

# Complaints

---

## Good Practice Guide

Lissa Balmer

5/30/2024



Version 1.5

*“To provide standardisation and guidance for Retailers, Wholesalers, Customers and Third Parties on the process for complaints*”

## Contents

Complaints.....	0
1. Objectives .....	2
2. Guide Principles .....	2
3. Responsibilities .....	3
3.1 Retailer Responsibility.....	3
3.2 Wholesaler Responsibility.....	3
3.3 Mixed Responsibility .....	3
4. Complaint Escalations .....	3
5. Customers in Financial Difficulty .....	4
6. Memorandum of Understanding (MoU).....	4
Appendices .....	6
Appendix 1 Links to Operational Terms .....	6
WRC Part 3 Operational Terms - (clean).....	6

*To provide standardization and guidance for Retailers, Wholesalers, Customers and Third-Party Organisations on the process for complaints*

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

## 1. Objectives

- To provide an industry good practice guide.
- To encourage a consistent and collaborative market approach which ultimately has the customer at the heart of what it seeks to achieve.
- Reduce market complexity for Retailers, Non-Household Customers (Customers), their representatives and third-party intermediaries (TPIs).
- Provide clear guidance for all parties on what good practice is when it comes to complaints.
- Ensure the right routes are followed to get to a positive customer outcome.
- It's recommended this guide is used alongside the Memorandum of Understanding (MoU)
- Wherever possible suggested timings have been placed within the guide but as an industry we should be striving to complete activities sooner to ensure a better customer experience.

## 2. Guide Principles

- 2.1 When considering a customer complaint it's essential that all relevant information is shared no matter whether the customer complaint is wholesale, retail or mixed  
Using the Bi-Lateral Processes in the Hub there are potentially now three routes that can be taken for a complaint:  
F4 – A Customer Enquiry which is specific to a SPID and is customer impacting. When responding to an F4 we'd encourage a substantive response is best practice (see point 2.5 below)  
F5 - There's a clear expression of customer satisfaction that the retailer needs to raise with a wholesaler (The complaint form)  
F7 – The new form – This should be used as a General Enquiry form and should not replace the F4. Examples of when this form could be used are a meter read removal or a customer query which is NOT a complaint.
- 2.2 This guide has been put together by the RWG Complaints Group with a view of sharing common good practice to ensure that the experience is as smooth as possible for all of the parties involved
- 2.3 Trading parties must have a clearly defined escalation process in the event that a retailer is not satisfied with the support or response received.
- 2.4 It's generally recommended as good practice to have a two stage internal complaints process
- 2.5 A substantive response must be provided to a customer within ten (10) working days. For a response to be substantive it must include the following:
- Steps taken to investigate the complaint and the appropriate actions or outcomes
  - What happens next with the complaint
  - A date by when (if applicable) the customer will be contacted again with an update
  - How the complaint is proposed to be resolved
  - If a complaint is a stage two, advice should be given as to where to go should the customer remain unhappy e.g. CCW and or ADR services depending upon the retailer's complaints policy.

- 2.6 Although this is a Good Practice Guide for Complaints it should not be used in isolation, there are other good practice guides and processes across the industry which may support the customer issue as well.

## **3. Responsibilities**

### **3.1 Retailer Responsibility**

- 3.1.1 The complaints process should be owned by the retailer as per the market codes
- 3.1.2 The Retailer should always ensure the Customer is aware of timeframes and timelines where appropriate and manage expectations.
- 3.1.3 The Retailer at all times must act in the best possible way to support the Customer using clear and simple language
- 3.1.4 If the Wholesaler asks for additional information to support the customer complaint the retailer will ensure that this is gained in a timely manner.
- 3.1.5 If a referral is made from CCW it would be best practice for a retailer to share the referral recommendations with the wholesaler to ensure there is no confusion
- 3.1.6 If a Retailer believes the outcome provided by the wholesaler is inappropriate, they must challenge this on behalf of their customer
- 3.1.7 It is the retailer's responsibility to close down the Complaint (F5) form in the Bilateral Hub. The F5 form does not automatically close.

### **3.2 Wholesaler Responsibility**

- 3.2.1 Will review the information provided by the Retailer and ensure that any additional requests are shared back to the Retailer as soon as possible.
- 3.2.2 Commit to the timelines as dictated in the codes, aspiring to respond to retailers within five (5) working days to allow the Retailer to respond to the customer within ten (10) working days
- 3.2.3 If a complaint is completely an operational issue the Wholesaler can choose to deal with it directly but must inform the Retailer within a maximum of 1 business day to allow the appropriate forms to be raised in line with market codes.
- 3.2.4 A customer can raise a complaint via a wholesaler if it is for a retailer complaint it can be submitted via the MOSL hub and the above SLA applies too
- 3.2.5 If a wholesaler receives a complaint directly from a customer they can trigger a Wholesale F5 form within the bilateral hub.

### **3.3 Mixed Responsibility**

- 3.3.1 If a customer has a mixed responsibility complaint the Retailer must share all relevant information regarding the customer issue and as soon as possible
- 3.3.2 If appropriate, retailers and wholesalers should be willing to engage in tri-partite conversations to seek appropriate resolutions within a timely manner.

## **4. Complaint Escalations**

- 4.1 There are some times when a complaint cannot be resolved without an external view and if for example an escalation point is featured within a Retailer's complaints policy it's crucial that all relevant information is shared

- Ensure if questions are raised by CCW these are shared with all relevant parties (see point 3.1.5)
  - Ensure as standard, if a stage one complaint resolution has been offered what this was
  - Include any further details/information shared by the customer as to what their preferred outcome would be
- 4.2 CCW will on occasion make direct contact with a wholesaler to seek appropriate resolution on a complaint
- 4.3 Where a customer is needing support from an Alternative Dispute Resolution (ADR) provider, please ensure that if a wholesaler has been named in the complaint they're allowed to review the complaint before it goes to the ADR service provider. Also ensure a timeline for response is shared. Please be aware however, an ADR provider whilst they may offer suggested activities for wholesaler follow up, can only really be involved in retail activities on a complaint and this should be made very clear to the customer to avoid confusion.
- 4.4 If as per a Retailer's Complaints Policy they've cited CCW and then Alternative Dispute Resolution Provider (ADR), the customer must take this case to the nominated ADR provider within 6 months of the closure letter provided by CCW. It is also recommended a copy of the CCW closure letter is made available for the purposes of ADR.

## 5. Customers in Financial Difficulty

- 5.1 When initially penned, this section was written to provide additional support and guidance when working with Covid affected businesses, however it's clear in the aftermath of COVID there are clear economic constraints and financial difficulties being felt by a number of customers. This section seeks to provide some guidance for support for these such customers.
- 5.2 It's recommended when dealing with non-household customers a retailer encourages them to be as honest and open about their situation.
- 5.3 Retailers should seek to deal with the customer with respect and trying where possible to support the customer, an option here is to provide extended payment plans in order to ensure that payments are manageable for the customer
- 5.4 When a customer enters into a payment arrangement or plan it is expected that this will pause or halt an escalation to a debt recovery path
- 5.5 It's important to note, retailers are not qualified to provide financial advice and as such should seek to signpost customers to appropriate services, for example Business Debt Line. <https://www.businessdebtline.org/>
- 5.6 Wherever possible appropriate payment plans should take into account historic debt and current consumption and should be reviewed with customers ideally on a six monthly basis as a minimum in collaboration with the customer.

## 6. Memorandum of Understanding (MoU)

- 6.1 This document should be used in conjunction with the memorandum of understanding and it's recommended that all parties are committed to the MoU
- 6.2 A copy of the MoU and the committed parties is also to be read in conjunction with this document



## Appendices

### Appendix 1 Links to Operational Terms

Please see links below to

WRC Part 3 Operational Terms - (clean)

<https://www.mosl.co.uk/download-document/b2987f9c0152c0be3b6f456bfe6ae4a7>

<b>Date</b>	<b>Amendments Made</b>	
30/05/24	<ul style="list-style-type: none"><li data-bbox="504 230 863 264">• Inclusion of F4, F5 and F7</li><li data-bbox="504 264 986 324">• Request for F4 to be responded to with Substantive Response</li></ul>	