



**Bright  
Spark  
Power**

# **COMPLAINTS HANDLING POLICY**

1 October 2020



## Introduction

### Policy 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, and
- 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.

<b>Who</b>	<b>Commitment</b>	<b>How</b>
Bright Spark Power Directors	Promote a culture that values complaints and their effective resolution	Report publicly on Bright Spark Power's complaint handling. Provide adequate support and direction to key staff responsible for handling complaints. Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. 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 manage our complaint management system	Provide regular reports to the Directors of Bright Spark Power on issues arising from complaints handling work. Ensure recommendations arising out of complaint data analysis are canvassed with the Directors and implemented where appropriate. Recruit, train and empower staff to resolve complaints promptly and in accordance with Bright Spark Power's policies and procedures. Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system. Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly. Recognise and reward good complaint handling by staff.
Staff whose duties include complaint handling	Demonstrate exemplary complaint handling practices	Treat all people with respect, including people who make complaints. Assist people make a complaint, if needed. Comply with this policy and its associated procedures. Keep informed about best practice complaint handling. Provide feedback to management on issues arising from complaints. Provide suggestions to management on ways to improve the organisation's complaints management system. Implement changes arising from individual complaints and from the analysis of complaints data as directed by management.
All staff	Understand and comply with Bright Spark Power's complaint handling practices	Treat all people with respect, including people who make complaints. Be aware of Bright Spark Power's complaint handling policy and procedures. Assist people who wish to make a complaint access Bright Spark Power's complaint process. Be alert to complaints and assist staff handling complaints resolve matters promptly. Provide feedback to management on issues arising from complaints. Implement changes arising from individual complaints and from the analysis of complaints data as directed by management.



## Terms and Definitions

### Complaint

Expression of dissatisfaction made to or about us, our products, services, staff of the handling of a complaint where a response or resolution is explicitly or implicitly expected or legally required.

### Complaint management system

All policies, procedure, practices, staff, hardware and software used by us in the management of complaints.

### Policy

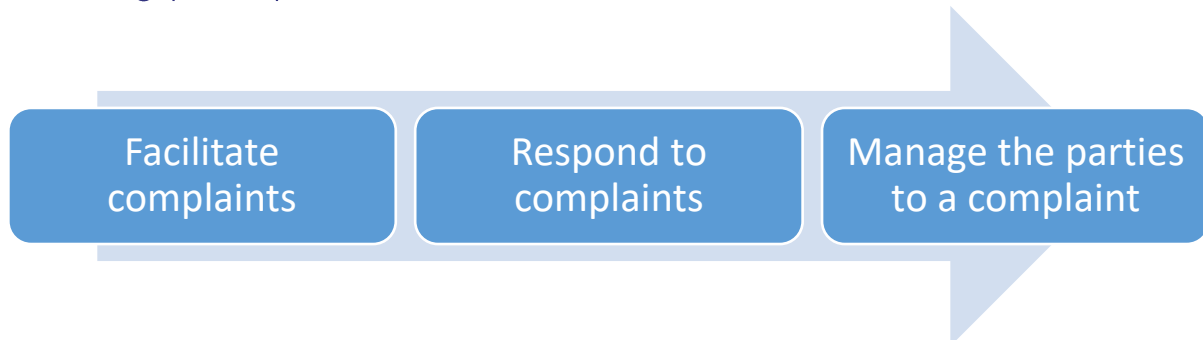
A statement of instruction that sets out how we should fulfil our vision, mission and goals.

### Procedure

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



## 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 multiples and accessible ways to make complaints
- listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate, and
- 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 and Water Ombudsman in their state at any time for independent advice and information, as well as go to the Ombudsman if they are dissatisfied with our handling of their complaint or dispute. We will provide the Ombudsman contact details on our website, for each state where we provide products and services.

#### No charge

Complaining to us is free.



## Respond to complaints

### First call resolution

Where possible, complaints will be resolved at first contact with Bright Spark Power.

### 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:

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

### Objectivity and fairness

We will address each complaint with integrity and in an equitable, objective and unbiased manner.

We will ensure that the person handling the 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.

### Responding flexibly

Our staff are empowered to resolve complaints promptly and with as little formality as possible. We will adopt flexible approaches to service delivery and problem solving to enhance accessibility for people making complaints and/or their representatives.

We will assess each complaint on its merits and involve people making complaints and/or their representatives in the process as far as possible.

### 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 by Bright Spark Power 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 to 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.

### 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, and
- 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.



## Complaint management system

### First call resolution



### Escalated call resolution



## Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures 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 complaints management system are set out below.

1. *Receipt of complaints*
2. *Acknowledgement of complaints*
3. *Initial assessment and addressing of complaints*
4. *Providing reasons for decisions*
5. *Closing the complaint, record keeping, redress and review*

## 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 (unless they wish to remain anonymous)
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information, and
- any additional support the person making a complaint requires.

## Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 2 working days.

Consideration will be given to the most appropriate medium (e.g. email, phone, letter) for communicating with the person making a complaint.





## 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, we will consider:

- 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, and
- whether a resolution requires the involvement of other organisations.

### *Addressing complaints*

After assessing the complaint, we will consider how to manage it. To manage a complaint, we may:

- give the person making a complaint information or an explanation
- gather information from the product, person or area that the complaint is about, or
- investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint 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, we will contact the person making the complaint and advise them:

- 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, and
- any options for review that may be available to the complainant, such as internal review, or external review to the independent Energy and Water Ombudsman (for their state).

### *Closing the complaint, record keeping, redress and review*

We will keep comprehensive records about:

- how we managed the complaint
- 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, and
- any outstanding actions that need to be followed up.



We will ensure that outcomes are properly implemented, monitored and reported to the complaint handling manager and/or senior management.

### Right to access the Energy and Water Ombudsman

We will inform people who make complaints to or about us any internal or external review options available to them, including the Energy and Water Ombudsman for their state.

All our customers have the right to contact the Energy and Water Ombudsman at any time for independent advice and assistance.

<b>Energy &amp; Water Ombudsman NSW (EWON)</b>	
<b>Freecall</b>	1800 246 545
<b>Freefax</b>	1800 812 291
<b>Post</b>	Reply Paid 86550, Sydney South NSW 1234
<b>Email</b>	<a href="mailto:complaints@ewon.com.au">complaints@ewon.com.au</a>
<b>Website</b>	<a href="http://www.ewon.com.au">www.ewon.com.au</a>

<b>Energy &amp; Water Ombudsman QLD (EWOQ)</b>	
<b>Freecall</b>	1800 662 837
<b>Fax</b>	(07) 3087 9477
<b>Post</b>	PO Box 3640, South Brisbane BC QLD 4101
<b>Email</b>	<a href="mailto:complaints@ewoq.com.au">complaints@ewoq.com.au</a>
<b>Website</b>	<a href="http://www.ewoq.com.au">www.ewoq.com.au</a>



## Accountability and learning

### Analysis and evaluation of complaints

We will ensure that 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, and
- 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 Bright Spark Power's Directors and senior management for review.

### Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- ensure its effectiveness in responding to and resolving complaints, 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.

### Continuous improvement

We are committed to improving the effectiveness and efficiency of our 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, and
- implement appropriate system changes arising out of our analysis or complaints data and continual monitoring of the system.

### Approval and review

This policy is approved by the Bright Spark Power Board and company Directors.

This policy is to be reviewed in line with the Bright Spark Power's annual policy review process or as required by an external event, such as regulatory change.