply notifications and updates on Twitter which can be seen by users who view our Timeline or in the Twitter feed of a user who follows our Twitter account.

Twitter aligns with international web accessibility guidelines.

6.0 Conclusion

This report sets out how Irish Water incorporates the principles of Universal Design into its communications with customers. This has been implemented through our marketing collateral, our website, and in our communications with vulnerable customers.

Some of the key changes we have implemented are:

- Marketing – company-wide style guide which must be followed in all of our communications;
- Irish Water’s Website – “BrowseAloud” functionality for blind or vision impaired customers;
- Vulnerable Customer communications – Braille bills, talking bills and other communications.

Irish Water will continue to apply the principles of Universal Design in 2016 as we engage further with our customers.

7.0 Appendix 1

Customer Charter and Codes of Practice

Universal Design Principles 1- 7 were encompassed in these booklets. Examples below:

Domestic Customer Charter

PHOTOGRAPH

1st December 2015

Introduction

Irish Water is responsible for providing and managing public water and wastewater services on a national basis. We are committed to providing the highest standard of Water Services, by protecting, maintaining and improving Ireland's water and wastewater services.

This Customer Charter outlines the standard of services you should expect to receive when dealing with us. We also have a Code of Practice for vulnerable customers, communications, complaint handling, metering and network operations. You can request a copy by calling us on **LoCall 1890 448 448** or **+353 1 707 2824** or you can visit **www.water.ie**

References in this Customer Charter to Water Services include the public water and wastewater services that we provide.

Our Guaranteed Service Standards

In addition to our overall service standards, we have guaranteed service standards.

If we fail to meet any of these commitments, you will be entitled to a payment of €10. Please contact us by using the methods listed under the "How to contact us" section below.

We will credit this €10 to your account within 15 working days (and you will be able to see it on your next bill). If you would like us to pay you in a different way, we will send payment to you within 15 working days.

If you have questions about your account or water services we are ready to help. When you contact us it would help if you have your account number to hand. To protect your account, we can only discuss account information with the account holder or nominated person.

Web: www.water.ie
Twitter: @IWCare

Irish Water
PO Box 860
South City Delivery Office
Cork City

Billing and general queries

8am-8pm Mon-Fri, and 9am-5.30pm Sat
Telephone: **LoCall 1890 448 448** or **+353 1 707 2824**
Minicom: **LoCall 1890 378 378**
(for hearing impaired customers with their own minicom equipment)

Water supply queries and emergencies

24 hours a day, 7 days a week
Telephone: **LoCall 1890 278 278** or **+353 1 707 2828**
Minicom: **LoCall 1890 378 378**
(for hearing impaired customers with their own minicom equipment)

Please note that the rates charged for 1890 (LoCall) numbers may vary across different service providers. Calls made using mobiles may be more expensive. This publication is available in Braille, on CD and in large text format on request by calling 1890 448 448.

Safeguarding your water for your future.

1. Customer complaints

Irish Water guarantees to respond to customer complaints within five working days with a resolution or a plan for the steps required to achieve a resolution, under normal conditions.

If we fail in this guaranteed standard you will be entitled to a payment of €10.

2. Bills

Irish Water guarantees that we will issue accurate bills to domestic customers every three months in accordance with the Water Charges Plan. There may be exceptions to this for the first and final bills.

Metered customers' bills will be capped at the relevant unmetered charge and unmetered customers' bills will be based on the relevant unmetered charge, in accordance with the Water Charges Plan.

If we fail in this guaranteed standard you will be entitled to a payment of €10.

3. Water meter installation

Before a water meter is installed at a property, Irish Water guarantees to provide at least two weeks' notification as well as meter installation information.

If we fail in this guaranteed standard you will be entitled to a payment of €10.

4. Damage to property

Irish Water will remedy any damage to a property which has occurred during meter installation, solely and directly as a result of Irish Water's employees/agents' activities and/or negligence. This will be done free of charge to the customer.

If we fail in this guaranteed standard you will be entitled to a payment of €10.

5. Customers in payment difficulties

Irish Water commits to treating sympathetically customers who contact us when they are having difficulty paying their water bills or who proactively contact to discuss payment arrangements.



Metering Code of Practice



1st October 2015

Introduction

Irish Water is responsible for providing and managing public water and wastewater services on a national basis.

As part of our long-term approach to managing Ireland's water resources, we continue to introduce water meters to homes around the country. Domestic meter installation will enable customers who are metered to keep track of how much water they use and allow us to improve our network management.

This Code of Practice is to inform and protect customers who are having, or have a water meter installed in their home.

We also have a Code of Practice for vulnerable customers, billing, complaint handling, communications and network operations. You can request a copy by calling us on LoCall 1890 448 448 or +353 1 707 2824 or you can visit www.water.ie

References within this Code of Practice to Water Services include the public water and wastewater services that we provide.

What is a water meter?

A water meter (meter and radio unit attached to the meter) is a device that measures the amount of water supplied to your property. We do not charge you for fitting the water meter.

The index reading on the water meter shall be taken at face value as evidence of the quantity of water supplied to a customer (see below regarding meter testing). We may record index readings on the water meter using either manual or automatic meter reading methodologies.

If you have questions about your account or water services we are ready to help. When you contact us it would help if you have your account number to hand. To protect your account, we can only discuss account information with the account holder or nominated person.

Web: www.water.ie
Twitter: @WCare

Irish Water
PO Box 860
South City Delivery Office
Cork City

Billing and general queries

8am-6pm Mon-Fri, and 9am-6.30pm Sat
Telephone: LoCall 1890 448 448 or +353 1 707 2824
Minicom: LoCall 1890 378 378
(for hearing impaired customers with their own minicom equipment)

Water supply queries and emergencies

24 hours a day, 7 days a week
Telephone: LoCall 1890 278 278 or +353 1 707 2828
Minicom: LoCall 1890 378 378
(for hearing impaired customers with their own minicom equipment)

Please note that the rates charged for 1890 (LoCall) numbers may vary across different service providers. Calls made using mobiles may be more expensive. This publication is available in Braille, on CD and in large text format on request by calling 1890 448 448.

Safeguarding your water for your future.

Not every home will have a meter. For technical or other reasons, it will not always be possible to install a meter at a customer's property. Where it is not possible, we will explain to you the reasons for not installing a meter.

The meter box and its contents, including the meter and radio unit, remain the property of Irish Water at all times.

Location and access to the water meter

Irish Water seeks to install water meters in accessible locations, where feasible, and seeks to ensure that the meter can be read by the customer.

Typically, we will put the meter in an underground meter box in the footpath or verge outside your property. In most cases, we will endeavour to install the meter on publicly accessible land. However, the meter may also be located on private land and/or inside a building.

You may open the meter box to read the meter or to isolate the water supply at the stop valve. If you need us to, we will facilitate access to the meter, as required.

Meter installation

During our meter installation programme, we will give customers two weeks notice before we start work in the area. We will also give you relevant background information on metering.

We will issue another notice at least two days' before the actual installation of the meter at your property.

We will install water meters in a professional way causing as little disruption as possible to you, the property and the surrounding area.

Appendix 2:

'Education campaign'

Universal Design Principles 1- 7 were encompassed in this campaign.

Radio advertisement script:

"In Ireland, there is approximately 60,000 kilometres of public water supply pipe.

That's enough to take you to Australia and back...twice.

Find out more about our programme of upgrades and repairs at water.ie

Irish Water. Safeguarding your water for your future."

Press advertisement: Note in press advertisements a combination of black and white text is used according to the contrast with the blue background.



Digital advertisement:



Appendix 3: 'Progress Campaign'

Universal Design Principles 1- 7 were encompassed in this campaign.

Radio advertisement script:

“At Irish Water, we’re making Ireland’s beaches cleaner.
We’re working on new wastewater treatment facilities in Cork, Dublin,
Galway and Waterford which will improve water quality and make
beaches cleaner in these areas.
We’re committed to making sure everyone can enjoy Ireland’s
beautiful beaches.
For more information visit water.ie
Irish Water. Safeguarding your water for your future.”

Press advertisement: Note in press advertisements a combination of black and white text is used according to the contrast with the blue background.



Appendix 4: 'Progress Campaign'

Universal Design Principles 1- 7 were encompassed in this campaign.

Radio advertisement script:

"At Irish Water, we're upgrading Louth's water mains supply. We're currently installing over thirteen kilometres of modern pipes to connect Omeath to the Cooley regional supply, bringing better water services to the people of Omeath. We're committed to provide everyone with clean, reliable drinking water. For more information visit water.ie Irish Water. Safeguarding your water for your future."

Press advertisement: Note in press advertisements a combination of black and white text is used according to the contrast with the blue background.



Appendix 5: 'Drain to Sea Campaign'

Universal Design Principles 1- 7 were encompassed in this campaign.

Social Media:



Appendix 6: 'First Fix Free Campaign'

Universal Design Principles 1- 7 were encompassed in this campaign.

Radio advertisement script:

"Millions of litres of water are currently being lost because of leaks on domestic properties. We're helping Irish Water customers fix leaks on their property with our First Fix Free scheme.

We've already fixed over 1,000 leaks for free and we're now saving 18 million litres of water every day.

If you discover a leak on your property or would like more information on the First Fix Free scheme and its terms and conditions, visit water.ie or lo-call 1890 278 278.

Irish Water. Safeguarding your water for your future."

Press advertisement: Note in press advertisements a combination of black and white text is used according to the contrast with the blue background.



Social Media :



Appendix 7: 'Seven Year Plan Campaign'

Universal Design Principles 1- 7 were encompassed in this campaign.

Radio advertisement script:

"Ireland's tap water isn't as clean or as pure as we'd like. At present, 900,000 people face some risk of contamination.

But we're doing something about it.

We're upgrading 121 of Ireland's water treatment plants.

Of course that's a huge job, but we are working on it.

In time, everyone's tap water will be as clean and pure as possible.

It's all part of our seven year plan.

Irish Water. Safeguarding your water for your future."

Press advertisement: Note in press advertisements a combination of black and white text is used according to the contrast with the blue background.



Radio advertisement script:

"Right now, untreated sewage flows into our rivers and seas at 44 different locations.

We're going to make sure all wastewater is treated before it gets discharged.

Treating Our Wastewater.

It's all part of our seven year plan.

To learn more about our future plans visit"

Press advertisement:

