



COMPLAINTS MANAGEMENT POLICY

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REVIEW AND AMENDMENT HISTORY

Date	Summary of changes
15/04/2016	Policy review, update of complaint management and reporting, added dispute definition, updated for M2 Energy.

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COMPLAINTS MANAGEMENT POLICY

1. DOCUMENT APPROVAL

This Policy ("Policy") is sponsored and approved by M2 Energy's Chief Operations Officer.

2. APPLICATION OF THIS POLICY

This Policy has been created to apply to all brands and services provided by M2 Energy Pty Ltd. This is the Commander Power & Gas version of the M2 Energy Complaint Management Policy.

3. DEFINITIONS

Name	Description
Commander or CPG	Means M2 Energy
Complainant	Means a Person, organisation or its representative who makes a complaint about M2 Energy.
Complaint	Means any grievance or expression of dissatisfaction made to M2 Energy by a Customer or member of the public, about any product, service or activity of M2 Energy.
Critical Procedure	Means a procedure based on regulation or industry code that, if not complied with, carries possible penalties or other significant risk to M2 Energy.
Customer	Means an organisation or person that receives a M2 Energy product.
Customer Satisfaction	Means a Customer's perception of the degree to which the Customer's requirements have been fulfilled.
Customer Service	Is an interaction of the organisation with the Customer throughout the life cycle of a product.
Dispute	Means any complaint that is escalated either internally or externally. This included ombudsman complaints, referrals to other dispute resolution schemes such as the Victorian Administrative Appeals Tribunal or other State based consumer dispute resolution scheme.
Feedback	Means an information or compliment about an action, Policy , process, or outcome related to M2 Energy activities or opinions, comments and expressions of interest in the products or the complaints-handling process
First Call Resolution	Means a complaint can only be considered as resolved on 1st call if the Customer has agreed to the resolution offered by the 1st contact agent and no escalation has taken place, or is organised to take place
Interested Party	Means a person or group having an interest in the performance or success of M2 Energy.
M2 Energy (M2E)	Means M2 Energy Pty Ltd (ABN 15 0123 155 840)
Non-Critical Procedure	Means a procedure that is not based on regulation or industry code or carry significant risk. Typically, this would follow best practices.
Objective	Means something sought, or aimed for, related to complaints handling.
Open Complaint	Means a complaint case that is open, as opposed to being pended or resolved. It may or may not have been assigned
Ombudsman	Is an independent complaint and dispute resolution party. Energy Retailers must be a member of an independent dispute resolution scheme, and M2 Energy is a member of the Energy Ombudsman Schemes in all relevant jurisdictions.
Policy	Means this Policy, and details the overall intentions and direction of M2 Energy related to complaints handling.
Process	Means a set of interrelated or interacting activities which transforms inputs into outputs.
Resolved Complaint	Means a complaint is considered resolved or closed after M2 Energy has advised a resolution to the Customer which has been accepted and any actions required on M2 Energy's part have been completed. A complaint can also be closed if M2 Energy has proposed all feasible possibilities to resolve the complaint and it has been escalated to the appropriate level, however the Customer has not accepted the resolution.
Social media	Means an online social networks used to disseminate information through online social interaction

4. COMPLAINT MANAGEMENT POLICY

4.1. Purpose

This Policy is intended to ensure that M2 Energy handles complaints fairly, efficiently and effectively.

M2 Energy's complaint management system is intended to:

- enable M2 Energy to respond to issues raised by people making complaints in a timely and cost-effective way;
- boost public confidence in our complaints and Disputes processes; and
- provide information that can be used by M2 Energy to deliver quality improvements to M2 Energy's products, services, staff and complaint handling processes.

This Policy provides guidance on the key principles and concepts of our complaint management system to M2 Energy's staff and management, M2 energy's Customers and other relevant parties who wish to make or escalate a complaint.

4.2. Introduction

Complaints, compliments, and Feedback from Customers allow us to improve upon the services we provide. It is of the utmost importance that Customer complaints are resolved quickly and in an efficient and caring manner. This reduces the Complainants level of concern and could potentially turn the complaint into a positive experience for the Customer.

Most Customers do not take the time to complain to their service provider about the problems they encounter. So it is important that we make the process as easy as possible and resolve Complaints quickly, and to the Customer's satisfaction.

M2 Energy understands that Customers who have experienced problems are likely to discuss them with family and friends which could potentially damage M2 Energy's reputation.

This Policy has been established to create a framework so that Customers can easily make a complaint. All complaints must be recorded and then analysed, which helps us to develop a better understanding of our Customers' needs. This also helps us learn from our mistakes and improve our Customer service.

We must provide clear and concise information to Customers regarding our Policy including how they can submit a complaint. This Policy also outlines our internal and external escalation points should a Customer remain unhappy with our resolution, including their rights to refer their complaint to their relevant Ombudsman service, at no cost.

4.3. Scope

This Policy encompasses M2 Energy's approach to:

- Complaints, Disputes and Feedback about M2 Energy products, services, policies, processes, people or actions.
- The principles for dealing with Complainants and Interested Parties;
- Responsibilities associated with handling, resolving, escalating and reporting complaints within M2 Energy; and
- Establishing and maintaining a standard national approach to complaint handling and management.

4.4. Business rules

The following is a summary of general business rules associated with this Policy:

- All complaints, involving safety or health issues must be addressed immediately;
- All written complaints must be acknowledged within 5 working days;
- All complaints must be assessed and actioned objectively and on individual merit;
- The complaint process must be easy, accessible and responsive to Customers, including those with disabilities and language difficulties;
- Complaints must be managed in accordance with M2 Energy's Privacy Policy ;
- All Customers must be advised of their right to escalate their complaint to the Ombudsman if they are not satisfied with M2 Energy's response;

4.5. Objectives

The primary objective of this Policy is to provide management, employees, and Customers with guidance on complaint handling and management within M2 Energy.

This Policy also aims to:

- Establish an effective, efficient and accessible complaints handling and management system;
- Ensure that Customers can provide Feedback and make complaints quickly, easily and with confidence;
- Ensure M2 Energy staff address complaints in a prompt, courteous, and efficient manner;
- Ensure that all complaints are handled appropriately, and in accordance with the appropriate standards and legislative requirements;
- Ensure M2 Energy handles complaints effectively and avoids escalation of Complaints and Disputes;
- Attempt to resolve complaints in a manner that is acceptable to all parties;
- Establish and maintain a high level of Customer satisfaction with M2 Energy products and services;
- Ensure that M2 Energy meets its regulatory and legislative requirements for complaint handling;
- Provide a conducive environment for the operation of an effective complaints handling process, that achieves timely, fair and reasonable outcomes for Customers;
- Provide a flexible approach to complaint handling, that is continuously reviewed and improved;
- Improve M2 Energy's products and services through effective complaint analysis and process improvement.

4.6. Our guiding principles

The guiding principles to M2 Energy's complaint management processes are:

- to understand that everybody has a right to complain or dispute a decision that has been made;
- to provide easy access to responsive complaint and Feedback processes for all Customers, including those with those with disabilities and language difficulties;
- to clarify if Feedback or general concern is intended to be a complaint or dispute;
- to welcome, acknowledge and record Customer complaints and Feedback and handle them responsively, with courtesy and respect;
- to treat all information about a complaint or complainant with confidentiality, and in accordance with the M2 Energy's Privacy Policy ;
- to enable Customers to authorise advocates and representatives to assist them with their complaint;
- to attempt to record and resolve complaints at first contact and, if necessary escalate them to a responsible specialist, supervisor or manager;
- to provide all reasonable assistance to the Customer when their complaint requires escalation;
- to prioritise complaints in accordance with their urgency, with complaints about health and safety issues (gas leaks, power interruptions etc.) dealt with immediately;
- to acknowledge all written complaints within 5 working days,
- to suspend collection activity and payment of disputed amounts, while a complaint is being investigated;
- to provide complaint handling and resolution processes free of charge;
- to assess and action complaints objectively on individual merit, in an open minded and unbiased manner, seeking to resolve complaints using effective processes
- to ensure that Customers understand their right to escalate their complaint to the appropriate Ombudsman if they are not satisfied with M2 Energy's response;
- to provide effective escalation processes for unresolved or more complex Customer complaints;
- to provide a Customer with Feedback about the progress of their complaint, and the estimated time to resolve their complaint. We will also advise them if we will not be able to meet our original time frame;
- to prevent complaints escalating into Disputes by developing effective processes to resolve complaints quickly and effectively;
- to provide written responses to Customers, where requested;
- to follow through on any agreements made with the Customer;
- to provide training to enable staff to achieve these principles;
- to appoint a person to drive the Policy and take ultimate responsibility for ensuring compliance and effective management of complaints;
- to provide systems to enable the recording, tracking, reporting and analysis of Customer Feedback and complaints;
- to continuously improve our Customer service and complaints processes.

4.7. Multiple party complaints

Where multiple parties are involved in a complaint or dispute M2 Energy will review the options that may be available for co-ordination of communication to the parties, subject to appropriate privacy and confidentiality requirements. Where multiple internal departments or teams are involved in a complaint, one department will be selected to manage the combined response.

5. AWARENESS AND ACCESS TO COMPLAINT MECHANISMS

This Policy enables Customers to provide feedback, express their dissatisfaction or make a complaint to M2 Energy in an easy and convenient manner. It enables and encourages staff to resolve Complaints and Disputes quickly and in a mutually satisfactory manner, and ensures Customers can escalate unresolved complaints internally or to their relevant Ombudsman if necessary.

M2 Energy accepts Customer complaints over the phone, in writing, via email or fax. Customers with disabilities and language difficulties are also able to access to our complaint handling processes to provide any Feedback, or make a Complaint.

M2 Energy has adopted the "tell us about it" statement as an easy to understand summary of our complaints Policy that is available online, and included in relevant Customer communications (see Appendix 1).

Our "Tell us about it" Policy is available on our website and outlines how to make a complaint to M2 Energy and what a Customer can do if they are unhappy with our response. Information on how a Customer can obtain an independent review of our response through the appropriate Ombudsman is also provided.

Our training and awareness programs ensure that all personnel are aware of this Policy and their role in it. Refresher training is carried out to ensure staff awareness of Complaints Handling Processes.

Information about this Policy and Complaint handling processes are available via the following Customer communication channels:

- Commander Website – "Tell Us About It" statement;
- Commander Bills and Notices;
- Commander Energy Market Terms and Conditions;
- Commander Standing Terms and Conditions;

6. CUSTOMER COMPLAINT AND FEEDBACK PROCESS

- Customers making a complaint or providing Feedback about M2 Energy's products or services, have their complaint or Feedback recorded in M2 Energy's complaint recording systems which are different for each brand.
- Commander Power & Gas's complaint case management system is part of our Orion Customer Information System 'Orion' and enables users to record, classify, and track complaints through to their resolution.

All complaints are recorded, and if they cannot be resolved immediately, will be escalated to the appropriate M2 Energy team to resolve and advise the Customer.

M2 Energy will use its best endeavours to acknowledge to Customers within 5 working days of the receipt of their complaint (where not made via telephone, and acknowledged immediately).

While every endeavour is made to resolve and close a complaint at first contact, if escalation is required the complaint is kept open through escalation until the Customer accepts resolution. This prevents duplication of effort, ambiguity, and helps accurate reporting of complaint volumes.

7. COMPLAINT TRACKING, REPORTING AND ANALYSIS

Tracking, reporting and analysis of Customer complaints is a fundamental requirement for the continued improvement of M2 Energy’s general Customer service processes and policies, as well as the ongoing review of this Policy .

M2 Energy will ensure that complaints are recorded and tracked in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular monthly reports will be run on:

- the number and category of complaints received;
- the number and category of Disputes received
- the status of complaints, including matters resolved at first contact; and
- issues arising from complaints and Disputes;

Regular analysis of these reports will be undertaken to monitor trends, to identify systemic issues, and to measure the quality of our Customer service and make improvements.

These reports will also be used to meet jurisdictional regulatory reporting requirement as required.

On a regular basis summary reports, their analysis and action plans to address issues identified will be provided to M2 Energy’s Chief Operating Officer and Senior Management for review.

8. OMBUDSMAN SERVICES

In addition to M2 Energy’s internal complaint management processes, M2 Energy’s Customers also have access to an alternative dispute handling mechanism.

Each State has an Energy Ombudsman service which has been established to assist Customers with complaints and Disputes associated with the Energy Industry. These services are free and independent alternative dispute resolution schemes

M2 Energy will establish and maintain membership with each scheme prior to commencing retail activities in each state.

9. KEY ROLES AND RESPONSIBILITIES

The following roles and responsibilities are key to the successful operation of this Policy:

Role	Responsibility
Chief Operations Officer	<p>Is responsible for establishing and maintaining a Policy and framework that supports effective complaint management, which includes the adequate resourcing, communication, promotion, and periodic review of the Policy.</p> <p>Will appoint a Complaint Management Manager, and will ensure that there is a process in place for timely and appropriate notification of significant complaints and regular reporting on complaint management.</p>
General Manager Customer Operations	<p>Will be the designated Complaint Management Manager, and is responsible for:</p> <p>Establishing processes for monitoring, reviewing, and reporting against the performance of the complaint handling process, and providing this information to the Chief Operations Officer or his delegate and Senior Management.</p> <p>Ensuring that the complaint handling processes and operations are effective and efficient, meet targets and time-frames, and use the appropriate equipment, systems, and personnel.</p> <p>Ensuring recommendations arising out of complaint data analysis are canvassed with Senior Management and implemented as appropriate.</p> <p>Recruiting, training and empowering staff to resolve complaints promptly and in accordance with M2 Energy’s policies and procedures.</p> <p>Encouraging staff managing complaints to provide suggestions on ways to improve the organisation’s complaint management system.</p> <p>Encouraging all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Recognising and rewarding good complaint handling by staff</p>
Operational managers and supervisors	<p>Are responsible for:</p> <p>The implementation of this Policy, principles and processes and ensuring that it operates effectively, efficiently and in an accessible manner.</p> <p>Ensuring that complaints are recorded, resolved and corrective actions taken to prevent problems re-occurring.</p> <p>The timely capture, analysis and reporting of information to each other and to Senior Management.</p> <p>Ensuring that the complaint-handling framework is constantly monitored, assessed, and improved.</p> <p>Encouraging staff managing complaints to provide suggestions on ways to improve the organisation’s complaint management system.</p> <p>Encouraging all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly.</p> <p>Recognising and rewarding good complaint handling by staff</p>
Staff handling complaints	<p>All staff handling complaints should—</p> <ul style="list-style-type: none"> • be appropriately trained in complaint management and the implementation of complaint management procedures relevant to their role, including specific training on receiving and resolving complaints from disadvantaged and vulnerable people who need assistance; • be able to identify and effectively respond to people’s support and communication needs and preferences; • treat complainants in a respectful and courteous manner; • comply with all complaint management reporting requirements determined by the organisation; and • comply with the organisation’s complaint management Policy and procedures. <p>All M2 Energy employees are responsible for recording, reporting and dealing with complaints in a caring, timely, and Customer-focussed manner in accordance with this Policy.</p> <p>They must ensure that they understand M2 Energy’s Customer complaints principles and processes, and take responsibility for resolving complaints within the agreed timeframes.</p>

COMPLAINTS MANAGEMENT POLICY

10. RELATED POLICIES AND PROCEDURES

The following Policies and Procedures influence or are referred to in this Policy.

Document Reference Number	M2 Energy Pty Ltd Document Policy Title
M2E 200-313	M2 Energy National Compliance Plan
	Vocus Group Compliance Policy
	Vocus Group Sustainability Principles
	Complaints Handling Process

11. INTERNAL MONITORING, AUDITING AND REVIEWING

11.1. Compliance to Standards

This version of the M2 Energy Complaint Management Policy has been developed and reviewed in accordance with the Australian Standard Guidelines for complaint handling in organisations (ISO 10002:2014).

11.2. Review and Continuous improvement

M2 Energy will continually monitor our complaint management system to:

- Ensure and review its effectiveness in responding to and resolving complaints and Disputes, and
- 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.

M2 Energy is also committed to reviewing and improving the effectiveness and efficiency of our complaint management system. To achieve this M2 Energy will:

- support the making and appropriate resolution of complaints by Customers and other relevant parties
- identify and seek to implement industry best practice in complaint handling
- recognise and reward exemplary complaint handling by staff
- regularly review the complaints management system and complaint data, and
- implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

12. RECORD MANAGEMENT

Complaint information will be primarily stored on a Customer's account.

Written correspondence from Customers will be recorded, actioned and filed in accordance with the Customer Operations processes and procedures. Written replies shall be stored electronically in accordance with Customer Operations processes and procedures and must be referenced on the Customer's account.

Electronic and physical complaint records will be kept in accordance M2 Energy and Vocus Group Policies.