



Ofgem

**Main GB Energy Suppliers
Audit and Best Practice Review
2008/09**

Final May 2009

PKF

Accountants &
business advisers

Contents

1	Introduction and scope	1
2	Conclusions.....	3
3	Complaints management at the main GB energy suppliers.....	8
4	Detailed assessment against the Regulations.....	11
5	Areas for further development by the main GB energy suppliers	28
6	Detailed methodology.....	33

1 Introduction and scope

- 1.1 The Consumers, Estate Agents and Redress Act 2007 (“CEAR”) required Ofgem to set new complaints handling regulations (“the Regulations”) that are binding upon regulated providers. Following extensive consultation with all key stakeholders including the energy suppliers that began in July 2007, the final Regulations were published on 1st July 2008.
- 1.2 The Regulations came into legal force on 1st October 2008 and all regulated providers were required to have made the necessary changes to their complaints handling arrangements by that time.
- 1.3 When setting the Regulations Ofgem also committed to undertaking an early independent audit and best practice review to ensure that the new Regulations have been embedded into the complaints handling procedures for regulated gas and electricity suppliers.
- 1.4 PKF were appointed to conduct this review on behalf of Ofgem. This report sets out the findings of our work on the main energy suppliers in Great Britain (“GB”). The price controlled network businesses were not included within the scope of the review and a report on small GB regulated gas and electricity suppliers will be published separately.

Scope

- 1.5 The scope of the audit covered all the standards for complaints handling as set out in the Regulations.
- 1.6 The principal areas to be reviewed therefore included the following requirements:
- common definition of a complaint;
 - to have a complaints handling procedure consistent with the Regulations;
 - to record complaints upon receipt and subsequently;
 - to signpost the redress scheme if complaints cannot be resolved;
 - to maintain the resources necessary to deal with consumer complaints in an efficient and timely manner;
 - to agree arrangements with Consumer Focus for handling vulnerable consumers and threatened or actual disconnections;
 - to agree arrangements with Consumer Direct for referrals;
 - to signpost the complaints handling procedure; and
 - to publish information on complaints.

- 1.7 The arrangements in place at all regulated providers were reviewed from licensees supplying domestic and micro business customers as defined by BERR's Order to ensure that comprehensive conclusions can be drawn regarding the operation of the new Regulations.
- 1.8 The agreed approach was based on the review of data collected from the main GB energy suppliers and a short site visit to a sample of their customer service centres to discuss the approach to complaints handling adopted by the supplier and to test on a sample basis the operation of procedures.
- 1.9 The detailed methodology that we followed is set out in Section 6 of this report.
- 1.10 This report has been prepared as part of the audit and best practice review of regulated providers under the terms of our contract with Ofgem. It has been prepared for Ofgem and we neither accept nor assume any responsibility or duty of care to any third party (including in particular the main GB energy suppliers) in relation to it.
- 1.11 The conclusions and recommendations are based on the results of the audit work carried out and are reported in good faith. However, because our methodology relies upon explanations and information provided by managers and sample testing, we recommend that Ofgem management should satisfy itself of the validity of any recommendations before acting upon them.

2 Conclusions

2.1 We have completed our review of the main GB energy suppliers' arrangements for meeting the requirements of the Regulations.

2.2 This included an assessment of their complaints handling arrangements for residential and micro-business customers and sample testing of their operation through a two day visit to a sample of their customer service centres.

2.3 Based on the results of our review work we have reached the following conclusions:

Embedding the Regulations into complaints handling procedures

2.4 We noted that all the main GB energy suppliers' internal complaints handling procedures had been revised to respond to the new Regulations.

2.5 Our review indicated that the suppliers' internal procedures clearly set out the definition of a complaint, the steps required to process complaints, the arrangements for working with Consumer Focus and Consumer Direct in relation to complaints referred by these bodies and details of the Energy Ombudsman redress scheme.

2.6 We were also provided with details of the training programmes undertaken by these companies before the new Regulations came into force on 1st October 2008. Suppliers informed us that extensive training was provided to all call centre staff, customer service advisers and managers in the key aspects of the Regulations.

2.7 We also noted that the complaints handling database systems in operation at the various suppliers were reviewed before the Regulations came into force to ensure that they were able to meet the recording requirements and were consistent with the revisions made to the suppliers' complaints handling procedures.

2.8 We therefore concluded that all the main GB energy suppliers had apparently taken the steps expected to embed the new Regulations within their internal complaints handling procedures. We were advised that complaints handling training undertaken by the suppliers in the future will continue to reflect the Regulations to ensure that the requirements become increasingly embedded in the complaints handling routines of their customer service staff.

2.9 The detailed findings of this aspect of our work are set out in Section 3 of this report.

Assessment of procedures against the Regulations

2.10 As part of our work we undertook a line by line assessment of the suppliers' published procedures against the Regulations. We noted that all the suppliers had updated their published procedures to reflect the new regulatory regime.

- 2.11 Our review indicated that the published procedures were in all cases written in clear and intelligible language as required and provided their customers with the information necessary to complain to the supplier and a step by step summary of the processes that the supplier would follow in handling their complaint.
- 2.12 We noted that all the suppliers' procedures included contact addresses, telephone numbers and email addresses for their complaints handling teams and provided for an internal investigation in the event that the customer remained dissatisfied. Details of the Energy Ombudsman redress scheme were also included in all the suppliers' published procedures.
- 2.13 Some aspects of their published complaints handling procedures did not however meet the requirements of the Regulations in full.
- 2.14 The departures from the specific requirements varied from supplier to supplier, although the most common areas where enhancements are required to ensure that the published procedures comply with the Regulations in full are as follows:

COMMON AREAS WHERE ENHANCEMENTS ARE REQUIRED TO SUPPLIERS' PUBLISHED PROCEDURES	
Access	Details of addresses where consumers may discuss their complaints on a face to face basis (or a contact telephone number so that they can obtain details of the nearest convenient location) should be provided by all the suppliers in their published procedures.
Process	The opportunity for consumers to continue their complaint orally through the whole process needs to be included.
	The likely timescales involved in investigating and resolving a consumer complaint should also be documented by all suppliers.
Remedy	Details of the remedies that the Energy Ombudsman may require the company to provide should be clearly stated.
	Specific reference should also be made to the possible award of compensation if the complaint relates to the company's sales activities.

- 2.15 We also believe that additional refinements need to be made by some of the suppliers to ensure that their published procedures meet best practice.

- 2.16 These are as follows:
- Consumers should be provided with contact details for additional sources of help such as the Citizens Advice Bureau in the published procedures; and
 - the likely outcomes of an internal investigation of a complaint by the company (including compensation where appropriate) should be described.
- 2.17 We therefore concluded that the published procedures of the main GB energy suppliers were compliant with the requirements of the Regulations in most respects.
- 2.18 The detailed findings of this aspect of our work are set out in Section 4 of this report.

Operation of procedures

- 2.19 We noted that all the suppliers included the definition of a complaint as set out in the Regulations in their internal procedures for complaints handling and expected their customer service staff to follow these procedures.
- 2.20 When we visited a sample of customer service centres for each supplier to perform sample testing to assess the extent to which their procedures and the Regulations were being followed we concluded that this was generally the case.
- 2.21 However, this is an area where it is particularly difficult to ensure consistency of approach between suppliers (and by their respective customer service centre staff) as there is an element of judgement involved on the part of the individuals who are handling customer contacts (even though we noted that extensive training was provided to staff by all the suppliers in relation to this matter) - especially in those cases where it is not necessarily self-evident that the customer is dissatisfied.
- 2.22 Based on the level of reported complaints provided to us by each supplier during the first three weeks of the operation of the new Regulations (1st to 24th October 2008) we noted that one supplier (EDF Energy) had reported a considerably lower level of complaints than the other suppliers.
- 2.23 We therefore advised this supplier to review the level of their reported complaints to confirm that they were recording all complaints in accordance with the requirements of the Regulations (Regulation 4) at each of their customer service centres. We understand that this has led to a significant increase.
- 2.24 Nevertheless, for the spot check sample of cases that we tested at all the suppliers, customer dissatisfaction was correctly being recorded as a complaint and customers were being sign-posted to the published complaints procedures and the redress scheme where required.

- 2.25 The departures that we identified were due in the main to human error.
- 2.26 We also noted that all the suppliers had put in place appropriate arrangements to deal effectively with referrals from Consumer Focus (Regulation 8) and Consumer Direct (Regulation 9). Our sample testing indicated that these arrangements were being followed by all the suppliers.
- 2.27 The principal area where our sample testing identified that enhancements are required to all the suppliers' operational arrangements is in relation to recording the handling of complaints (Regulation 5). We would expect to see a clear link between the details of the complaint, the agreed action to be taken and the final conclusion that the matter has been resolved, including confirmation that the customer is satisfied that the action taken addresses their concerns.
- 2.28 It is important that this information is recorded accurately since the supplier is required to publish details of complaints that have not been resolved at the end of the next working day in accordance with the requirements of Regulation 11. Our sample testing indicated that this was not always evident at all of the suppliers. It is also important should the customer need to re-contact the supplier that details are recorded of what was previously agreed.
- 2.29 In our view, further guidance should be provided by all suppliers to their customer service staff regarding the need to record clearly the basis upon which they consider the matter has been resolved in the closure summary and to ensure that the matter has indeed been resolved before closing the complaint on the relevant complaints management system.
- 2.30 For some of the suppliers we also noted that enhancements to their operational procedures were required in relation to the following areas:
- Checking the work of customer service staff to ensure that any follow up contact from customers is not recorded as a new complaint in error and reminding staff of the need to record all complaints on the complaints handling system (Regulation 4);
 - Ensuring up to date details of the redress scheme are placed in a prominent position on the website and that the deadlock letters that are currently in use to include a description of the various remedies available and to highlight that the decision of the Ombudsman is binding on the supplier but not upon the customer (Regulation 6); and
 - Reminding customer service staff of the requirement to signpost customers to the complaints handling procedures as soon as is reasonably practicable if their complaint cannot be resolved at the end of the next working following the day of receipt and ensuring any out of date website content is removed (Regulation 10).

- 2.31 We also noted that further work needs to be undertaken by all the suppliers to finalise their arrangements for meeting the annual reporting requirements of the Regulations by October 2009 in order to meet best practice.
- 2.32 The detailed findings of this aspect of our work are set out in Section 4 of this report.
- 2.33 For ease of reference the areas where further development is required to the suppliers' arrangements have been set out in more detail in Section 5 of this report. We provided initial oral feedback on our findings to each supplier at the end of each visit. We have also since provided detailed comments to each supplier.
- 2.34 To enable the enhancements noted above to be implemented by the suppliers, we provided each of them with a separate report, including our specific findings and an action plan in relation to their arrangements.
- 2.35 Finally, we wish to thank all members of staff for their availability, co-operation and assistance during the course of our review.

PKF (UK) LLP
May 2009

3 Complaints management at the main GB energy suppliers

Introduction

3.1 As part of our review, we collected information from each of the main energy suppliers in relation to their complaints handling procedures, the volume of complaints received and the steps that they had taken to prepare for the introduction of the new Regulations including training and system changes. This enabled us to form a view of the preparations undertaken by the suppliers to embed the Regulations within their complaints handling procedures. The findings of our work are set out below.

Complaints management arrangements

3.2 The six main GB energy suppliers are as follows:

- British Gas;
- EDF Energy;
- E.ON UK;
- npower;
- Scottish and Southern Energy; and
- ScottishPower.

3.3 As part of our review, these suppliers advised us of their respective total residential and micro-business complaints during the first 3 weeks of the operation of the new Regulations (1st to 24th October 2008). For the purposes of this review we relied upon the suppliers to provide us with accurate data regarding complaint numbers and accepted the data as unaudited.

3.4 We noted that the complaints handling management structures at the suppliers varied, reflecting how and where they conduct their business.

3.5 For example, we were advised that Scottish and Southern Energy supplies gas and electricity to its customers through its brands of Southern Electric, SWALEC, Scottish Hydroelectric and Atlantic Electricity and Gas. Its complaints management arrangements are therefore set out in the company's Statement "Complaints Handling" and customer charters for each of its brands. Complaints handling for domestic and micro-business customers is undertaken at a number of customer service centres and call centres located in Basingstoke, Cardiff, Cumbernauld, Perth and Portsmouth.

- 3.6 Npower informed us that some of the company's customers are provided with energy by Gas Plus Supply Limited and Electricity Plus Supply Limited. These companies are licensees and wholly owned subsidiaries in npower but the customers are serviced by Telecom Plus under their Utility Warehouse brand in accordance with a management services agreement between Telecom Plus and npower.
- 3.7 npower's published complaints handling arrangements comprise three documents covering residential, micro-business and Utility Warehouse customers and complaints handling is undertaken at several customer service centres throughout Britain.
- 3.8 Our review indicated that EDF Energy, E.ON UK and ScottishPower had set out their published complaints handling procedures in one document and operated from fewer customer service centres. British Gas had separate documents for residential and micro-business customers and two main customer service centres.
- 3.9 Four of the suppliers used only one main database system to record both residential and micro-business complaints. Two of the suppliers used one main system for residential complaints management but had several different systems in operation for micro-business complaints.
- 3.10 However, our review indicated that there was a consistent approach adopted by all suppliers to the key management controls over their complaints handling teams for residential and micro-business customers to ensure compliance with the new Regulations, which included:
- Staff training and procedures;
 - Call recording and listening;
 - Supervision and management through side by side observation; and
 - Review of management information produced by the various complaints management systems.

Preparations for the new Regulations

Staff training

- 3.11 In preparation for the introduction of the new Regulations on 1st October 2008, we noted that the suppliers had developed and rolled out a programme of training to all their customer facing staff and those with responsibility of complaints management.
- 3.12 Based on our review of the staff training materials provided to us by the suppliers we noted that key aspects of the training provided generally included:
- CEAR Act introduction, including Consumer Focus and Consumer Direct;

- Obligations to capture, record and report upon all complaints;
- Complaints definition;
- Identifying and logging complaints on the complaints management system;
- Signposting to published procedures and the redress scheme;
- Retrieving and recording repeat complaints; and
- Escalation.

System enhancements

- 3.13 As part of our data collection exercise we were provided with details of the work undertaken by the suppliers to review and update their systems in preparation for the implementation of the new Regulations on 1st October 2008. For one supplier this involved implementing an entirely new system. For the other suppliers an upgrade was considered to be sufficient to enhance the functionality of their systems to meet the requirements of the Regulations.
- 3.14 This work progressed alongside the revisions to the suppliers' published procedures and staff training provided to all customer service agents and managers.
- 3.15 Specific training was also provided for all relevant staff in the use of the various complaints management systems.

4 Detailed assessment against the Regulations

Introduction

- 4.1 As part of our review, we undertook a detailed assessment of the suppliers' published and operational procedures against the specific requirements of the Regulations. Our findings in respect of each aspect of the Regulations are set out below.

Definition of a complaint

Section 2.1

- 4.2 Section 2.1 of the Regulations defines a complaint as follows:
- 4.3 "Complaint" means any expression of dissatisfaction made to an organisation, related to any one or more of its products, its services or the manner in which it has dealt with any such expression of dissatisfaction, where a response is either provided by or on behalf of that organisation at the point at which contact is made or a response is explicitly or implicitly required or expected to be provided thereafter."

Findings

- 4.4 We noted that all the main GB energy suppliers applied this definition of a complaint consistently within their complaints handling procedures and practices and that the suppliers' complaints management procedures had been amended where necessary to require all dissatisfaction to be logged as a complaint.
- 4.5 Our review of the materials in relation to the staff training programmes undertaken by the suppliers before the new Regulations came into force indicated that these also included the definition as set out in the Regulations.
- 4.6 As part of our work we listened to a sample of live calls received by customer service staff during our site visits. The testing that we undertook indicated that customer service staff were aware of the requirements of the Regulations and dissatisfaction was being used to define whether a complaint was being made.
- 4.7 However, we noted that the number of complaints for the period provided to us by EDF Energy was considerably fewer than for the other main energy suppliers to such a degree that the data was out of step and could not be entirely due to an accurate lower level of complaints.
- 4.8 This is an area where it is particularly difficult to ensure consistency of approach between suppliers (and by their respective customer service centre staff).

- 4.9 There is an element of judgement involved on the part of the individuals who are handling contacts (even though we noted that extensive training was provided to staff by all the suppliers in relation to this matter) - especially in those cases where it is not necessarily self-evident that the customer is dissatisfied.

Regulated provider's complaints handling procedure (Regulation 3)

Section 3 (1-4)

- 4.10 A regulated provider must have in place at all times a complaints handling procedure.
- 4.11 Each regulated provider must comply with its complaints handling procedure in relation to each consumer complaint it receives.
- 4.12 Each regulated provider's complaints handling procedure must:
- be in plain and intelligible language;
 - allow for consumer complaints to be made orally (by telephone or in person at the regulated provider's business premises) or in writing (including by email);
 - allow for consumer complaints to be progressed through each stage of the complaints handling process orally (by telephone or in person at the regulated provider's business premises) or in writing (including by email);
 - describe the steps which the regulated provider will take with a view to investigating and resolving a consumer complaint and the likely timescales for each of those steps;
 - provide for an internal review of an existing consumer complaint where a complainant indicates that they would like such a review to occur because they are dissatisfied with the handling of that consumer complaint;
 - inform relevant consumers of the names and contact details of the main sources of independent help, advice and information that are available to them. For these purposes a source of help, advice and information shall be independent if it is independent of regulated providers, a qualified redress scheme and the Authority;
 - describe the relevant consumer's right to refer a consumer complaint to a qualifying redress scheme:
 - ❖ on and from the point at which the regulated provider notifies the relevant consumer in writing that it is unable to resolve the consumer complaint to the relevant consumer's satisfaction; and

- ❖ after the expiry of the specified time period; and
- set out the different remedies that may be available to a relevant consumer under the complaints handling procedure in respect of a consumer complaint, which remedies must include:
 - ❖ an apology;
 - ❖ an explanation;
 - ❖ the taking of appropriate remedial action by the regulated provider; and
 - ❖ the award of compensation in appropriate circumstances.

4.13 Those regulated providers who hold a licence under:

- section 7A(1) of the Gas Act 1986; or
- section 6(1)(d) of the Electricity Act 1989;
- must include in their complaints handling procedure as a remedy the award of compensation to domestic consumers, in appropriate cases, where the domestic consumer has been adversely affected by a failure of that regulated provider to comply with its obligations under, respectively, standard condition 25 (Marketing gas to domestic customers) of the Standard Conditions of the Gas Supply Licence or standard condition 25 (Marketing electricity to domestic customers) of the Standard Conditions of the Electricity Supply Licence.

Findings

4.14 We undertook a line by line review of each supplier's published complaints handling procedures to assess them against the specified requirements of the Regulations. We also compared them against the published procedures of the other main GB energy suppliers to benchmark approaches and to identify examples of best practice. The findings of our assessment of the published procedures are set out below.

4.15 We noted that the documents published by the main GB energy suppliers were clear and intelligible. Based on our review of the suppliers' internal procedures for complaints we noted that management controls had been designed with a view to ensuring that their customer service staff comply with the published procedures at all times.

4.16 Our review indicated that the published procedures were in all cases written in clear and intelligible language as required and provided their customers with the information necessary to complain and a step by step summary of the processes that the supplier would follow in handling their complaint.

4.17 We noted that all the suppliers' procedures included contact addresses, telephone numbers and email addresses for their complaints handling teams and provided for an internal investigation in the event that the customer remained dissatisfied. Details of the Energy Ombudsman redress scheme were also included in all the suppliers' published procedures. The areas where we noted departures from the Regulations are set out below.

Access

4.18 The Regulations stipulate that the suppliers must allow for consumer complaints to be made orally (by telephone or in person at the regulated provider's business premises) or in writing (including by email). Through our review of the suppliers' published procedures we noted that these anticipated that customer contact and the progression of complaints would be undertaken by telephone, by letter or by email. Although we understand that all the suppliers would seek to accommodate a customer who wished to have a face to face meeting to discuss their complaint, our review indicated that only one supplier had specifically provided contact addresses where customers could meet customer service staff in person at the supplier's business premises as required by the Regulations.

4.19 The Regulations require the suppliers to provide customers with details of the main sources of independent advice that are available to them. We noted that the published procedures for five of the suppliers listed the contact details for the following main sources of independent advice:

- Consumer Direct; and
- Energy Ombudsman.

4.20 Based on our benchmarking work we noted that the contact details of the Citizen's Advice Bureau were provided in one supplier's procedures. In our view this constitutes best practice.

Process

4.21 The published procedures of the suppliers generally involved a three step process:

MAIN GB ENERGY SUPPLIERS 3-STEP COMPLAINTS HANDLING PROCESS	
1.	Customer first contact through customer service centre staff
2.	Access to specialised complaints handling staff or manager if customer dissatisfied
3.	Access to senior manager/ internal investigation process if customer remains dissatisfied

4.22 Based on our review of the procedures we noted that steps 1 and 2 were available to customers through telephone contact - enabling them to pursue their complaint orally as stipulated in the Regulations. However, for five of the suppliers step 3 of the process required the customer to submit their complaint in writing for investigation and did not include provision for the continuation of the process orally through to this final stage.

4.23 The Regulations also require regulated providers to set out the likely timescales involved in investigating and resolving a consumer complaint. We noted that five suppliers specified timescales for dealing with complaints, whilst recognising that some matters require longer to resolve than others. A range of between five and ten working days was provided.

4.24 However, one supplier did not specify any timescales within their published procedures.

Remedy

4.25 Three suppliers described in detail the potential remedies that may be available to consumers following a full internal review of their complaints. These included:

- Apologising and explaining the findings to the customer;
- Taking appropriate action to put things right; and
- Explaining the next steps which may include compensation paid by the supplier.

4.26 In all of the published procedures that we reviewed, the consumer's rights to refer a complaint to the Energy Ombudsman were set out in the procedures, which state that consumers can bring their case to the Energy Ombudsman if their complaint remains unresolved after eight weeks or if the company has issued them with final response (deadlock) letter. In two cases the different remedies that the Energy Ombudsman may require the supplier to provide (such as a service of some practical action that will benefit the customer, an apology, or explanation or a financial award) were also set out in published procedures. In our view this constitutes best practice.

4.27 Five suppliers referred to the possible award of compensation if the customer complaint relates to the supplier's sales activities once a full investigation by the supplier had been completed as required.

Recording complaints upon receipt (Regulation 4)

Section 4 (1-6)

4.28 Upon receipt of a consumer complaint a regulated provider must record in a written, electronic format the following details:

- the date that the consumer complaint was received;

- whether the consumer complaint was made orally or in writing;
- the identity and contact details of the relevant consumer making the consumer complaint or on whose behalf the consumer complaint is made;
- where the regulated provider who receives the consumer complaint holds a licence under section 7A(1) of the Gas Act 1986 or under section 6(1)(d) of the Electricity Act 1989 or both, the account details of the relevant consumer making the consumer complaint or on whose behalf the consumer complaint is made;
- a summary of the consumer complaint;
- a summary of any advice given or action taken or agreed in relation to the consumer complaint;
- whether the consumer complaint has become a resolved complaint and, if so, the basis upon which the regulated provider considers that the consumer complaint is a resolved complaint; and
- the method for future communication (if any) that has been agreed with the complainant.

4.29 Where any subsequent contact is made with the regulated provider in relation to an existing consumer complaint that regulated provider must, upon receipt of that subsequent contact, record:

- the date of that contact;
- whether the subsequent contact was made orally or in writing;
- whether the complainant making the subsequent contact is the same complainant as, or different to, the complainant who made the original contact regarding an existing consumer complaint and, where different, the identity and contact details of the complainant making the subsequent contact;
- a summary of that contact;
- a summary of any advice given or action taken or agreed in response to any points raised in that contact;
- whether the consumer complaint has become a resolved complaint and, if so, the basis upon which the regulated provider considers that the consumer complaint is a resolved complaint; and
- the method for future communication (if any) that has been agreed with the complainant.

- 4.30 All details recorded in accordance with paragraph 2 (4.29 above) must be clearly linked to an existing consumer complaint.
- 4.31 For the purposes of paragraph 1 (4.28 above) and 2 (4.29 above) and Regulation 5 a consumer complaint or any subsequent contact shall be treated as having been received by a regulated provider:
- where the consumer complaint or subsequent contact is made orally (by telephone or in person at the regulated provider's business premises), at the time at which it is received by that regulated provider;
 - where the consumer complaint or subsequent contact is made in writing (including by email) and it is received before 1700 hours on a working day, on the working day that it is received by that regulated provider;
 - where the consumer complaint or subsequent contact is made in writing (including by email) and it is received by the regulated provider after 1700 hours on a working day or at any time on a day that is not a working day, on the first working day immediately following the day upon which it is received by that regulated provider.
- 4.32 Where a complainant claims to have made a consumer complaint in respect of a matter but it is not possible to identify a relevant existing consumer complaint, the regulated provider must record the fact that it is unable to trace the existing consumer complaint.
- 4.33 Where a regulated provider has recorded that a consumer complaint is a resolved complaint but subsequent contact from a complainant in relation to that consumer complaint indicates that it is not a resolved complaint, the regulated provider:
- Must record details of this change in the consumer complaint's status in its recording system;
 - Must as soon as reasonably practicable after becoming aware that the consumer complaint is not a resolved complaint:
 - ❖ Direct the complainant to the complaints handling procedure on its website; and
 - ❖ Offer to provide a copy of the complaints handling procedure to the complainant free of charge.
 - Must take account of that consumer complaint in any report which it is obliged to prepare and publish in accordance with Regulation 11; and
 - Shall not otherwise be entitled to treat that consumer complaint as a resolved complaint for the purposes of these Regulations until that consumer complaint is demonstrably a resolved consumer complaint.

Recording handling of complaints (Regulation 5)

Section 5 (1-2)

- 4.34 In addition to recording information in accordance with Regulation 4, each regulated provider must keep a written electronic record of the matters specified in paragraph 2 (4.35 below) for each consumer complaint which it receives where that consumer complaint has not become a resolved complaint by the end of the working day after the day on which the consumer complaint was first received by that regulated provider.
- 4.35 The matters which must be recorded in accordance with paragraph 1 (4.34 above) are:
- The steps the regulated provider has taken in response to each such consumer complaint, including any steps it has taken to resolve that consumer complaint;
 - The date (if any) upon which any such consumer complaint became a resolved consumer complaint;
 - The date (if any) upon which the specified time period expired; and
 - The date (if any) upon which the relevant consumer who made the consumer complaint or on whose behalf the consumer complaint was made, was informed of their right to refer that consumer complaint to a qualifying redress scheme in accordance with Regulation 6.3 (4.56 below).

Findings

- 4.36 We undertook the following review work to assess compliance with Regulations 4 and 5.
- 4.37 We reviewed the suppliers' internal complaints handling procedures, discussed these with management and walked through procedures on site to understand the key steps of the complaints recording process and the functionality of the various systems in use.
- 4.38 We then tested a sample of thirty pre-selected complaints for each supplier to confirm that the records required by the Regulations had been maintained.
- 4.39 We also listened to a sample of recorded and live calls to assess whether the requirements of the Regulations were being addressed. The findings of our work are set out below.
- 4.40 Our review of the internal complaints handling procedures and staff training materials indicated that when dissatisfaction has been noted, customer service staff are required to use the complaints handling database system to open a new complaint.
- 4.41 We noted that mandatory information needed to be recorded by the customer service staff managing the complaints as follows:

- Original complaint date (received date);
 - The means (e.g. telephone, letter, email etc.) of communication from the complainant;
 - The name and contact details of the relevant customer (or complainant if different);
 - A free text box in which a summary of the consumer complaint and ongoing discussions/ correspondence is to be recorded;
 - The method of future communication agreed with the complainant;
 - Free text boxes to log, date and summarise any advice given or action taken to resolve the complaint and to record the reasons why the complaint has been closed as resolved; and
 - Complaint status (open or closed).
- 4.42 Our review indicated that the system fields were consistent with the requirements of the Regulations for recording complaints upon receipt.
- 4.43 Where a complaint has previously been treated as resolved but further contact is received from the customer regarding the complaint, the suppliers' internal procedures required customer service advisers to reopen the complaint and to continue to log progress in managing the complaint in the previously established record and to direct the customer to the supplier's complaints handling procedures.
- 4.44 The specified fields and free text boxes should continue to be used to log the date of contact, the method of communication from the customer, whether the complainant remains the same individual (and any new contact details), a summary of the contact and any action taken by the customer service staff.
- 4.45 The field from the original complaint that is used to record the agreed method of future communication is to be amended should the subsequent contact suggest that this needs to be changed. Where the complaint has been resolved, a free text box should be used to record the reasons why the complaint has been closed as resolved.
- 4.46 In our view, these arrangements are consistent with the requirements of the Regulations. Our sample testing of complaints also indicated that the procedures were generally being followed by the suppliers' customer service staff.
- 4.47 For the sample of cases that we tested at all the suppliers, customer dissatisfaction was correctly being recorded as a complaint and customers were being sign-posted to the published complaints procedures and the redress scheme where required.

- 4.48 However, from our sample testing we noted that the free text summaries completed by customer service advisers to record the basis upon which they consider that the complaint has been resolved, varied in detail.
- 4.49 We would expect to see a clear link between the details of the complaint, the agreed action to be taken and the final conclusion that the matter has been resolved, including confirmation that the customer is satisfied that the action taken addresses their concerns.
- 4.50 It is important that this information is recorded accurately since the supplier is required to publish details of complaints that have not been resolved at the end of the next working day in accordance with the requirements of Regulation 11.
- 4.51 Our sample testing indicated that this was not always evident at all of the suppliers.
- 4.52 We also noted at two suppliers that departures from their own complaints handling procedures (and thereby Regulation 4) had arisen due to human error.
- 4.53 Examples of these departures included one instance of not recording a complaint that related to another energy supplier and four complaints that had been set up as new complaints instead of reopening the previous complaint.

Signposting consumers to the redress scheme if complaints cannot be resolved (Regulation 6)

Section 6 (1-3)

- 4.54 The regulated provider must send a relevant consumer a written notice informing that relevant consumer of the matters addressed at paragraph 2 (4.54 below) in the circumstances described at paragraph 3 (4.56 below).
- 4.55 A notice sent in accordance with paragraph 1 (4.54 above) must notify the relevant consumer:
- of their right to refer the consumer complaint to a qualifying redress scheme;
 - that the qualifying redress scheme process is independent of the regulated provider;
 - that the qualifying redress scheme process is free of charge to the relevant consumer and to any other category of complainant;
 - of the types of redress that may be available under a qualifying redress scheme; and
 - that any outcome of the qualifying redress scheme process is binding upon the regulated provider but not upon the relevant consumer or any other category of complainant.

- 4.56 A regulated provider must send a notice to a relevant consumer in accordance with paragraph 1 (4.54 above) on the earlier of:
- the first working day after the day (if any) upon which that regulated provider becomes aware that it is not able to resolve a consumer complaint to that relevant consumer's satisfaction; and
 - the date upon which the specified time period for that consumer complaint expires unless that date falls on a day that is not a working day, in which case the first working day thereafter.

Findings

- 4.57 We reviewed the suppliers' internal complaints handling procedures. We discussed these with management and walked through procedures on site to understand the key steps of the redress process, including pro-forma letters which were then assessed against the requirements of the Regulations.
- 4.58 Since our review was undertaken only a short time after the new Regulations came into force, we did not identify any cases where eight weeks had passed and the customer was entitled to redress to the Energy Ombudsman.
- 4.59 In addition, we only identified a small number of cases within our sample where deadlock had been reached. The findings of our work are set out below.
- 4.60 We noted that all customers were signposted to the redress scheme the back of all domestic and micro-business bills. Details of the scheme were also set out on the suppliers' websites and in their published complaints handling procedures. However, for one supplier we noted that some of the website content regarding the redress scheme related to the regulatory regime in operation before 1st October 2008 and still included references to *energywatch*.
- 4.61 For all suppliers, we noted that if a complaint cannot be resolved by the customer relations staff it is escalated to a Team Manager or a specialist complaints handler to assist the customer. Any complaint that is still open after 8 weeks or where deadlock has been reached the supplier notifies the customer of the steps they can take including the redress scheme by sending them a formal letter.
- 4.62 We noted that the pro-forma signposting or deadlock letters used by the suppliers clearly stated that the Energy Ombudsman service is independent and free of charge.
- 4.63 However, we noted for one of the suppliers the letters did not describe the various remedies available to customers including an apology, compensation or any other action as deemed necessary by the Energy Ombudsman and that the decision of the Ombudsman is binding on the supplier but not upon the customer as required by the Regulations.

Allocation and maintenance of adequate resources for complaints handling (Regulation 7)

Section 7 (1)

4.64 Each regulated provider must:

- receive, handle and process consumer complaints in an efficient and timely manner; and
- allocate and maintain such level of resources as may reasonably be required to enable that regulated provider to receive, handle and process consumer complaints in an efficient and timely manner and in accordance with these Regulations.

Findings

4.65 Before the on site visits were undertaken, we requested information from each supplier regarding the staff deployed towards complaints handling and the approach that they adopt to ensuring that sufficient staff remain available to respond to consumer complaints.

4.66 We also obtained details of the number of complaints received by each supplier during the first three weeks of the operation of the new Regulations (1st to 24th October 2008) since this was the only data available in relation to the new regulatory regime at the time of our review.

4.67 For the purposes of this review we relied upon the suppliers to provide us with accurate data regarding complaint numbers and accepted the data as unaudited.

4.68 We compared the number of complaints received by each supplier during that period against the published number of customers recorded on their websites and the data provided by the other main energy suppliers to assess whether the data for each supplier appeared to be a realistic basis for forecasting staffing requirements going forward.

4.69 We noted that the average ratio of complaints to the individual supplier's customer base was around 0.44%. In five cases the data provided to us appeared to be a realistic basis for forecasting the suppliers' staffing requirements.

4.70 However, the number of complaints for the period provided to us by one supplier was significantly lower than all of the other main GB energy suppliers and the ratio of complaints to their customer base was some way below the average ratio.

4.71 This may indicate that not all complaints are being recorded in accordance with the requirements of the Regulations and that the level of reported complaints may not be a reasonable basis for estimating the resources requirements for complaint handling for the company.

Section 12 and 13 complaints (Regulation 8)

Section 8 (1-2)

- 4.72 A regulated provider must, after discussion with the Council (Consumer Focus), put in place appropriate arrangements to deal effectively with section 12 and 13 complaints.
- 4.73 If the Council (Consumer Focus) refers a vulnerable consumer or a consumer complaint relating to a vulnerable consumer to a regulated provider, that regulated provider must take such additional steps as it considers necessary or appropriate with a view to, as appropriate, assisting that vulnerable consumer and resolving the relevant consumer complaint in an appropriate and prompt manner.

Findings

- 4.74 We reviewed the suppliers' internal procedures for working with Consumer Focus and handling complaints from vulnerable customers. We discussed these with management and walked through procedures on site to understand the key steps of the process, which were then assessed against the requirements of the Regulations.
- 4.75 Our pre-selected sample of 30 complaints included 3 Consumer Focus referrals for each supplier. The documentation and the steps taken by complaints handlers to resolve these referrals were reviewed during our on site visits. The findings of our work are set out below.
- 4.76 We noted that all the suppliers had agreed and put in place arrangements with Consumer Focus to handle referrals of vulnerable consumers and threatened or actual disconnections.
- 4.77 The process is that Consumer Focus should call or email a named contact within the team dedicated to handling Consumer Focus complaints. This enables Consumer Focus to bypass the customer service staff and to deal directly with more experienced complaints handlers and may include providing the customer with access to the relevant supplier's Priority Services scheme. The key contact is then responsible for resolving the complaint in accordance with the supplier's complaints and escalation procedures, including keeping Consumer Focus informed of progress. Our sample testing indicated that the suppliers were following the approaches that they had agreed with Consumer Focus.
- 4.78 The CEAR Act 2007 definition of a vulnerable customer is that "a consumer shall be regarded as vulnerable where the Council (Consumer Focus) is satisfied that it is not reasonable to expect that person to pursue the complaint on that person's own behalf."
- 4.79 All the suppliers had specialist staff to assist and provide support to customers who are identified as vulnerable or who have applied for priority services. We were advised that customer service staff have been provided with training to refer such customers to the specialist staff where appropriate.

Referral of consumers from Consumer Direct (Regulation 9)

Section 9 (1-2)

- 4.80 Each regulated provider must, after discussion with Consumer Direct, put in place appropriate arrangements to deal effectively with referrals to it from Consumer Direct of consumer complaints and, if appropriate, complainants.
- 4.81 The arrangements as required by paragraph 1 (4.80 above) must set out a process by which Consumer Direct may make such referrals to the regulated provider.

Findings

- 4.82 We reviewed the suppliers' internal procedures for working with Consumer Direct and discussed these with management. We walked through the procedures on site to understand the key steps of the process, which were then assessed against the requirements of the Regulations.
- 4.83 Our pre-selected sample of thirty complaints for each supplier included five Consumer Direct referrals. The documentation and the steps taken by complaints handlers to resolve these referrals were reviewed during our on site visits. The findings of our work are set out below.
- 4.84 We noted that all the suppliers had agreed and put in place arrangements with Consumer Direct to handle referrals. The process agreed is that Consumer Direct should call or email a named contact within the team dedicated to handling Consumer Direct correspondence. The named contact is then responsible for resolving the complaint in accordance with the company's complaints and escalation procedures.
- 4.85 Our sample testing indicated that the agreed approach with Consumer Direct was being followed.

Information to be provided to consumers (Regulation 10)

Section 10 (1-4)

- 4.86 Each regulated provider must ensure that its complaints handling procedure appears at a clear and prominent location on its website.
- 4.87 Where a consumer complaint has not become a resolved complaint by the end of the first working day after the day the consumer complaint was first received by a regulated provider, the regulated provider must as soon as reasonably practicable (unless it has already done so in respect of the relevant consumer complaint):
- direct the complainant to the complaints handling procedure on its website; and

- offer to provide a copy of the complaints handling procedure to the complainant free of charge.

4.88 Each regulated provider must, at least once in every twelve-month period, inform all of its domestic consumers (or arrange for all of its domestic consumers to be informed) of the existence of its complaints handling procedure and how a relevant consumer may obtain a copy of it.

4.89 A regulated provider must provide a copy of its complaints handling procedure, free of charge, to any person who requests a copy.

Findings

4.90 We reviewed the suppliers' websites and sought to obtain a copy of their published complaints handling procedures. We also reviewed their internal procedures and training materials for signposting the published procedures when a customer complaint cannot be resolved by the end of the next working day following the day of receipt.

4.91 We discussed these arrangements with management on site to understand the key steps of the process, which were then assessed against the requirements of the Regulations.

4.92 Using our pre-selected sample of thirty complaints for each supplier we reviewed the documentation available to assess whether customers had indeed been signposted to the published complaints handling procedures.

4.93 We also listened to a sample of live and recorded calls to assess whether the complaints handlers were signposting the customer to the procedures when they identified that the complaint could not be immediately resolved.

4.94 The findings of our work are set out below.

4.95 We noted that the published complaints handling procedures were available from the suppliers' websites and located in a prominent position. The procedures were also signposted on the back of bills issued to customers.

4.96 However, for one supplier some of the published procedures located on the website referred to the regulatory regime before the new Regulations came into force, although up to date procedures were published elsewhere on the website.

4.97 The suppliers' internal procedures all required customers whose complaint has not been immediately resolved to be offered:

- directions to the complaints handling procedures on the company website; or
- a paper copy of the complaints procedures free of charge.

- 4.98 Our sample testing indicated that in most cases customers had been signposted to the suppliers' complaints handling procedure, as soon as reasonably practicable, or sent a copy of the complaints handling procedures, where the matter could not be resolved at the end of the next working day following receipt of the complaint.
- 4.99 However, we identified two examples through our sample testing at one supplier where the customer had not been signposted to the complaints handling procedures until some time (in one case three weeks) had passed after the complaint was received.

Publication of information on complaints (Regulation 11)

Section 11 (1-2)

- 4.100 Regulated providers who hold a licence under section 7A (1) of the Gas Act 1986 or a licence under section 6 (1) (d) of the Electricity Act 1989 or both must:
- Publish annually a consumer complaints report in a prominent location on their website; and
 - Provide a copy of their consumer complaints report, free of charge, to any person who requests a copy.
- 4.101 A consumer complaints report is a report in relation to the twelve month period ending with the month immediately preceding the month in which the report is published which contains the following information:
- The number of consumer complaints which the regulated provider received from domestic consumers during that period which had not become resolved complaints by the end of the first working day after the day the consumer complaint was first received by the regulated provider;
 - That the regulated provider has a complaints handling procedure;
 - How a copy of that procedure may be obtained;
 - The existence of these Regulations; and
 - How and from where a copy (including a hard copy) of these Regulations may be obtained.

Findings

- 4.102 As part of our review, we requested information from each supplier on the steps that it was taking to meet the reporting requirements of the Regulations.

- 4.103 We then reviewed the data provided and compared the approaches adopted by all six suppliers. The findings of our work are set out below.
- 4.104 At the time of our review, all the suppliers were still developing their arrangements to address the annual reporting requirement. As of October 2009, the suppliers planned to publish an annual report in line with the required standards.
- 4.105 This will provide data from 1st October 2008 to September 2009 and will be published in accordance with the timetable set out in the Regulations and will be available to all customers via the suppliers' websites by the end of October 2009.
- 4.106 Nevertheless, the annual reporting arrangements for all the six main GB energy suppliers have still to be finalised.

5 Areas for further development by the main GB energy suppliers

Our review work indicated that overall all the main GB energy suppliers were compliant with the Regulations. However, we noted a number of areas where there is scope for improving their arrangements. These are set out in the following pages of this Section.

REGULATION	DEVELOPMENT REQUIRED	NO. OF SUPPLIERS	MANDATORY	BEST PRACTICE
Regulated provider's complaints handling procedure (Regulation 3)	Published complaints handling procedures to be updated to include the specific addresses of business premises where customers may visit should they wish to discuss their complaint face to face or a telephone contact number where they can obtain details of the most convenient site for them to visit.	5	✓	
	Complaints handling procedures to be updated to include the opportunity for customers to continue their complaint orally through each stage of the complaints handling process.	5	✓	
	Contact details of the Citizen's Advice Bureau as main independent advisers to be included in the suppliers' published complaints handling procedures.	5		✓
	Published complaints handling procedures to be amended to include the likely timescales involved in investigating and resolving a consumer's complaint.	1	✓	

REGULATION	DEVELOPMENT REQUIRED	NO. OF SUPPLIERS	MANDATORY	BEST PRACTICE
Regulated provider's complaints handling procedure (Regulation 3)	Published complaints handling procedures to include full details of the remedies that the Energy Ombudsman may require the supplier to provide.	4	✓	
	Complaints handling procedures to include the likely outcomes following an internal investigation of a consumer complaint, including compensation.	3		✓
	Complaints handling procedures to include full details of the possible award of compensation if the customer complaint relates to the supplier's sales activities.	1	✓	
Recording complaints upon receipt (Regulation 4)	Management to undertake further checks over the coming months on the work of the supplier's customer service staff to ensure that any follow up contact from customers is not recorded as a new complaint in error.	1	✓	
	Customer service staff to be reminded of the need to record all complaints on the complaints handling system to ensure that there is a clear trail of any action taken to resolve the matter.	1	✓	

REGULATION	DEVELOPMENT REQUIRED	NO. OF SUPPLIERS	MANDATORY	BEST PRACTICE
Recording handling of complaints (Regulation 5)	Further guidance to be provided by suppliers to their customer service staff regarding the need to record clearly the basis upon which they consider the matter has been resolved in the closure summary and to ensure that the matter has indeed been resolved before closing the complaint on the relevant complaints management system.	6	✓	
Signposting consumers to the redress scheme if complaints cannot be resolved (Regulation 6)	Up to date details of the redress scheme to be placed in a prominent position on the website.	1	✓	
	Amendments to be made to the deadlock letters that are currently in use to include a description of the various remedies available and to highlight that the decision of the Ombudsman is binding on the supplier but not upon the customer.	1	✓	
Allocation and maintenance of adequate resources for complaints handling (Regulation 7)	Management to review the level of reported complaints to confirm that the supplier is recording all complaints in accordance with the requirements of the Regulations.	1	✓	

REGULATION	DEVELOPMENT REQUIRED	NO. OF SUPPLIERS	MANDATORY	BEST PRACTICE
Information to be provided to consumers (Regulation 10)	Customer relations staff to be reminded of the requirement to signpost customers to the complaints handling procedures as soon as is reasonably practicable if their complaint cannot be resolved at the end of the next working day following the receipt of the complaint.	1	✓	
	An up to date copy of the supplier's complaints handling procedures to be placed in a prominent position on the website and the out of date website content be removed.	1	✓	
Publication of information on complaints (Regulation 11)	Finalisation of the arrangements for meeting the annual reporting requirements of the Regulations by October 2009.	6		✓

6 Detailed methodology

Objectives

6.1 The objectives of the review of the six main GB energy suppliers specified by Ofgem were to:

- identify whether, and to what extent, the complaints handling standards have been embedded into gas and electricity suppliers' complaints handling procedures;
- identify areas of weakness in suppliers complaints handling processes;
- identify differences between suppliers in interpretation of the requirements of the complaints handling standards; and
- identify areas of good practice in the application of the complaints handling standards.

6.2 Following detailed discussions with Ofgem we agreed the following approach to addressing the above objectives. The approach involved two principal stages:

Stage 1- Data collection

6.3 Stage 1 involved a data collection exercise. For each supplier we requested information regarding their complaints management arrangements including:

- staff numbers deployed towards complaints handling;
- customer service centres locations;
- management structures; and
- the steps that they had taken to embed the new Regulations. These steps included revisions to their procedures, staff training and system changes.

6.4 We also collected a list of complaints that they had received between 1st October and 24th October 2008 and their forecast number of complaints for the full year to September 2009. For the purposes of this review we relied upon the suppliers to provide us with accurate data regarding complaint numbers and accepted the data as unaudited.

6.5 This enabled us to form a view of the preparations undertaken by the suppliers to embed the standards within their complaints handling procedures. The findings of this aspect of our work are set out in Section 3 of this report. We also collected the core documents in relation to complaints management, including the suppliers' published complaints management procedures, redress procedures and internal staff procedures for recording and processing complaints.

6.6 We then undertook a line by line assessment of the suppliers' published complaints handling procedures against the specific requirements of the Regulations and also assessed the arrangements in place at each supplier to ensure that the resources deployed towards complaints handling remained sufficient. The findings of this aspect of our work are set out in the relevant paragraphs of Section 4 of this report.

Stage 2- Visits to suppliers

6.7 Stage 2 involved visiting the six suppliers. For each supplier we spent two days on site. For those suppliers where residential and micro-business customer complaints were handled at separate sites we spent one day at each location. Some of the suppliers have several customer service centres and it was not possible to visit all of these within the timeframe specified for this project. In these cases our findings were based upon the results of a visit to a sample of sites that were selected to ensure representative coverage of residential and micro-business complaints handling by the suppliers.

6.8 The approach adopted comprised a mixture of walk through testing of the key system steps and sample testing. The sample testing was based upon a pre-selected sample of thirty complaints for each supplier selected from the list of complaints provided to us as part of the data collection exercise. The sample was stratified to include a representative sample of residential, micro-business, Consumer Focus and Consumer Direct complaints broadly in proportion to the complaint volumes for the supplier. We also listened to a sample of recorded and live calls for each supplier.

6.9 The findings of this aspect of our work are set out in the relevant paragraphs of Section 4 of this report. Our on site testing work is summarised below.

TEST PROGRAMME	SAMPLE SIZE FOR EACH SUPPLIER	OBJECTIVES
Walk through testing	100% of all key system steps	<p>Validation of internal procedure documentation provided to us during the data collection exercise</p> <p>Enhancing our understanding of how procedures were operating in practice</p> <p>Assessment as to how these procedures addressed the requirements of the Regulations in practice</p>

TEST PROGRAMME	SAMPLE SIZE FOR EACH SUPPLIER	OBJECTIVES
Pre-selected sample testing	17 residential complaints 3 Consumer Focus Complaints 5 Consumer Direct complaints 5 micro-business complaints	To assess whether procedures were being followed in accordance with the Regulations for: <ul style="list-style-type: none"> • Recording and logging complaints; • Signposting the complaints handling procedures; • Signposting the redress scheme; • Handling Section 12 & 13 complaints; and • Handling Consumer Direct complaints.
Call listening testing	30 recorded and live calls	To assess whether procedures were being followed in accordance with the Regulations for: <ul style="list-style-type: none"> • Use of consistent definition of complaint; • Recording and logging complaints; • Signposting the complaints handling procedures; and • Any other aspects of the Regulations relevant to the call.

Factual Clearance

- 6.10 At the end of the on site testing, a clearance meeting was held with management to confirm the factual accuracy of the evidence that we collected during our visit.

- 6.11 This was then followed up by a detailed review of the working papers collected and test results and a consistency check of the findings across all the main suppliers.
- 6.12 A separate report was prepared for each of the main GB energy suppliers. These reports included recommended improvements to the arrangements in place at each supplier. As agreed with Ofgem, the reports were issued in draft in the first instance to enable the factual accuracy of our findings to be confirmed through the discussion and finalisation of the reports with the individual energy suppliers before the issue of this consolidated report.

Consultation

- 6.13 In devising the above methodology we consulted with the various consumer representative bodies. This was undertaken in questionnaire form and enabled us to obtain their views on the audit and best practice review and the approach to be followed. The bodies that were involved in the consultation process included:
- Age Concern;
 - Citizens Advice Bureau;
 - Citizens Advice Scotland;
 - Consumer Direct;
 - Consumer Focus; and
 - Energy Ombudsman.