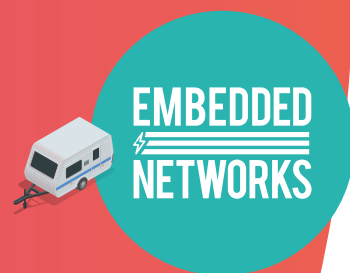


Complaint handling guidelines

for embedded networks

March 2023



Our service is free,
fair and independent.

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Energy & Water
Ombudsman
Queensland

INTRODUCTION

EWOQ's role with embedded networks

From 28 February 2022, if you supply electricity to residential customers through an embedded network, you must become a member of Energy and Water Ombudsman Queensland (EWOQ). From this date, we can help residential embedded network customers resolve issues with their electricity bills or power supply.

EWOQ is a free, fair and independent dispute resolution service. We help residents and small business customers across Queensland who have a problem with their electricity or gas providers, and those in South East Queensland with water issues too.

How to use this guide

The Australian Energy Regulator (Retail) Exempt Selling Guideline requires exempt sellers (embedded network owners and operators) to develop a procedure for handling complaints and disputes. It must be consistent with the *Australian Standard AS/NZS 10002:2022 Guidelines for complaint management in organizations* as amended and updated from time to time. It should be publicly available to your customers, such as on your website, if you have one.

To help, we've created these complaint handling guidelines for you. You can use these to create your own complaint handling policy. Although you'll have your own style for presenting your policy and procedures, we encourage you to use plain English.

We acknowledge the Traditional Owners and their custodianship of the lands, seas and waters of Queensland. We pay our respects to First Nations Elders past and present, and their future leaders, who continue cultural and spiritual connections to Country. We recognise and respect their valuable contributions to Australia and global society.

Acknowledgements

These guidelines are based on the complaint handling policy templates produced by the Energy and Water Ombudsman NSW and the Energy and Water Ombudsman Victoria. We have adapted their templates to create these guidelines with their agreement.

GUIDELINES FOR YOU TO USE

1. Purpose

We have this complaint handling policy to ensure we deal with complaints fairly, efficiently, and effectively.

Our complaints management system:

- » enables us to quickly respond to complaints in a cost-effective way
- » boosts customer confidence in our work
- » informs us about ways to improve our products, services, team and complaint handling.

This policy guides both our staff and customers who wish to make a complaint on the principles of our complaint handling system.

2. Scope

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

3. Our staff commitment

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



Complaint handling guidelines

The following table outlines the commitment expected from our staff and the way this commitment should be shown.

WHO	COMMITMENT	HOW
Head of company/ CEO	Promote a culture that values complaints and their effective resolution	<ul style="list-style-type: none"> » Report publicly on our complaint handling » Give adequate support and direction to staff responsible for complaint handling » Regularly read reports about complaint trends and issues arising from complaints » Encourage all staff to be alert to complaints and help those responsible for handling complaints resolve them quickly » Encourage staff to make recommendations for system improvements » Recognise and reward good complaint handling by staff » Support recommendations for product, service staff and complaint handling improvements arising from the analysis of complaint data
Manager responsible for complaint handling	Establish and maintain our complaint management system	<ul style="list-style-type: none"> » Give regular reports to the head of the company on issues arising from complaint handling work » Ensure recommendations arising out of complaint data analysis are raised with the head of the company and implemented where appropriate » Recruit, train and empower staff to resolve complaints quickly and in accordance with policies and procedures » Encourage staff handling complaints to give suggestions on ways to improve our complaint management system » Encourage all staff to be alert to complaints and help those responsible for handling complaints resolve them quickly » Recognise and reward good complaint handling by staff
Staff whose duties include complaint handling	Demonstrate excellent complaint handling practices	<ul style="list-style-type: none"> » Treat all customers with respect, including customers who make complaints » If needed, help customers make a complaint » Comply with this policy and its associated procedures » Stay informed about best practice in complaint handling » Give feedback to management on issues arising from complaints » Give suggestions to management on ways to improve our complaint handling system » Implement changes arising from the analysis of complaint data, as directed by management
All staff	Understand and comply with our complaint handling practices	<ul style="list-style-type: none"> » Treat all customers with respect, including customers who make complaints » Be aware of our complaint handling policies and procedures » Help customers who wish to make complaints to access our complaints handling process » Be alert to complaints and help staff handling complaints resolve matters quickly » Give feedback to management on issues arising from complaints » Implement changes arising from the analysis of complaint data, as directed by management

4. How we handle complaints

We're people focused

We seek feedback and receive complaints about our services, systems, practices, procedures and products.

We handle complaints and feedback within a reasonable timeframe.

Customers making complaints will be:

- » given information about our complaint handling process
- » told about how to contact us
- » listened to, treated with respect and actively involved in the complaint handling process, where appropriate
- » given reasons for our decision and any options for redress or review.

We won't treat customers who complain any differently

We won't treat customers any differently if they complain to us.

Customers making complaints won't be adversely affected because a complaint has been made by them or on their behalf.

We accept anonymous complaints

You don't have to give us your name when you complain. We will investigate the issue if enough information is provided. It may be difficult to let you know the outcome if we don't know who raised the issue.

We're accessible

Information about how to make a complaint is easily accessible for customers, including information about how we handle complaints.

We'll give customers information about their right to contact the Energy and Water Ombudsman Queensland (EWOQ) if they're dissatisfied with our handling of their complaint, or need free and independent advice and information. We'll clearly display EWOQ's contact details at easily accessible locations on our website.

Complaining is free

Complaining to us is free. No costs will be imposed on customers as a result of them complaining to us.

We're quick to respond

We'll acknowledge complaints received quickly. Where possible, complaints will be resolved when a customer first contacts us.

We'll access and prioritise complaints based on the urgency and seriousness of the issue. We'll respond immediately to matters where there's an immediate risk to safety or security.

We're committed to managing our customer's expectations and will tell them as soon as possible, of:

- » our complaints handling process
- » the expected timeframes for our actions
- » the progress of their complaint and reasons for any delay
- » their likely involvement in the process
- » the possible or likely outcome of their complaint.

We're objective and fair

We'll handle each complaint with integrity and in an equitable, objective and unbiased manner. Where possible, we'll ensure that the staff member handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interest, actual or perceived, will be managed responsibly. Particularly, internal reviews of how a complaint was handled, will be conducted by a staff member other than the original decision maker.

We're flexible

Our staff are empowered to resolve complaints quickly and with as little formality as possible. We'll adopt flexible approaches to service delivery and problem solving to make it easier for customers to make complaints.

We'll assess each complaint on its merits and involve customers making complaints, or their representative, in the process as much as possible.

Confidentiality

We'll protect the identity of customers 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 confidentiality obligations.

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Complaints involving other organisations

We'll work with other organisations, when necessary, to ensure that communication with the customer making a complaint, or their representative, is clear and coordinated. Subject to privacy and confidentiality considerations, our communication and information sharing will be organised to help get a quick response to the complaint.

If a complaint involves other areas of our company, we'll coordinate our communication with the customer making the complaint, or their representative.

If we've outsourced our services to another organisation, we expect that organisation to have an accessible and comprehensive complaints management system.

We take complaints about the actions of our outsourced organisations as well as about our staff.

Complaints from several customers

When we receive similar complaints from related customers, we'll try to communicate with a single representative of the group. We'd expect that customer to advise the others about the progress of their complaint.

Our staff are empowered

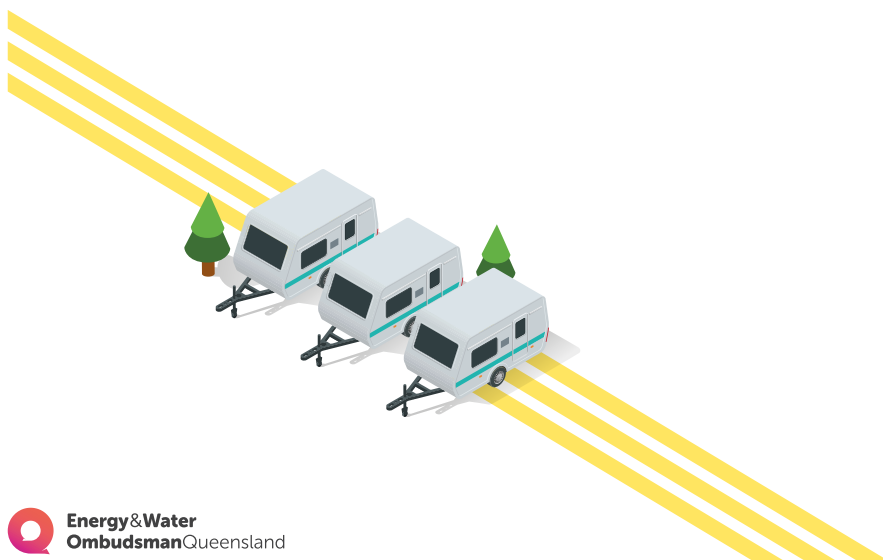
All of our staff who handle complaints, have authority to implement our complaint handling system, as relevant to their roles and responsibilities. Our staff are encouraged to provide feedback on the effectiveness and efficiency of our complaint handling system.

Managing unreasonable conduct by customers making complaints

We're committed to being accessible and responsive to customers who approach us with feedback or a complaint. Our success depends on:

- » our ability to do our work and perform our functions effectively and efficiently
- » the health, safety and security of our staff
- » our ability to allocate our resources fairly across all the complaints we receive.

If customers behave unreasonably in their dealings with us, this can affect the progress and efficiency of our work. Therefore, we'll take proactive and decisive action to manage unreasonable behaviour. We'll support our staff to do the same.



5. Our complaint handling system

Introduction

When responding to complaints, our staff will follow our complaints handling procedures and any other internal documentation on the management of complaints. They'll also consider any legislative and regulatory requirements.

The key stages of our complaint handling system are detailed below.

How we acknowledge complaints

We'll acknowledge receipt of each complaint quickly, preferably within (insert number) business days. We'll consider the most appropriate method of communication (for example, email, letter) for communicating with the customer making the complaint.

How we first assess complaints

After we acknowledge receipt of a complaint, we'll assess if the issues raised in it are within our control. We'll also consider the outcome that the customer who made the complaint is seeking.

If multiple issues have been raised, we'll decide if each issue needs to be separately addressed. In assessing how a complaint will be handled, we'll consider:

- » if the complaint is serious, complex or urgent
- » if the complaint identifies health and safety issues
- » how the customer making the complaint is being affected
- » the risks if resolution of the complaint is delayed
- » if resolution of the complaint requires involvement of other organisations.

How we address complaints

First, we assess the complaint, then we consider the best way to manage it. In handling a complaint, we may:

- » give the customer making the complaint information or an explanation
- » gather information about the issue or person the complaint relates to
- » investigate claims made in the complaint.

We'll keep the customer who made the complaint updated on our progress, especially if there are delays, using the most appropriate method of communication.

Our actions will be specific to the complaint, considering any statutory requirements.

Giving reasons for our decisions

After investigating a complaint, we'll contact the customer who made the complaint, to advise them of the:

- » outcome of their complaint and any action we took
- » reasons for our decision
- » resolution we're proposing or have put in place
- » options for review of their complaint, such as an internal review or forwarding their complaint to EWOQ, who provide a free and independent dispute resolution service.

Alternative options for dealing with complaints

We'll advise customers who make complaints to us about their option to have their complaint reviewed internally by us, or externally by EWOQ.

We keep records and implement outcomes

We'll keep a record and notes about:

- » how we handled the complaint
- » the outcome of the complaint and if it, or parts of it, were confirmed
- » actions or recommendations taken to address any issues, and decisions we made based on those actions or recommendations

The outcomes from the complaint will be implemented, monitored and reported to senior management.

NOTE: EWOQ's contact details should be readily available and accessible to your customers via your website and in your correspondence with them.

Energy and Water Ombudsman Queensland

Phone 1800 662 837 (if you're calling from a mobile, ask them to call you back)

Email embedded@ewoq.com.au

Website www.ewoq.com.au

Post PO Box 3640, South Brisbane BC Qld 4101

6. We're accountable and we'll learn

We will analyse and evaluate complaints

We'll record complaints so that information can be easily obtained for reporting and analysis.

We'll run regular reports on the:

- » number of complaints we've received
- » outcome of complaints
- » issues identified from complaints
- » systemic issues we identify
- » number of requests we've received for internal and external review of our complaint handling.

We will carry out regular analysis of these reports to monitor trends, to measure the quality of our customer service and to make improvements.

We will give reports and their analysis to our company CEO and senior management for review.

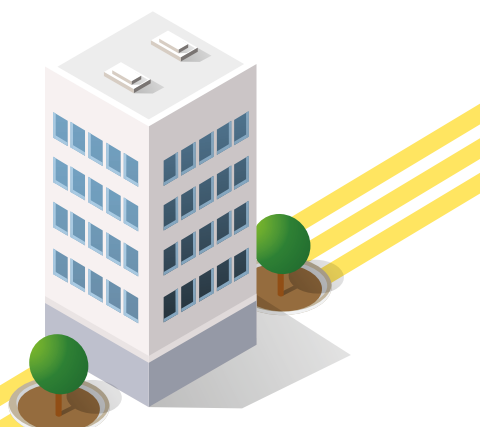
We will improve

We're committed to an effective and efficient complaint handling system and will improve it by:

- » making the most appropriate resolution of complaints
- » implementing best practice in complaint handling
- » regularly reviewing our complaint handling system
- » regularly reviewing complaint data
- » recognising exceptional complaint handling by our staff
- » implementing system changes identified from the analysis of data
- » correcting any errors or deficiencies of our complaint handling system.

Date approved - / /

Review date - / /



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7. Terms and definitions

Complaint

An expression of dissatisfaction made 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.

Policy

A statement that sets out how we should fulfil our vision, mission and goals.

Procedure

A statement or instruction that sets out how our policies will be implemented and by whom.

8. Additional complaint handling resources

- » AS/NZS 10002:2022 Guidelines for complaint management in organizations
- » Society of Consumer Affairs Professionals - Small Business Complaints Toolkit
- » Queensland Ombudsman, Policy and procedure guide
- » Commonwealth Ombudsman, Better practice guide to complaint handling, April 2009

CONTACT US

Call us

1800 662 837

Calling from a mobile? We can call you back.

Email us

embedded@ewoq.com.au

Chat with us

Talk with us in real time during business hours through the chat function at www.ewoq.com.au

Write to us

PO Box 3640, South Brisbane BC Qld 4101

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