



# Position Paper

## **ANEC comments on CEN Horizontal European Services Standardisation Strategy (CHESSS)**

**June 2010**

**ANEC-SERV-2010-G-024final**

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## 1. Introduction

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In 2007-08 the National Standards Bodies of the United Kingdom (BSI), Spain (AENOR), Germany (DIN), the Netherlands (NEN), Estonia (EVS), and Denmark (DS) carried out a feasibility study on generic service standardisation in Europe, entitled CEN Horizontal European Service Standardisation Strategy ('CHESSS'). The project was carried out within the framework of Second Programming Mandate M/371 addressed to CEN by the European Commission, and was structured around seven separate modules:

*Module 1 – Guidance in the preparation of service standards*

*Module 2 – Glossary of terms and definitions relevant to service standardisation*

*Module 3 – Safety in the delivery of services*

*Modules 4 and 5 – The customer satisfaction continuum: customer satisfaction assessment, responding to complaints, redress provision and dispute resolution*

*Module 6 – Billing and metering*

*Module 7 – The specification, sourcing, delivery and quality of business-to-business services*

The underlying project concept was that there are fundamental principles of good service, delivery and assessment which are applicable to any service regardless of the sector in question.

Following the work which finished in July 2008, the final reports of these modules, as well as a consolidated CHESSS report, were published in May 2009.

## 2. Development of a generic European service standard

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The consolidated CHESSS report states that customers should be able to easily and reliably recognise quality in service provision and, based on the findings of the individual module reports, the report suggests that a commercially viable and effective way to do this would be to introduce a generic service standard, capable of supporting claims of conformity which could be objectively verified.

The report bases the conclusion on several justifications, including the following: there is a horizontal dimension to services (Module 1), there is a need for transparency with regard to risks and safety (Module 3), a generic

standard could help service providers meet their legislative obligations, and both providers and customers identified the value of including complaint procedures in the wider context of a service provision standard (Modules 4 and 5).

The report also refers to the high interest in the generic ISO standards on customer satisfaction<sup>1</sup> as evidence of the feasibility and benefits of a generic approach.

The study suggests that such a standard should include specifications on service design (e.g. a strategy for customer centricity, a risk assessment), information provision to customers (e.g. description of service, terms and conditions, applicable industry codes, billing and payment issues, dispute resolution availability, accessibility of information, safety risks), on compliance with ISO billing standards and with European complaints and redress standards (to be developed), as well as periodic risk assessments, reviews of compliance requirements and customer feedback plans.

The report notes that such a generic standard could be "*used in its own right or as a support tool for sector-specific standardisation activities*"<sup>2</sup>.

#### *Certification based on a horizontal service standard*

The report recommends that the proposed horizontal European service standard should be developed in a way that permits certification and 1<sup>st</sup>, 2<sup>nd</sup> and 3<sup>rd</sup> party assessments. Regrettably little further analysis or justification on this point is given, apart from the reference to World Café<sup>3</sup> findings showing that quality marks and 3<sup>rd</sup> party assessments contribute to consumers feeling safe. The CHESSE report<sup>4</sup> underlines that "*to avoid customer confusion about the type of assessment process undertaken by the service provider, the format and content of declarations should be strictly governed through a clause in the generic service standard*", outlining how providers should communicate the type of option they have used.

The report goes on to recommend that the Commission and CEN should work together to determine whether a services quality mark should be introduced alongside the generic service standard.

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<sup>1</sup> ISO 10001 – 10004 series on customer satisfaction

<sup>2</sup> CHESSE consolidated report, pg. 21

<sup>3</sup> During October and November 2007 the CHESSE project held four workshops in London, Tallinn, Copenhagen and Madrid to engage with stakeholders. These were termed 'World Cafés'.

<sup>4</sup> Consolidated CHESSE report, pg. 22

### ANEC considerations

ANEC supports the CHESSS finding that certain broad core elements are common to all quality service provision, including elements such as qualified and trained staff, and clear, complete and correct information provision<sup>5</sup>. A generic standard could indeed help avoid inconsistencies in the approaches taken in vertical service standards and filling gaps left by such vertical standards.

On the other hand, considering that service sectors differ greatly in nature, and with them e.g. the depth, breadth and format of information given to consumers, finding a balanced approach to suit all service types and sectors may result in a standard containing only very general clauses. The CHESSS report also acknowledges this risk in mentioning that a generic standard could potentially favour some service providers over others.

With this in mind, ANEC believes generic service standardisation is an issue which merits further examination. However, should a decision to develop a generic service standard be taken, we believe the standard should be a support tool for the development of sector-specific standards. There are however diverging views among consumer representatives in Europe on whether such a generic standard, if developed, should be used for certification.

A final consideration to be noted here is the relationship between the suggested generic service standard and the suggested new guidance document on service standards (see below, point 3), or even the existing ISO/IEC Guide 76 on service standard development<sup>6</sup>. Although the addressees of the last two documents would be different (the proposed guidance document is meant to provide assistance in the preparation of service standards and is thus mainly aimed at standards writers, whereas the proposed generic standard would be in the form of a specification, to be used by service providers), ANEC strongly recommended to CEN to merge the two documents into a CEN/ISO Guide to preparing service standards in order to prevent considerable overlap between the documents<sup>7</sup>.

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<sup>5</sup> See also ANEC position on service standardisation, 2007

<sup>6</sup> ISO/IEC Guide 76 'Development of service standards - Recommendations for addressing consumer issues'

<sup>7</sup> See also ANEC comments on the draft AENOR Guide to preparing service standards – version N5, (ANEC-SERV-2010-G-021), May 2010

### **3. Guidance in the development of service standards (Module 1)**

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The study carried out under CHESST Module 1 concluded that there was a horizontal dimension to services, and that there was evidence of demand for more guidance on how a service standard should be prepared. The report thus proposes the development of a new guidance document on the preparation of service standards. A draft of such a document was prepared as part of the CHESST study, and has since been further discussed under the umbrella of CEN/BT WG 163 'Service standardisation'.

The module also proposed the development of a list of service standards and other deliverables which would be accessible to standards writers as a reference. It is proposed that this list be annexed to the new guidance document.

#### ANEC views

Considering that a systematic approach to service standardisation is a relatively new concept, ANEC recognises the value in having guidance for the developers of service standards. We believe such guidance should be so designed as to support all those interested in, or involved with, developing standards in the area of services, whether public or private sector, business to business, or business to consumer. In our view, the guide should be short and simple in order to ensure the document is actually used by standards developers and relevant stakeholders. It should give a methodology for developing generic or sector-specific standards in the field of services, taking into account the needs and requirements of all stakeholders, including consumers. It should, as far as possible, provide practical solutions and answers on how to address clauses in service standards rather than providing mere questions or checklists.

However, as discussed in CEN/BT WG 163, in order to avoid overlaps with the already existing ISO/IEC Guide 76 and to avoid a situation where two very similar guides are available, ANEC believes the proposed new guidance document and ISO/IEC Guide 76 should be considered together in order to form one guidance document covering all services (business-to-business and business-to-consumer). This document should be adopted at both CEN and ISO level to ensure consistency of approach.

ANEC also supports the proposal to establish a regularly updated list of service standards and other relevant deliverables. We believe this list should be publicly available and easily accessible for all stakeholders, not just standards developers.

#### **4. Safety in the delivery of services (Module 3)**

Module 3 of the CHESSS project focused on three safety/security aspects (life and health of consumers, financial security, and data security) and on three service areas (tourism and leisure, health care, and passenger transport).

##### *Need for a horizontal European legislation on service safety*

ANEC fully supports the study recommendation on the need to establish a horizontal European legislative framework covering the *safety* of services, with technical details to be specified in formal standards. ANEC also supports the recommendation that close cooperation of EU policy-makers with standards bodies should be ensured.

In clarification to what is mentioned in the report, ANEC stresses that it does not believe the New Approach, in its current form, should be extended to services. Instead, we support the use of the regulatory model found in the field of eco-design of energy-using products (EuP), which allows for more transparency and identified stakeholder involvement<sup>8</sup>.

##### *Development of a horizontal European service safety standard*

ANEC welcomes the conclusion that there is insufficient support for the development of a single horizontal service *safety* standard covering all service aspects and all services.

ANEC's position was misrepresented in the report<sup>9</sup> in that ANEC does not consider the development of a horizontal service safety standard to be

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<sup>8</sup> In contrast to the New Approach, the EuP framework directive provides that implementing measures, to be prepared by regulatory committees, should specify the detailed requirements for various energy-using product groups. Thus, standards complement this system by setting the technical specifications and test measures. An important part of this EuP approach is the setting up of a consultative stakeholder forum, which allows stakeholders to provide their contribution on the implementation of the Directive. In ANEC's view a similar approach should be adopted in the services field.

<sup>9</sup> Consolidated report from Module 3 'Safety in the delivery of services', Annex C, pg. 10 wrongly reports that 'ANEC calls for a horizontal safety standard specified by sector specific standards'.

practical or desirable, and therefore agrees with the views expressed by other stakeholders and experts, including industry and academia, according to whom the service sector is too broad to find sufficiently detailed, common service safety elements for all service areas.

Similarly, ANEC welcomes the finding that there is no need for a horizontal European service safety standard on financial security and data security, and considers that such areas are better addressed by regulation.

#### *Inclusion of safety aspects in proposed generic service standard*

The Module 3 report recommends that the single European service standard, proposed in the main CHESSE report (see above, point 2), should also address the following safety related requirements: information provision (on risks, service, equipment, premises), risk assessment and terminology. The report goes on to clarify that "*specific risk assessment tools, systems or methods should not be included in this standard*", but that it should build on the existing, different approaches and compile them into one document.

Although ANEC fully supports the finding that information provision constitutes one of the most important elements in ensuring service safety, we draw attention to the ANEC views on a possible generic service standard, outlined in point 2, above.

#### *Development of a guideline on implementation of Directives*

Although ANEC acknowledges the benefits of having guidance on the implementation of existing safety-related European Directives, we consider that the responsibility for the development of such guidelines should be for the European Commission, rather than for (private) Standards Bodies. The development of such guidelines would require significant in-depth knowledge of the legislation in question as well as the existing regulatory practices in each Member State.

Also, the report appears to recommend the development of one guideline covering all existing directives impacting on service safety. However, considering the variety of legislation referred to in the report (e.g. Data Protection, Package Travel), it is questionable whether one guideline could adequately cover the various instruments or whether a separate guideline would be needed for each legislative instrument.



### Information on relation between regulations and standards

Considering the strong link between service standards and legislation, confirmed by this and other studies<sup>10</sup>, ANEC supports the finding that more information on the relation between regulation and standards should be provided. The report recommends that such information should be made part of the Guidance document on the preparation of service standards proposed under Module 1 (see under point 3). When developing this Guide, ANEC believes that attention should be drawn to the important link between legislation and standards, in order to ensure better understanding of the differences and roles of the two.

## **5. Customer satisfaction and complaints & redress (Modules 4 and 5)**

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### General remark

ANEC regrets that, apart from the contribution made during the World Café event (2007) and the final CHESSE seminar in Brussels (2008), ANEC was not in a position to contribute to these modules as the questionnaire was aimed at organisations/companies which are themselves using customer satisfaction/complaints handling procedures, rather than societal stakeholders such as consumer organisations.

### Development of guide on how to achieve customer centricity and customer guidance

The study recommends that a CEN subgroup to the group developing the generic service standard (see above, point 2) is set up to develop a guidance document on achieving 'customer centricity'. According to the report, this should cover the issues of how best to acquire information from customers as to their needs and expectations and as to their service experience and satisfaction, as well as provide information and guidance on the importance of customer interface, on engaging employees (redirection, reorientation and training of customer-facing staff), and on selecting and implementing/managing customer interface systems.

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<sup>10</sup> See also e.g. ANEC study 'Service standards: defining the core consumer elements and their minimum requirements', <http://www.anec.eu/attachments/ANEC-R&T-2006-SERV-004final.pdf>

Considering that customers play an integral part in the quality of service delivery, in that also they must respond to requests for information from the provider (and not merely vice versa), the study goes on to recommend that the above project is carried out in parallel with CEN engaging with service providers and consumer representative bodies to make advice available to customers on how to derive maximum benefit from a given service. Such customer guidance could be included as an annex in the customer centricity guide with a recommendation that service providers make it available to customers. Alternatively, the report mentions that it could be made available in conjunction with the proposed web-based services glossary<sup>11</sup>. In either case, the report recommends it is made available free of charge.

ANEC supports any serious initiatives which put the consumer at the heart of service provision with the aim to improve service quality and increase transparency in the real consumer interests (not simply those of the service provider). However, considering the number of guidance documents already in existence, and the number of new ones proposed to be developed by the CHESSS report, ANEC is sceptical of the added value of such a customer centricity guide. Moreover, although we agree with the notion of customers forming an integral part in (most) service delivery, we are not convinced that further generic guidance could offer a real benefit to consumers, considering that each service situation is different and consumers' questions and expectations are likely to be service specific. If prepared, care should be taken to ensure that it does not duplicate information existing in the guides already discussed.

#### *European specifications for complaints handling and redress provision*

The CHESSS report draws attention to the fact that consumers have to deal with numerous service providers on a daily basis, each with their own complaints and feedback procedures, and must therefore familiarise themselves with a new complaints system each time, which can prove frustrating. The study notes further that, in the case of cross-border service provision entailing differences in language and culture, having an unfamiliar system for complaints handling may discourage consumers from buying such services or seeking redress where necessary.

The report therefore recommends that CEN, through CEN BT/WG 163 'Service standardisation', initiates a project to deliver a coordinated set of European specifications for complaints handling and redress provision. According to the report, these should be capable of being directly applied by

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<sup>11</sup> Module 2 – Glossary of terms and definitions relevant to service standardisation

providers and bodies seeking to provide dispute resolution facilities, and should also be capable of application for benchmarking purposes by service providers. The report suggests they ought to be based on the guidance provided in ISO 10002<sup>12</sup> and ISO 10003<sup>13</sup>, and should contain requirements relating to: availability and transparency, accessibility, confidentiality, cost, objectivity, responsiveness and timeliness. The report goes on to state that any system should be accessible for all (including to those acting as agents for e.g. vulnerable consumers), and should be proactive in developing links with consumer advice agencies.

The report also notes that the existence of the European Consumer Centre Network (ECC-Net) could offer a suitable route to the introduction of a European approach to complaints handling and redress based on a set of standard procedures.

Although ANEC strongly supports the establishment of common core principles on complaints, redress and dispute systems, we want to avoid any unnecessary duplication of work. Following from this, ANEC considers that the most appropriate approach would be to strengthen the existing ISO series of standards on customer satisfaction to specification level, to be then adopted also at the European level.

Further to the above, we express our agreement with the findings of the study in that any complaints and redress/dispute systems should be easily accessible for all, that responses and decisions should be provided in a timely, fair and transparent manner, and that information on consumer advice agencies should be increased.

#### *Development of a European Standard on ADR<sup>14</sup>*

The report acknowledges that there is room for improvement in ADR schemes but, in view of the uncertainty surrounding the feasibility of producing a pan-European procedure, the report recommends that CEN, through CEN BT/WG 163 'Service standardisation', should first initiate a CEN Workshop Agreement (CWA) setting out the requirements for ADR. Such a Workshop Agreement should take into account the CWA on Online Dispute Resolution (ODR) and ISO 10003<sup>15</sup>.

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<sup>12</sup> ISO 10002:2004 Quality management - Customer satisfaction - Guidelines for complaints handling in organizations

<sup>13</sup> ISO 10003:2007 Quality management - Customer satisfaction - Guidelines for dispute resolution external to organizations

<sup>14</sup> Alternative Dispute Resolution (ADR) is taken to include mediation, conciliation, assisted negotiation, and arbitration

<sup>15</sup> See footnote 13

ANEC is not convinced of the reasoning offered in the report as to why a CEN Workshop Agreement is proposed considering that the International Standard, ISO 10003, already exists. Although the report correctly states that the International Standard is not designed for claims of compliance by companies, ANEC believes it more appropriate to revise the ISO standard into a specification, to be adopted in Europe, than to develop an entirely new document at the European level. Moreover, we note that the CWA on ODR takes into account the ISO standard and would not need to be reconsidered in the ISO standard.

ANEC also draws attention to some existing European regulation in this field, such as the European Directive 2008/52/EC on mediation in civil and commercial matters, as well as two European Recommendations (98/257/EC and 2001/310/EC) on ADR.

#### European Customer Satisfaction Index benchmark standard

The study highlights the need to provide customers with the means to make an informed judgment between competing services, whether at the national or European level, and suggests that a pan-European Customer Satisfaction Index (CSI), or a coordinated network of national CSIs, could be the answer to avoid the proliferation of competing CSIs<sup>16</sup>. The report recommends the development of a European Standard setting *"the salient requirements and defining principles of CSIs ("establishing key criteria for customer satisfaction assessment and the principles and methodology for its operation") in a manner appropriate for the provision of a CSI, and against which existing and future CSIs could be compared"*. This would, according to the report, be of assistance to customers, but would also facilitate companies in making the decision on whether or not to offer a service in a particular country.

The report underlines that although it has been suggested that due to cultural differences it would be difficult to determine a single attribute hierarchy across countries, *"there is reason to believe that the attributes themselves would translate from country to country even if their preferred ranking may differ"*.

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<sup>16</sup> In this context, a CSI is meant to cover both the national CSIs, as well as any indices created by companies/consumer organisations, etc.

### ANEC views

ANEC wants to see better evidence in support of this statement before taking a definitive opinion. Although transparency and accuracy in the comparability of service quality are aims shared by ANEC, the subject of customer satisfaction is a highly complex one. The accuracy of the measurements often depend on variables such as the service sector, whether the service is free for the consumer or not<sup>17</sup>, etc. Moreover, a recent study<sup>18</sup> reinforced our position that there are fundamental differences between the consumer and business perspectives and approaches which ought to be carefully addressed. Moreover, customer satisfaction measurements have limits which often lead to false considerations and judgement.

ANEC therefore considers that developing a European generic CSI would be difficult and would not necessarily have any added value for consumers. We call for a more in-depth study of customer satisfaction measurements and assessment taking into account the divergence between the consumer and business approaches.

Should a CSI methodology be developed in the future, we believe it should include minimum requirements for the development of CSIs and allow for the development of sector-specific CSIs with additional indicators to complement the generic one. A sector-specific approach (such as hotel rating systems) may indeed be preferable as it would allow identifying both objective and subjective criteria which are specific to each sector.

### Cooperation with ECC-Net

ANEC supports the report recommendation that CEN should seek to establish liaison with the ECC-Net to ensure their participation in the above work.

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<sup>17</sup> Consumers often rank services based on price but if the consumer does not pay for the service, then he/she is more likely to consider quality objectively.

<sup>18</sup> IFAV study commissioned by the Austrian Standard Institute – Consumer Council “Customer satisfaction - from the viewpoint of the consumers”, November 2009

## **6. Billing and metering (Module 6)**

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### *General remark*

Apart from the contributions made during the World Café event (2007) and the final CHESSS seminar in Brussels (2008), ANEC regrets not being consulted on this module.

### *Billing*

The report concludes that, although the development of a CEN Standard on a uniform billing format<sup>19</sup> would be technically possible and beneficial in encouraging cross-border service delivery and use, there is not sufficient stakeholder support for such a standard in the short term. Furthermore, the report refers to the work of ISO/PC 239 'Network services billing' and recommends that CEN liaison with this work be established with a view to possible European adoption of the ISO standard.

ANEC supports the report's finding that work on a European Standard on uniform billing format should not be started at this time. In order to ensure coherence and avoid overlaps, we also welcome the recommendation for the CEN/CENELEC Sector Forum on Energy Management to seek liaison with the relevant ISO Committee.

As a development that has taken place since finalisation of the report, ANEC draws attention to the work carried out on energy billing in a DG SANCO Working Group related to the Citizen's Energy Forum<sup>20</sup>.

### *Metering*

The report notes a lack of clarity regarding the benefits of (smart) metering, although e.g. their potential for informing and influencing user behaviour patterns has been largely acknowledged. The report also states that basic research as to which information should be given in order for it to be effective in changing behaviour is still required. As trials on this are still underway in Member States, the report recommends waiting for such results before proceeding with work.

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<sup>19</sup> Covering mainly gas, electricity, water, telephone, cable services

<sup>20</sup> See for example, BEUC paper "How should a bill look like? Information from BEUC's members", March 2009

The report does, however, recommend that CEN should seek to liaise with CENELEC on developing a shared strategy on standardisation of smart house services and enabling technologies, and that to facilitate this, a stakeholder meeting on interoperability should be organised to initiate a CEN Workshop Agreement on an interoperability framework for smart house services and technologies, and to establish a programme for future standardisation in the field.

ANEC notes the many developments in the field of smart metering since the completion of the CHESSS report, many of which are in line with the recommendations found in the report. Notably we draw attention to the Commission Mandate M/441 'Standardisation in the field of measuring instruments for the development of an open architecture for utility meters involving communication protocols enabling interoperability' and the European Standards Organisations' Smart Meters Coordination Group set up in relation to this.

End.

## APPENDIX – About ANEC

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### About ANEC

*ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment as well as related legislation and public policies. ANEC was established in 1995 as an international non-profit association under Belgian law and represents consumer organisations from 31 European countries. ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels*

### Contact person at the ANEC Secretariat

Laura Degallaix

More information about ANEC and its activities is available at [www.anec.eu](http://www.anec.eu)

Should you have any problems in accessing the documentation, please contact the ANEC Secretariat.

☎ +32/2-743 24 70

📠 +32/2-706 54 30

✉ [anec@anec.eu](mailto:anec@anec.eu)

📍 Avenue de Tervueren 32, box 27 – BE-1040 Brussels, Belgium

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