

# Commander Power & Gas

## Complaint Management Policy

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# 1 DOCUMENT APPROVAL

This Commander Power & Gas Complaint Management Policy is sponsored and approved by:

Business Director: Scott Carter

| Date | Signature |
|------|-----------|
|      |           |

# 2 GLOSSARY/ACRONIMS/TECHNICAL TERMS

| Name                          | Description  |
|-------------------------------|--|
| <b>CPG</b>                    | Commander Power & Gas  |
| <b>Commander</b>              | Commander Services   |
| <b>Critical Procedure</b>     | Procedure based on Regulation or Industry Code that, if not complied with, carries possible penalties or other significant risk to CPG.  |
| <b>Non-Critical Procedure</b> | Procedure that is not based on Regulation or Industry Code or carry significant risk. Typically this would follow Best Practices.  |
| <b>Open Complaint</b>         | A complaint case that is open, as opposed to being pended or resolved. It may or may not have been assigned  |
| <b>Resolved Complaint</b>     | A complaint is considered resolved or closed after CPG has advised a resolution to the customer which has been accepted and any actions required on CPG's part have been completed. A complaint can also be closed if CPG 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. |
| <b>Feedback</b>               | Information or compliment about an action, policy, process, or outcome related to Commander Power & Gas activities.  |
| <b>First Call Resolution</b>  | A complaint can only be considered as resolved on 1 <sup>st</sup> call if the customer has agreed to the resolution offered by the 1 <sup>st</sup> contact agent and no escalation has taken place, or is organized to take place  |
| <b>Complainant</b>            | A Person, organisation or its representative who makes a complaint about Commander Power & Gas.  |
| <b>Complaint</b>              | Any grievance or expression of dissatisfaction made to Commander Power & Gas by a customer or member of the public, about any product, service or activity of Commander Power & Gas.   |
| <b>Customer</b>               | An organisation or person that receives a Commander Power & Gas product.   |
| <b>Customer Satisfaction</b>  | A customer's perception of the degree to which the customer's requirements have been fulfilled.  |
| <b>Customer Service</b>       | An interaction of the organisation with the customer throughout the life cycle of a product.   |

| Name                    | Description   |
|-------------------------|---|
| <b>Feedback</b>         | Opinions, comments and expressions of interest in the products or the complaints-handling process.                                    |
| <b>Interested Party</b> | A person or group having an interest in the performance or success of Commander Power & Gas.  |
| <b>Objective</b>        | Something sought, or aimed for, related to complaints handling.   |
| <b>Policy</b>           | The overall intentions and direction of Commander Power & Gas related to complaints handling, as formally expressed by top management |
| <b>Process</b>          | A set of interrelated or interacting activities which transforms inputs into outputs.   |

### 3 OVERVIEW

#### 3.1 DOCUMENT PURPOSE

This is a policy document that describes the Commander Power & Gas approach to complaints; customers who provide feedback, and complaint management.

#### 3.2 SCOPE

This policy encompasses:

- Complaints and feedback about CPG's products, services, policies, processes, people, or actions.
- Dealing with Complainants and Interested Parties;
- Complaint investigation procedures and root cause analysis processes;
- Complaint escalation processes;
- Responsibilities associated with handling, resolving, escalating and reporting complaints within Commander Power & Gas;
- A standard national approach to Complaint handling and management;
- State and National regulatory requirements.

#### 3.3 POLICY DESCRIPTION

##### 3.3.1 PURPOSE OF POLICY

The purpose of this policy is to:

- Ensure that customers can provide feedback and make complaints quickly, easily and with confidence;

- Ensure Commander Power & Gas 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 Commander Power & Gas handle complaints effectively and are not escalated to ombudsman complaints;
- Ensure involvement and commitment through the assistance of CPG top management and personnel ongoing training;
- To attempt to resolve complaints in a manner that is acceptable to all parties;
- Establish and maintain a high level of customer satisfaction with Commander Power & Gas and Commander Power & Gas products and services;
- Ensure that Commander Power & Gas fulfils the regulatory and legislative requirements of various Australian jurisdictions.

### 3.3.2 BUSINESS RULES

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;
- All customers will be advised of the outcome of their complaint as soon as reasonably possible but in any event within 20 Business Days;
- 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 CPG's Privacy policy;
- All customers must be advised of their right to escalate their complaint to their Energy Ombudsman if they are not satisfied with CPG's response;

## 4 COMPLAINT MANAGEMENT POLICY

The following information details the Commander Power & Gas Complaints Management Policy.

### 4.1 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 customer's 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. In fact, research has shown that only 1 in 8 customers make a complaint, so it is important that we make the process as easy as possible it is essential that these complaints are resolved quickly, and to the customer's satisfaction.

Commander Power & Gas understands that customers who have experienced problems are likely to discuss them with family and friends which could potentially damage CPG's reputation.

This Complaints Management Policy has been established to create a framework so that customers can easily make a complaint. All complaints are 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 will provide clear and concise information to customers regarding our complaint management policy including how they can submit a complaint. This policy document 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 Energy Ombudsman (or equivalent) Service, at no cost.

## 4.2 DEFINITION OF COMPLAINT

A 'complaint' is defined as any grievance or expression of dissatisfaction made to Commander Power & Gas by a customer or member of the public, about any product, service or activity of Commander Power & Gas.

## 4.3 OUR OBJECTIVES

The objective of this Complaint Management Policy is to provide management, employees, and customers with guidance on complaint handling and management within Commander Power & Gas. This policy also aims to:

- Establish an effective, efficient and accessible complaints handling and management system;
- 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;
- Enable the provision of better products and services through effective complaint analysis and process improvement.

## 4.4 OUR GUIDING PRINCIPLES

The guiding principles to CPG's complaint management processes are:

- to provide easy access to responsive complaint and feedback processes for all customers, including those with those with disabilities and language difficulties;

- 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 Commander Power & Gas Privacy Policy;
- to enable customers to authorise advocates and representatives to assist them with their complaint;
- to record and resolve complaints at first contact and, if necessary escalate them to a responsible 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 complaints within 48 working hours,
- to suspend collection activity and payment of disputed amounts, while a complaint is being investigated;
- to assess and action complaints in a timely manner, and advise customers of the outcome of their complaint as soon as reasonably possible but in any event within 20 Business Days;
- 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 processes and rationale that is not constrained or flawed;
- to ensure that customers understand their right to escalate their complaint to the appropriate State Ombudsman if they are not satisfied with Our 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 provide written responses to customers, where requested;
- to resolve 80% of all complaints within 5 working days;
- 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 complaints management;

- to provide systems to enable the recording, tracking, reporting and analysis of customer feedback and complaints;
- to continuously improve on our customer service and complaints processes.

### 5 KEY ROLES AND RESPONSIBILITIES

The following roles and responsibilities are.....

| ROLE                                      | RESPONSIBILITY   |
|---|--|
| <b>The Chief Operating Officer</b>        | The Chief Operating Officer 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.  |
| <b>The CPG Management Team</b>            | The CPG Management Team is responsible for implementation of the complaints management policy, principles and processes and ensuring that it operates effectively, efficiently and in an accessible manner. They are also responsible for the timely capture, analysis and reporting of information to each other and to senior management. Additionally they are to ensure that the complaint-handling framework is constantly monitored, assessed, and improved.   |
| <b>The Complaints Manager</b>             | The Complaints Manager is responsible for establishing processes for monitoring, reviewing, and reporting against the performance of the complaint handling process, and providing this information to the Chief Operating Officer. They are also responsible for 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.  |
| <b>Frontline Managers and Supervisors</b> | Frontline Managers and Supervisors are responsible for ensuring that the Complaints Management policy is implemented and that complaints are handled quickly, effectively and in accordance with this policy, and its principles and procedures. They should also ensure that CPG employees are appropriately trained, and resourced to allow complaints to be managed effectively and in a customer-focussed manner. It is important that training, operational processes and customer feedback is monitored and reviewed to identify service improvements. They must also liaise with the Complaints Manager, and Other Managers to implement this policy and its processes. |
| <b>All CPG employees</b>                  | All CPG employees are responsible for recording, reporting and dealing with complaints in a caring, timely, and customer-focussed manner in accordance with this policy. They must   |

|  |  |
|--|--|
|  | ensure that they understand CPG’s customer complaints principles and processes, and take responsibility for resolving complaints within the agreed timeframes. |
|--|--|

## 6 AWARENESS AND ACCESS TO COMPLAINT MECHANISMS

Commander Power & Gas’s Complaint Management Policy enables customers to easily express their dissatisfaction or make a complaint to Commander Power & Gas. This policy enables customer can easily escalate any unresolved complaints and provides them with information on how to access the Energy Ombudsman in their state.

CPG accepts customer complaints over the phone, in writing, via email or fax. Customers with disabilities and language difficulties are also able to obtain access to our complaint handling processes.

Commander Power & Gas 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 CPG 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 local Energy 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 the Complaints Handling Processes are clear and to the forefront of our thinking.

Information about our Complaints Management Policy and Processes is available via the following customer communication channels:

- CPG Website – “Tell Us About It” statement;
- CPG Bills and Notices;
- CPG Customer Charter;
- CPG Terms and Conditions;
- CPG Enquiry Management Policy.

## 7 CUSTOMER COMPLAINT AND FEEDBACK PROCESS

Customers making a complaint or providing feedback about Commander Power and Gas’s products or services, have their complaint or feedback recorded in Commander Power and Gas’s complaint case management system.

The complaint case management system is part of our Customer Information and Billing System 'Bill IT' and enables users to record, classify, and track complaints through to their resolution. The system also provides some generic advice to users when they create a complaint case, to aid quick resolution.

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

Customers will be notified within 48 working hours of the receipt of their complaint (where not made via telephone) and will be given an approximate timeframe to resolve the complaint, or an undertaking to provide an update or follow up at least every 5 working days.

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.

The Root Cause Analysis process identifies possible base causes of complaints, assists in recognising systemic issues and highlights process improvement opportunities.

To aid in the analysis process, it is essential that complaints are categorised correctly. If there does not appear to be a relevant category so that 'Other' is used, clear detailed notes must be provided so that common themes can be tracked and new categories created if required.

## 8 KEY INDICATORS

Monitoring and reviewing of the following key performance indicators form a major part of the continuous improvement of this policy:

- Customer complaints as a percentage of total complaints received;
- Number of weekly main category complaints by department;
- Written complaints acknowledged within 2 working days;
- Average days to close a complaint (total, by source);
- Number of open complaints;
- % Complaints resolved on first contact;
- % Complaints resolved within 5 working days (Service Level KPI of 80% of total complaints excluding pending complaints);
- % Complaints resolved on first contact.

Further indicators can be defined as future needs arise.

## 9 INTERNAL MONITORING, AUDITING AND REVIEWING

### 9.1 COMPLAINT TRACKING, REPORTING AND ANALYSIS

Tracking, reporting and analysis of customer complaints is a fundamental requirement for the continued improvement of CPG's general customer service processes and policies, as well as the ongoing review of this policy.

#### 9.1.1 WEEKLY

Team Leaders will review and report on open complaints that are open longer than 5 days.

Team Leaders will review all pended complaints to ensure they do not become stale.

#### 9.1.2 MONTHLY

The Complaints Manager is to prepare the following for the Chief Operating Officer and Senior Management for their review and endorsement:

- **Root Cause Analysis report, to include:**
  - a. Breakdown and analysis of the top complaint categories;
  - b. General trends in complaint types or reasons and sources;
  - c. Products, processes, policies or systems that have been identified as contributing to complaints;
  - d. Recommended changes to business products, systems or processes;
  - e. Detailed analysis of specific complaint causes, with recommendations for corrective action.
- **Service Level Report showing**

Total quantity of complaints raised during the month, indicating the quantity referred to an Ombudsman.

- f. Quantity and percentage of all complaints that were resolved within Service Level (80% within 5 working days);
- g. Quantity and percentage of all complaints to total number that were resolved at 1st contact;
- h. Quantity of all complaints still open and average age in working days;
- i. Percentage of Ombudsman Refer to Higher Levels (RHL) contacted within 24 hours (target 100%);
- j. Quantity of Ombudsman complaints still open and average age in working days;
- k. Quantity and percentage of all Ombudsman RHLs and complaints that were resolved within 5 working days (80% within 5 working days);
- l. Quantity of all complaints pended;
- m. Quantity of Ombudsman complaints pended;
- n. Team Leader's report on the status of all complaints, open or pended, older than 30 days.

Other reports can be added from time to time on an as needs basis.

### 9.2 ENERGY OMBUDSMAN SERVICES

In addition to Commander Power & Gas's internal complaint management processes, 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

Commander Power & Gas will establish membership with each scheme prior to commencing retail activities in each state.

A direct contact number for these services to contact our complaints handling team has been established.

Referrals and investigation by Ombudsman services will be investigated as a matter of urgency. Root cause analysis of these cases will be completed by the complaints manager on a weekly basis and provided to Senior Management.

### 9.3 PROGRAM REVIEW AND CONTINUOUS IMPROVEMENT

Capturing customer complaints and feedback about Commander's products and establishing an effective reporting program will allow Commander to identify opportunities for the business to improve upon our processes, training and systems.

Periodically as required, and at least annually, this policy and its processes will be reviewed to ensure that it continues to meet the needs of our customers and our business. Annual customer surveys will help to identify if complaints have been treated objectively.

The review shall take into consideration the continuing suitability of the policy and its objectives and its demonstrated ability to achieve those objectives. The review should identify any instances of non-conformance, or process deficiencies as well as a sample of complaints, and complaint analyses. The review will identify process and product improvements and provide recommendations for changes to policies, products, and processes.

Should any significant changes be made that could potentially affect customers accessing these processes, we will advise customers of these changes within 16 weeks. The appropriate Energy Ombudsman schemes are provided with a copy of any changes

A regular program of Compliance Self-Assessment will test the complaint handling processes as well as staff awareness to the policy and procedures. Testing will be performed on a quarterly basis by the Compliance Analyst using the Complaints Handling Compliance Self-Assessment Test.

## 10 RECORD MANAGEMENT

Complaint information will be primarily stored on the customer account complaint case.

Written correspondence from customers will be recorded, actioned and filed in accordance with the correspondence management procedure. Written replies shall be stored electronically in accordance with the Correspondence Management Policy and referenced on the customer's account.

Electronic and physical complaint records will be kept for 7 years.

## 11 RELATED POLICIES AND PROCEDURES

The following Commander Power & Gas policies and processes are related to the operation of this policy:

| Document Reference Number | Commander Power & Gas Document Policy Title |
|---------------------------|---|
| PL.SV.01                  | CPG Privacy Policy                          |

## 12 COMPLIANCE TO STANDARDS

This version of the Commander Complaint Management Policy has been developed and reviewed in accordance with Australian Standard - Customer satisfaction – Guidelines for complaint handling in organisations (ISO 10002:2006).

## 13 DOCUMENT REVIEW AND CONTINUOUS IMPROVEMENT

This **Commander Power & Gas Complaint Management Policy** shall be reviewed and updated:

- 1/07/2014

The document review will be undertaken by Regulatory Operations Manager Andrew Mair.

## 14 APPENDIXES

### APPENDIX 1: "TELL US ABOUT IT"

Tell us about it  
Commander Power & Gas's  
FEEDBACK AND COMPLAINT POLICY

Please tell us if you have any concerns or complaints about our service.

We at Commander Power & Gas are committed to providing excellent customer service. To do that we need to know where things are going wrong, and we need you to help us.

So please tell us about any concerns, problems, or complaints you may have about our products or services. We also welcome any helpful comments or compliments you may want to make about our staff or products.

We do take your feedback seriously, as we think it is the best way for us to identify and correct our problems, all of which will help improve our services to you.

**Talk to us first!**

Please call us on 1300 857 073 and let one of our customer service representatives know about your problem or complaint. We will try to resolve your problem right away, and if we cannot, we will take steps to get the problem resolved as quickly as possible.

You can email one of our dedicated email addresses:

[cpg.customercare@commander.com](mailto:cpg.customercare@commander.com) – **Complaints** – If you have a complaint that you would like resolved, you can e-mail this address. Please provide your username, account number, date of birth, contact phone number, your address, and details of your complaint.

[cpg.customercare@commander.com](mailto:cpg.customercare@commander.com) – **Compliments and feedback** – Not looking for a reply and just want to provide us with general feedback or wanting to pass on a compliment about one of our staff, please email this address.

[cpg.privacy@commander.com](mailto:cpg.privacy@commander.com) – **Privacy complaints** – If your complaint relates to how we have collected, held, used or disclosed personal information, please address your complaint our Privacy Compliance Officer.

You can also send a letter detailing your concern or complaint to:

Remember - we are always happy to provide you with a written response, all you have to do is ask.

### If you are still unhappy with Commander Power and Gas

If you are unhappy with our efforts to resolve your complaint or problem, then you have the **right** to ask to have your complaint referred to a higher level within our customer service centre. We will have a complaint manager review your problem and provide you with a prompt response.

### You can also get an independent review of your complaint.

If you remain unhappy with our resolution of your complaint, you also have the right to refer the complaint to your local Energy Ombudsman (see below). Each state's has an Ombudsman service which is a free and independent alternative dispute resolution scheme for energy customers.

## Victoria

### **Energy and Water Ombudsman (Victoria) Ltd (EWOV)**

Freecall: 1800 500 509 Freefax: 1800 500 549

Interpreter services: 131 450 National Relay Service: 133 677

Email: ewovinfo@ewov.com.au

Mail: GPO Box 469 Melbourne VIC 3001

## New South Wales

### **Energy and Water Ombudsman (New South Wales) Ltd (EWON)**

Office hours: Monday-Friday, 9am-5pm (excluding public holidays)

Freecall: 1800 246 545 Freefax: 1800 812 291

Interpreter services: 131 450 National Relay Service: 133 677

Email: omb@ewon.com.au

Mail: (Freepost) Reply Paid K1343, Haymarket NSW 1239

## South Australia

### **Energy Industry Ombudsman South Australia (EIOSA)**

Free call 1800 665 565 Free fax 1800 665 165

Email: contact@eiosa.com.au

Mail: GPO Box 2947 Adelaide SA 5001

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