



# Complaints Handling Policy – Connected Energy

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## INTRODUCTION

### PURPOSE

This policy is intended to ensure that we handle complaints fairly, efficiently, and effectively.

Our complaint management system is intended to:

- enable us to respond to issues raised by customers making complaints in a timely and cost-effective way.
- boost customer confidence in our processes.
- provide information that can be used by us to deliver quality improvements in our products, services, staff, and complaint handling.

This policy provides guidance to our staff and people who wish to make a complaint on the key principles and concepts of our complaint management system.

### SCOPE

This policy applies to all staff receiving or managing complaints from customers regarding our products and services.

## COMMITMENT

This company expects staff at all levels to be committed to fair, effective and efficient complaint handling.

The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented:

Who	Commitment	How
General Manager	Promote a culture that values complaints and their effective resolution.	<ul style="list-style-type: none"> <li>• Report publicly on complaint handling.</li> <li>• Provide adequate support and direction to key staff responsible for handling complaints.</li> <li>• Regularly review reports about complaint trends and issues arising from complaints.</li> <li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li> <li>• Encourage staff to make recommendations for system improvements.</li> <li>• Recognize and reward good complaint handling by staff.</li> <li>• Support recommendations for product, service, staff, and complaint handling improvements arising from the analysis of complaint data.</li> </ul>
Manager responsible for complaint handling	Establish and manage our complaint management system.	<ul style="list-style-type: none"> <li>• Provide regular reports to the GM on issues arising from complaint handling work.</li> <li>• Ensure recommendations arising out of complaint data analysis are canvassed with the GM and implemented where appropriate.</li> <li>• Recruit, train, and empower staff to resolve complaints promptly and in accordance with policies and procedures.</li> <li>• Encourage staff managing complaints to provide suggestions on ways to improve the organization's complaint management system.</li> <li>• Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly.</li> <li>• Recognize and reward good complaint handling by staff.</li> </ul>

Who	Commitment	How
<p>Staff whose duties include complaint handling</p>	<p>Demonstrate exemplary complaint handling practices.</p>	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Assist people to make a complaint, if needed.</li> <li>• Comply with this policy and its associated procedures.</li> <li>• Keep informed about best practice in complaint handling.</li> <li>• Provide feedback to management on issues arising from complaints.</li> <li>• Provide suggestions to management on ways to improve the organization's complaints management system.</li> <li>• Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.</li> </ul>
<p>All staff</p>	<p>Understand and comply with our complaint handling practices</p>	<ul style="list-style-type: none"> <li>• Treat all people with respect, including people who make complaints.</li> <li>• Be aware of the complaint handling policies and procedures.</li> <li>• Assist people who wish to make complaints to access the complaints process.</li> <li>• Be alert to complaints and assist staff handling complaints resolve matters promptly.</li> <li>• Provide feedback to management on issues arising from complaints.</li> <li>• Implement changes arising from individual complaints and from the analysis and evaluation of complaint data as directed by management.</li> </ul>

## POLICY FRAMEWORK GUIDING COMPLAINTS HANDLING POLICY

Complaints must be handled in line with, and guided by, our policies and procedures, including but not limited to:

- Legal Compliance Policy
- Payment Assistance and Financial Hardship Policy
- Family Violence Policy
- Corporate Governance Plan

## TERMS AND DEFINITIONS

Term	Description
Complaint	Expression of dissatisfaction made to or about us, our products, services, staff, or the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.
Complaint management system	All policies, procedures, practices, staff, hardware, and software used by us in the management of complaints.
EOWA	Energy & Water Ombudsman WA
Policy	A statement of instruction that sets out how we should fulfill our vision, mission, and goals.
Procedure	A statement or instruction that sets out how our policies will be implemented and by whom

## GUIDING PRINCIPLES



## FACILITATE COMPLAINTS

### PEOPLE FOCUS

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products, and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame. People making complaints will be:

- provided with information about our complaint handling process.
- provided with multiple and accessible ways to make complaints.
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate.
- provided with reasons for our decision/s and any options for redress or review.

### NO DETRIMENT TO PEOPLE MAKING COMPLAINTS

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

### ANONYMOUS COMPLAINTS

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

## ACCESSIBILITY

Information about how to make a complaint must be easily accessible for a customer, including information on our complaints handling policy.

We will also provide customers with information on their right to contact the Energy & Water Ombudsman WA at any time for independent advice and information, as well as to complain to the Ombudsman if they are dissatisfied with our handling of their complaint or dispute. The Ombudsman's contact details are on our website.

## NO CHARGE

Complaining to us is free.

## RESPONSE TO COMPLAINTS

### FIRST POINT OF CONTACT RESOLUTION

Where possible, complaints will be resolved at first contact.

### RESPONSIVENESS

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible of the following:

#### **1. Complaints process**

- expected time frames for our actions.
- progress of the complaint and reasons for any delay.
- their likely involvement in the process.
- possible or likely outcome of their complaint.



## **2. Objectivity and fairness**

- Complaints will be addressed with integrity and in an equitable, objective and unbiased manner.
- We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.
- Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

## **3. Responding flexibly**

- Our staff are empowered to resolve complaints promptly and with as little formality as possible. They will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.
- They will also assess each complaint on its merits and involve people making complaints and/or their representative in the process as far as possible.

## **4. Confidentiality**

- We will protect the identity of people making complaints where this is practical and appropriate. Personal information that identifies individuals will only be disclosed or used by us as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.
- Manage the parties to a complaint.
- Complaints involving multiple organisations.
- Where a complaint involves multiple organisations, we will work with the other organisation/s, where possible, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.
- Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.
- Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.
- Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers.

- Complaints involving multiple parties.
- When similar complaints are made by related parties we will try to arrange to communicate with a single representative of the group.

## EMPOWERMENT OF STAFF

All staff managing complaints are empowered implement our complaint management system as relevant to their role and responsibilities.

Staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system as appropriate.

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints.

At the same time our success depends on:

- our ability to do our work and perform our functions in the most effective and efficient way possible.
- the health, safety, and security of our staff.
- our ability to allocate our resources fairly across all the complaints we receive.
- When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

If you feel we have been unable to resolve a complaint you have made satisfactorily, you may wish to contact the Energy and Water Ombudsman on 1800 754 004.

## COMPLAINT MANAGEMENT SYSTEM

### First call resolution



### Escalated call resolution



## INTRODUCTION

When responding to complaints, staff should act in accordance with this complaint handling process as well as any other internal documents providing guidance on the management of complaints.

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

The five key stages in our complaint management system are set out below.

### 1. Receipt of complaints

- We will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.
- The record of the complaint will document:
  - the contact information of the person making a complaint.
  - issues raised by the person making a complaint and the outcome/s they want.
  - any other relevant information.
  - any additional support the person making a complaint requires.

### 2. Acknowledgement of complaints

- Receipt of each complaint will be acknowledged promptly and preferably within 5 working days.

- Consideration will be given to the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.
3. Initial assessment and addressing of complaints.
- Initial assessment
    - After acknowledging receipt of the complaint, we will confirm whether the issue/s raised in the complaint is/are within our control.
    - We will also consider the outcome/s sought by the person making a complaint and, where there is more than one issue raised, determine whether each issue needs to be separately addressed.
    - When determining how a complaint will be managed, the following is considered:
      - How serious, complicated, or urgent the complaint is.
      - Whether the complaint raises concerns about people's health and safety.
      - How the person making the complaint is being affected.
      - The risks involved if resolution of the complaint is delayed.
      - Whether a resolution requires the involvement of other organisations.
4. Addressing complaints
- After assessing the complaint, consideration will be given on how to manage it, which may include the following:
    - Give the person making a complaint information or an explanation.
    - Gather information from the product, person, or area that the complaint is about.
    - Investigate the claims made in the complaint.
  - The person making the complaint will be kept up to date on progress, particularly if there are any delays. Communication on the outcome of the complaint will be done using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.
  - Providing reasons for decisions
    - Following consideration of the complaint and any investigation into the issues raised, the person making the complaint will be contacted and advised of:
      - the outcome of the complaint and any action we took.
      - the reason/s for our decision.

- the remedy or resolution/s that we have proposed or put in place.
  - any options for review that may be available to the complainant, such as an internal review, or external review to the independent EOWA.
5. Closing the complaint, record keeping, redress and review
- Comprehensive records will be kept about:
    - how the complaint was managed
    - the outcome/s of the complaint including whether it or any aspect of it was substantiated, and recommendations made to address problems identified and any decisions made on those recommendations.
    - any outstanding actions that need to be followed up.
    - Outcomes will be properly implemented, monitored, and reported to the complaint handling manager and/or senior management.

## ALTERNATIVE AVENUES FOR DEALING WITH COMPLAINTS

People who make complaints shall be informed about any internal or external review options available to them, including EOWA.

## ACCOUNTABILITY AND LEARNING

### ANALYSIS AND EVALUATION OF COMPLAINTS

Complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports will be run on:

- the number of complaints received.
- the outcome of complaints, including matters resolved at the frontline.
- issues arising from complaints.
- systemic issues identified.

- the number of requests we receive for internal and/or external review of our complaint handling.

Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements. Both reports and their analysis will be provided to the senior management for review.

## MONITORING OF THE COMPLAINT MANAGEMENT SYSTEM

The complaint management system will be monitored to:

- ensure its effectiveness in responding to and resolving complaints.
- identify and correct deficiencies in the operation of the system.

Monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

## CONTINUOUS IMPROVEMENT

We are committed to improving the effectiveness and efficiency of its complaint management system.

To this end, we will:

- support the making and appropriate resolution of complaints.
- implement best practices in complaint handling.
- recognise and reward exemplary complaint handling by staff.
- regularly review the complaints management system and complaint data.
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

Hamish Moffat :

Signature:

Date:

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