



# Complaint Handling Policy

For embedded networks

July 2023

# Introduction

## **EWOV's role with embedded networks**

From 1 July 2018, Victorian embedded networks were required to become members of the Energy and Water Ombudsman (Victoria) (EWOV). From this date, Residents who have their electricity supplied through an embedded network can lodge complaints with EWOV.

EWOV provides an independent and impartial dispute resolution service for both Victorian energy and water Residents and our members.

We work with energy and water companies, regulators, governments and consumer groups to drive Residents service improvements and help prevent complaints.

EWOV has 25 years' experience in resolving in excess of 650,000 energy and water complaints.

## **We must have a complaint handling policy**

Under the *Energy Retail Code*, we are required to have an internal policy about how we handle Residents complaints. The policy should be publicly available to our Residents.

## **Acknowledgements**

This policy is based on the *Complaint Handling Policy Template* produced by the Energy & Water Ombudsman.

With their agreement, we have adapted the template.

# Complaint Handling Policy

## ① Purpose

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

Our complaint management system:

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

This policy guides both our staff, and Residents who wish to make a complaint, on the principles of our complaint management system.

## ② Scope

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

## ③ Our staff commitment

Armstrong Green Village Services Inc. 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 commitment should be shown.

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

## ④ How we deal with complaints

### We're Resident focused

We seek feedback and complaints about our electricity services, systems, practices, procedures, products, and complaint handling.

We will deal with feedback and complaints within a reasonable time frame.

Residents making complaints will be:

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

### We won't treat Residents who complain any differently

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

Residents making complaints will not be adversely affected because a complaint has been made by them or on their behalf.

### We accept anonymous complaints

We accept anonymous complaints and will investigate the issue if enough information is provided.

### We're accessible

Information about how to make a complaint must be easily accessible for Residents, including information on our complaints handling policy.

We will give Residents information about their right to contact the Energy and Water Ombudsman (Victoria) (EWOV) if they are dissatisfied with our handling of their complaint or need free and independent advice and information.

We will clearly display EWOV's contact details at easily accessed locations.

### Complaining is free

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

### **We're quick to respond**

We will promptly acknowledge receipt of complaints.

Where possible, complaints will be resolved when a person first contacts us.

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

We are committed to managing Residents' expectations, and will tell 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
- › the possible or likely outcome of their complaint.

### **We're objective and fair**

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

Where possible, we will ensure that the person handling a 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.

### **We're flexible**

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 make it easier for Residents to make complaints.

We will assess each complaint on its merits and involve Residents making complaints or their representative in the process, as far as possible.

## **Confidentiality**

We will protect the identity of Residents 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 any relevant confidentiality obligations.

## **Complaints involving other organisations**

We will work with the other organisations, where possible, to ensure that communication with the person 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 timely response to the complaint.

Where a complaint involves other areas within our organisation, we will coordinate our communication with the person making the complaint or their representative.

Where our services are contracted out, we expect contracted companies 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 our contracted companies and service providers.

## **Complaints from several Residents**

When similar complaints are made by related parties we will try to communicate with a single representative of the group.

## **Our staff are empowered**

All staff managing complaints are empowered to implement our complaint management system as relevant to their role and responsibilities.

Our staff are encouraged to provide feedback on the effectiveness and efficiency of all aspects of our complaint management system.

## **Managing unreasonable conduct by Residents making complaints**

We're committed to being accessible and responsive to all Residents 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
- › our ability to allocate our resources fairly across all the complaints we receive.

When Residents 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 unreasonably affects us. We will support our staff to do the same.

## ⑤ Our complaint management system

### Introduction

When responding to complaints, our staff will follow our complaint handling procedures and any other internal documents about guidance on the management of complaints.

Staff will also consider any relevant legislation and regulations when responding to complaints and feedback.

The key stages in our complaint management system are set out below.

### How we receive 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
- › issues raised by the person making a complaint and the outcome they seek
- › any additional support the person making a complaint requires
- › any other relevant information.

### How we acknowledge complaints

We will acknowledge receipt of each complaint promptly, and preferably within three (3) business days.

We will consider the most appropriate medium (e.g. email, letter) for communicating with the person making a complaint.



## How we first assess complaints

After we acknowledge receipt of the complaint, we will confirm whether the issues raised in the complaint are within our control. We will also consider the outcome sought by the person making the complaint and, where there is more than one issue, decide whether each issue needs to be separately addressed.

When deciding how a complaint will be managed, we will consider:

- › whether the complaint is serious, complicated or urgent
- › whether the complaint raises health and safety concerns
- › how the person making the complaint is being affected
- › the risks involved if resolution of the complaint is delayed
- › whether a resolution requires the involvement of other organisations.

## How we address complaints

We first assess the complaint, then we consider how to manage it. To manage a complaint we may:

- › give the person making a complaint information or an explanation
- › gather information about product, person or area that the complaint is about
- › 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 (e.g. email, letter). Our actions will be tailored to each case and take into account any statutory requirements.

## Giving reasons for our decisions

After considering and investigating the complaint, we will contact the person making the complaint to advise them of:

- › the outcome of the complaint and any action we took
- › the reasons for our decision
- › the remedy or resolution that we have proposed or put in place
- › the available options for review of the complaint, such as an internal review or an external review to the free and independent EWOV.

## We keep comprehensive records and implement outcomes

We will keep comprehensive records about:

- › how we managed the complaint
- › the outcome of the complaint, including whether it (or any aspect of it) was substantiated
- › recommendations made to address any identified problems, and any decisions we made based on those recommendations
- › any outstanding actions that need to be followed up.

The complaint outcomes will be properly implemented, monitored, and reported to the complaint handling manager or senior management.

## Alternative options for dealing with complaints

We will tell Residents who make complaints to us about the internal and external review options available to them, including contacting the EWOV.

### **Note:**

EWOV's contact details are available and accessible via their website and in Residents' correspondence.

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

Freecall	1800 500 509	Email	<a href="mailto:ewovinfo@ewov.com.au">ewovinfo@ewov.com.au</a>
Post	Reply Paid 469, Melbourne VIC 8060	Website	<a href="http://www.ewov.com.au">www.ewov.com.au</a>

## ⑥ We're accountable and will learn

### We will analyse and evaluate complaints

Complaints will be 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 we received
- › outcome of complaints, including matters resolved at the frontline
- › issues arising from complaints
- › systemic issues we identify
- › number of requests we receive 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 Residents service and to make improvements.

We will give reports and their analysis to our Committee of Management for review.

### We will monitor our complaint management system

We will monitor our complaint management system to:

- › ensure its effectiveness in responding to and resolving complaints
- › identify and correct deficiencies in the operation of the system

Our monitoring may include the use of audits, complaint satisfaction surveys and online listening tools and alerts.

## We will improve

- › 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 our complaints management system
- › regularly review complaint data
- › implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

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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.