
Complaints handling agreed upon procedures report

Telecom Plus PLC

(trading as Utility Warehouse)

Final

20 January 2017



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1. *Background, Scope and Approach*

1.1. *Background*

In September 2016, Telecom Plus PLC (trading as Utility Warehouse, hereafter referred to as 'Utility Warehouse') received an open letter from Ofgem following the results of their latest consumer research report into customers' satisfaction with suppliers' complaints handling.

In the report Ofgem stated that there had been a rise in customer dissatisfaction (customers reporting they are "very dissatisfied"), of 7% and 11% for domestic and microbusiness consumers respectively. Overall, as a group, the medium-sized suppliers' performance resulted in 63% of their domestic customers surveyed saying that they were planning to, were in the process of, or had switched away as a result of their complaint handling experience.

For the first time, Ofgem disaggregated the results for medium-sized suppliers, **showing that 53% of the Utility Warehouse customers surveyed said they were very dissatisfied with how their complaint was handled.**

The results indicated that, of all of the energy suppliers surveyed, Utility Warehouse had the largest percentage of consumers believing the complaint was still open, whilst it had been flagged as closed. Furthermore, the results indicated that there were issues throughout the complaints process, from registration of the complaint through to resolution. Compared to the industry average, significantly more of Utility Warehouse's consumers surveyed:

- Said that Utility Warehouse did not specify how long each step of the process would take;
- Reported that Utility Warehouse did not regularly update them on the complaint's progress; and/or
- Said they were not informed that they could seek independent advice.

Utility Warehouse was asked by Ofgem to undertake an independent audit of their existing complaints handling process, with the results published by the end of 2016.

1.2. *Terms of reference*

Utility Warehouse engaged PwC ('PricewaterhouseCoopers LLP') to perform a set of 'Agreed upon procedures' in respect of their complaints handling performance for the purpose of fulfilling the requirement from Ofgem for an independent review. These procedures were agreed with Utility Warehouse and have been performed in accordance with the International Standard on Related Services ('ISRS') 4400 'Engagements to perform agreed-upon procedures regarding financial information'.

The work covered the handling processes for Utility Warehouse's domestic customer complaints that have been closed since January 2016. The procedures were drafted taking into account the following requirements and sources of information:

1. 'The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008';
2. The 'Standards of Conduct';
3. The open letter and summary report sent to Utility Warehouse by Ofgem that sets out the findings of the research carried out by Quadrangle in February – April 2016; and
4. PwC's Complaints Handling Assessment Framework (covering Policy, Process and Systems, Employee conduct, Monitoring and Governance).

1.3. Agreed upon procedures

We have performed the procedures agreed with Utility Warehouse and listed below on their complaints handling performance data, policies, processes and control environment. The results of our work, having performed these procedures are documented from **page 8**. These procedures were designed in line with our experience of similar assessments and are aligned with key elements of the 2008 Complaints Handling Regulations (‘CHR’) and SoC. Broadly, procedures 2 to 6 and 8 map to areas of the CHR. Procedures 2, 4, 7 and 8 map to areas of the SOC.

Limitations of our work

Our procedures, as stated in our agreement with Utility Warehouse dated **14 November 2016**, did not constitute an examination made in accordance with generally accepted auditing standards, the objective of which would be the expression of assurance on the effectiveness of the company’s complaints handling response. We do not express such assurance. Had we performed additional procedures or had we performed an audit or review of the the company’s complaints handling response in accordance with generally accepted auditing standards, other matters might have come to our attention that we would have reported to you. This report relates only to the company’s complaints handling performance data, policies, processes and control environment and does not extend to any financial statements of the company taken as a whole.

#	Proposed procedure
Complaints handling performance data	
1	<p>Obtain a listing of complaints cases that have been recorded on the Utility Warehouse complaints handling system over the period from January to November 2016. Using our own data analysis techniques and tools, independently categorise this data to:</p> <ul style="list-style-type: none"> - Identify the overall numbers of complaints by product / type of account, age of the complaint / time to resolve, root cause category, stage of complaint; and - Identify potential data quality anomalies that may require follow-up by Utility Warehouse, such as where case records / fields are potentially incomplete or erroneous. <p>We will report this data graphically and use this population to select the sample of 55 resolved cases for further testing (see procedure 5 below).</p>
Policies	
2	<p>Inspect the Utility Warehouse Complaints Handling Policy to check that it includes policies on:</p> <ul style="list-style-type: none"> - How the company defines, captures and actions ‘Expressions of Dissatisfaction’ (‘EODs’) / complaints; - How an EOD or complaint can be expected to be processed, the customer interaction in this process and the communication that the customer can expect; - How the company defines a resolved complaint and the customer’s involvement in this; - Dealing with repeat or re-opened complaints cases; and - Explanation of the deadlock process, 8 week communication and sign-posting to the Ombudsman. <p>We will report any exceptions that we identify.</p>
3	<p>Inspect the Utility Warehouse website and confirm by inspection that:</p> <ul style="list-style-type: none"> - The latest approved version of the Complaints Handling Policy is present on the website; - The policy is sign-posted from the homepage and is navigable to in ‘one click’; - Supporting information is provided regarding the methods of contact to enable a customer to register an EOD or complaint; and - The management team responsible for managing complaints is identified. <p>We will report any exceptions that we identify.</p>

Processes and workflows	
4	<p>Walkthrough and understand the process followed by Utility Warehouse to capture, assess and resolve customer complaints. For each main class of complaint (resolved at 1st line, resolved by 2nd line dedicated member resolution team, and executive teams including Ombudsman cases), follow one resolved case from ‘cradle to grave’ to ensure thorough inspection that:</p> <ul style="list-style-type: none"> - There are documented work instructions available to Utility Warehouse staff; - A single accountable member of staff is identified / assigned to manage the complaint; - The CHP system supports complaints processing with data validation controls, embedded work flows and, where appropriate, prompts for communication; - The agents identify the underlying root causes of the complaint, rather than the symptoms; - The agents keep appropriate records of the contact and the actions agreed with the customer for resolution; and - Actions are clearly handed-off to other teams within Utility Warehouse and how these are tracked to delivery. <p>We will report any exceptions that we identify.</p>
5.	<p>Based on the data set analysed in procedure 1, we will randomly select a sample of 55 cases that have been resolved and documented within the CHP system in the period spanning from January to November 2016.</p> <p>For this sample of 55 cases, we will report exceptions against the following test questions based on documentation of the case and call records:</p> <ol style="list-style-type: none"> 1. Does the agent ask three data protection questions? 2. Does the agent demonstrate to the customer that they have listened and understood their complaint? 3. Does the agent speak in a polite tone and flex their style according to the customer's tone? 4. Does the agent speak clearly without jargon? 5. Does the agent recognise that the customer has expressed dissatisfaction? 6. Did the agent correctly identify the root cause, or where insufficient information is available, did the agent correctly identify the next required action? 7. Does the agent agree the action to be taken? 8. Does the agent confirm and agree the expected timeframe needed to resolve the issue? 9. Does the agent confirm that they will respond to the customer and when? 10. Is there evidence that the agent followed up as promised? 11. Does the agent provide the customer with factually accurate information? 12. Does the customer only deal with one agent? 13. For complaints over 1 day +1 does the agent advise the customer on the complaints handling policy on the website or offer to send / is the complaints handling policy sent to the customer? 14. Does the agent confirm with the customer that the complaint has been resolved to their satisfaction? 15. Is there evidence that the customer has been signposted to the redress scheme (Ombudsman) where their complaint has not been resolved within 8 weeks or they do not accept the resolution offered? 16. Does the case record match the customer contact and conversation? 17. Where applicable a 14 day review / 28 day review have been performed? 18. Where applicable, an 8 week letter has been sent? 19. Are all required actions completed before the complaint is closed as resolved? <p>Was the complaint recorded on the correct start date?</p>

Control environment over complaints handling processes	
6.	<p>Through inspection of management’s documented complaints handling policy and procedures and interview based enquiry, determine that the following elements of oversight and accountability are in place:</p> <ul style="list-style-type: none"> – Clear accountability for complaints handling is identified from the senior management downwards; – Management information provides clear oversight of the complaints handling performance and further actions to be taken are documented and tracked in order to improve either the execution of this process or to remediate common root causes; – The breadth of the management information provides a ‘360 degree’ view (for example compliance monitoring results / performance is reported, complaints volumes are triangulated with broader customer satisfaction surveys and known operational issues) and; – Complaints information is used proactively as a source of continual improvement and actions are proactively integrated into customer service improvements. <p>We will report any exceptions that we identify.</p>
7.	<p>Determine whether coaching, quality assurance and compliance monitoring has been put in place over the complaints handling process, through inspection of:</p> <ul style="list-style-type: none"> – Routine team manager coaching and support to first and second line complaints handling teams; – The level of formal ‘2nd Line’ compliance monitoring that is performed and how relevant learning is captured and recycled into the organisation; – The linkage to performance management and training cycles; and – The extent that the 2008 Complaints Handling Standard and the Standards of Conduct are reviewed or assessed in the execution of the compliance monitoring. <p>We will report any exceptions that we identify.</p>
8.	<p>Inspect evidence that 1st and 2nd line agent training and communication covers the following factors:</p> <ul style="list-style-type: none"> – Key ‘must haves’ from the 2008 Complaints Handling Standards, which are the EOD definition, meeting the definition of a resolved complaint, issuance of 8 week letters and documentation standards; – The overall behaviours that are expected from the Standards of Conduct (‘SoC’); – Key learnings that would address factors in the recent market survey and 2016 Key Drivers Analysis (‘KDA’); – Overall knowledge of the end-to-end complaints handling process and how this should be explained to customers; and – Known points of failure / common root causes and the action required to quickly resolve these for customers. <p>We will report any exceptions that we identify.</p>

1.4. Approach

In executing the above procedures, we performed the following activity:

- Met with management to discuss the five elements of the PwC assessment framework (Policy, Process and Systems, Employee conduct, Monitoring and Governance);
- Performed a desktop review of Utility Warehouse’s key policy and procedure documentation;
- Performed a walkthrough of the end-to-end journey of a complaint, based on the categories of:
 - Resolved at 1st line (Helpdesk team);
 - Resolved by the member resolution team (or ‘MRT’);
 - Executive complaints; and
 - Ombudsman complaints.

- Using the sampling methodology set out in 1.5, **we selected a sample of 55 resolved cases from complaints closed in the period spanning from January to November 2016.** For each of the 55 resolved cases, we reviewed the case records (advisor notes and complaint logs) held and listened to the relevant customer calls that had been recorded by Utility Warehouse;
- Performed a desktop review of the company's relevant complaints performance reporting, training materials and quality assurance outputs; and
- Interviewed key personnel including members of Compliance, Training, Resolution Centre and Quality Assurance.

1.5 Sampling Methodology

The sample size for testing of resolved complaints, as agreed with management, is based on statistical sampling and providing a high level of confidence. All samples have been selected following a haphazard or random selection method, as detailed below:

- ***Haphazard selection:*** Sample items are selected without any conscious bias, i.e. without any special reason for including or omitting items from the sample; and
- ***Random selection:*** This method allows for all items in the population to have an equal chance of being selected. To select randomly, we use random number tables or generators, or random selection offered by sampling software or Microsoft Excel.

2. Results

2.1. Summary results against the agreed upon procedures

Below we document the results of the procedures we have executed at Utility Warehouse and the key exceptions resulting.

#	Proposed procedure	Result
Complaints handling performance data		
1	<p>Obtain a listing of complaints cases that have been recorded on the Utility Warehouse complaints handling system over the period from January to November 2016. Using our own data analysis techniques and tools, independently categorise this data to:</p> <ul style="list-style-type: none"> - Identify the overall numbers of complaints by product / type of account, age of the complaint / time to resolve, root cause category, stage of complaint; and - Identify potential data quality anomalies that may require follow-up by Utility Warehouse, such as where case records / fields are potentially incomplete or erroneous. <p>We will report this data graphically and use this population to select the sample of 55 resolved cases for further testing (see procedure 5 below).</p>	<p>The results of this analysis is documented in Appendix 1 (page 14).</p> <p>We made the following key observation:</p> <ul style="list-style-type: none"> • The average resolution time for closed complaints has increased from 3.58 days (complaints closed in January 2016) to 7.83 days (complaints closed in October 2016, with the average resolution time for the period being 5.89 days.
Policies		
2	<p>Inspect the Utility Warehouse Complaints Handling Policy to check that it includes policies on:</p> <ul style="list-style-type: none"> - How the company defines, captures and actions ‘Expressions of Dissatisfaction’ (‘EODs’) / complaints; - How an EOD or complaint can be expected to be processed, the customer interaction in this process and the communication that the customer can expect; - How the company defines a resolved complaint and the customer’s involvement in this; - Dealing with repeat or re-opened complaints cases; and - Explanation of the deadlock process, 8 week communication and sign-posting to the Ombudsman. <p>We will report any exceptions that we identify.</p>	<p>The following exceptions were noted:</p> <ul style="list-style-type: none"> • The complaints policy, as presented on the website, does not define an expression of dissatisfaction and when this can be closed as resolved. A “resolved complaint” is defined in the Complaints Handling Standards (2008) as ‘a consumer complaint in respect of which there remains no outstanding action to be taken by the regulated provider and which has been resolved to the satisfaction of the relevant consumer’. • The complaints policy does not define how to deal with repeat or re-opened complaints cases.

#	Proposed procedure	Result
3	<p>Inspect the Utility Warehouse website and confirm by inspection that:</p> <ul style="list-style-type: none"> - The latest approved version of the Complaints Handling Policy is present on the website; - The policy is sign-posted from the homepage and is navigable to in ‘one click’; - Supporting information is provided regarding the methods of contact to enable a customer to register an EOD or complaint; and - The management team responsible for managing complaints is identified. <p>We will report any exceptions that we identify.</p>	<p>No exceptions noted.</p>
Processes and workflows		
4	<p>Walkthrough and understand the process followed by Utility Warehouse to capture, assess and resolve customer complaints. For each main class of complaint (resolved at 1st line, resolved by 2nd line dedicated member resolution team, and executive teams including Ombudsman cases), follow one resolved case from ‘cradle to grave’ to ensure through inspection that:</p> <ul style="list-style-type: none"> - There are documented work instructions available to Utility Warehouse staff; - A single accountable member of staff is identified / assigned to manage the complaint; - The CHP system supports complaints processing with data validation controls, embedded work flows and, where appropriate, prompts for communication; - The agents identify the underlying root causes of the complaint, rather than the symptoms; - The agents keep appropriate records of the contact and the actions agreed with the customer for resolution; and - Actions are clearly handed-off to other teams within Utility Warehouse and how these are tracked to delivery. <p>We will report any exceptions that we identify.</p>	<p>The following exception was noted:</p> <p>For the walkthrough performed for the Helpdesk / 1st line case, it was noted that the complaint reviewed was closed on the call during the 1st line contact. However, it was noted that the actions required to address the complaint were performed only at a later stage. This suggests the complaint should have been closed at a later date, after all actions had been completed (and therefore in line with the definition of a resolved complaint in the 2008 Complaints Handling Standard).</p>

#	Proposed procedure	Result
5.	<p>Based on the data set analysed in procedure 1, we will randomly select a sample of 55 cases that have been resolved and documented within the CHP system in the period spanning from January to November 2016.</p> <p>For this sample of 55 cases, we will report exceptions against the following test questions based on documentation of the case and call records:</p> <ol style="list-style-type: none"> 1. Does the agent ask three data protection questions? 2. Does the agent demonstrate to the customer that they have listened and understood their complaint? 3. Does the agent speak in a polite tone and flex their style according to the customer's tone? 4. Does the agent speak clearly without jargon? 5. Does the agent recognise that the customer has expressed dissatisfaction? 6. Did the agent correctly identify the root cause, or where insufficient information is available, did the agent correctly identify the next required action? 7. Does the agent agree the action to be taken? 8. Does the agent confirm and agree the expected timeframe needed to resolve the issue? 9. Does the agent confirm that they will respond to the customer and when? 10. Is there evidence that the agent followed up as promised? 11. Does the agent provide the customer with factually accurate information? 12. Does the customer only deal with one agent? 13. For complaints over 1 day +1 does the agent advise the customer on the complaints handling policy on the website or offer to send / is the complaints handling policy sent to the customer? 14. Does the agent confirm with the customer that the complaint has been resolved to their satisfaction? 15. Is there evidence that the customer has been signposted to the redress scheme (Ombudsman) where their complaint has not been resolved within 8 weeks or they do not accept the resolution offered? 16. Does the case record match the customer contact and conversation? 17. Where applicable a 14 day review / 28 day review have been performed? 18. Where applicable, an 8 week letter has been sent? 19. Are all required actions completed before the complaint is closed as resolved? 20. Was the complaint recorded on the correct start date? 	<p>The following exceptions were noted:</p> <ol style="list-style-type: none"> 1. No exceptions noted. 2. 2 exceptions noted. 3. 3 exceptions noted. 4. 2 exceptions noted. 5. 2 exceptions noted. 6. No exceptions noted. 7. No exceptions noted. 8. 10 exceptions noted. 9. 8 exceptions noted. 10. 5 exceptions noted. 11. 1 exception noted. 12. 13 exceptions noted*. 13. No exceptions noted. 14. 24 exceptions noted. 15. No exceptions noted. 16. 3 exceptions noted. 17. No exceptions noted. 18. No exceptions noted. 19. 7 exceptions noted. 20. No exceptions noted. <p><i>Also note that for 4 complaints selected for testing no recorded evidence could be retrieved and as such, the above results do not include these items.</i></p> <p><i>In addition to the above exceptions, it was also noted that:</i></p> <ul style="list-style-type: none"> - 1 Complaint was logged as a complaint made by phone but should have been raised as an email complaint. - 1 Complaint appears to have been open for over 132 days but this is due to a human error as the complaint was accidentally re-opened instead of creating a new complaint relating to the same customer. - 1 Complaint should have not been raised - this was a very simple query that was resolved within 1 minute: a customer received a late payment letter and thought this was sent after he had made the payment but this was not the case. <p><i>*Includes also complaints that were escalated / transferred to other teams.</i></p>

#	Proposed procedure	Result
<i>Control environment over complaints handling processes</i>		
6.	<p>Through inspection of management’s documented complaints handling policy and procedures and interview based enquiry, determine that the following elements of oversight and accountability are in place:</p> <ul style="list-style-type: none"> - Clear accountability for complaints handling is identified from the senior management downwards; - Management information provides clear oversight of the complaints handling performance and further actions to be taken are documented and tracked in order to improve either the execution of this process or to remediate common root causes; - The breadth of the management information provides a ‘360 degree’ view (for example compliance monitoring results / performance is reported, complaints volumes are triangulated with broader customer satisfaction surveys and known operational issues) and; - Complaints information is used proactively as a source of continual improvement and actions are proactively integrated into customer service improvements. <p>We will report any exceptions that we identify.</p>	No exceptions noted.
7.	<p>Determine whether coaching, quality assurance and compliance monitoring has been put in place over the complaints handling process, through inspection of:</p> <ul style="list-style-type: none"> - Routine team manager coaching and support to first and second line complaints handling teams; - The level of formal ‘2nd Line’ compliance monitoring that is performed and how relevant learning is captured and recycled into the organisation; - The linkage to performance management and training cycles; and - The extent that the 2008 Complaints Handling Standard and the Standards of Conduct are reviewed or assessed in the execution of the compliance monitoring. <p>We will report any exceptions that we identify.</p>	No exceptions noted.

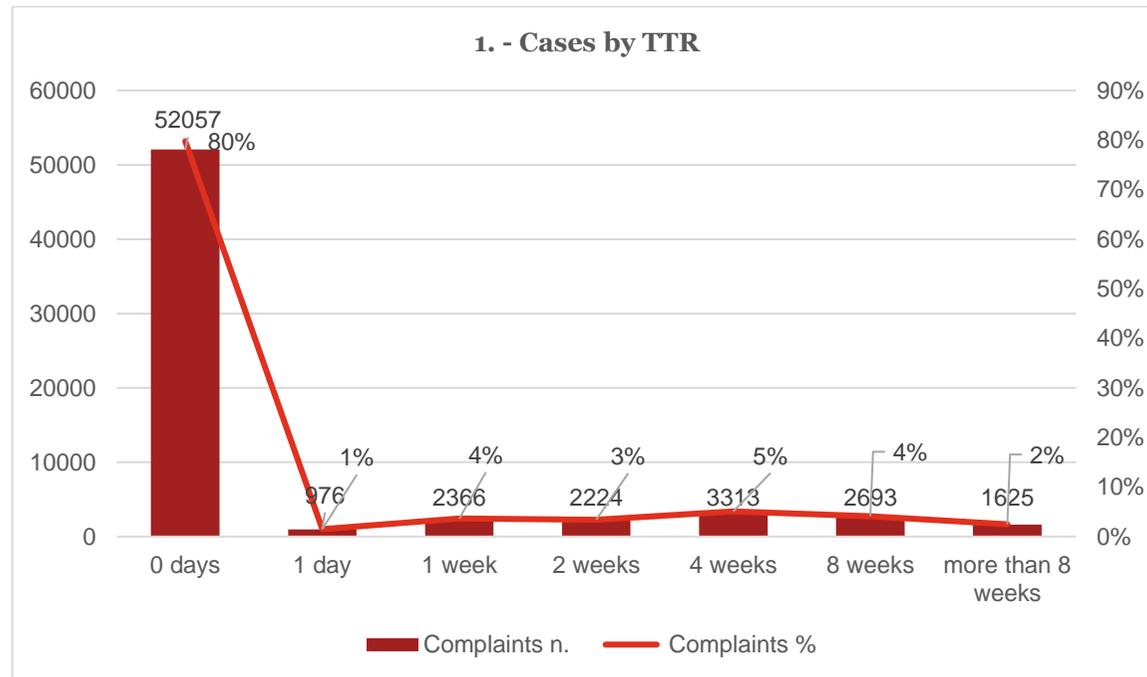
#	Proposed procedure	Result
8.	<p>Inspect evidence that 1st and 2nd line agent training and communication covers the following factors:</p> <ul style="list-style-type: none"> - Key ‘must haves’ from the 2008 Complaints Handling Standards, which are the EOD definition, meeting the definition of a resolved complaint, issuance of 8 week letters and documentation standards; - The overall behaviours that are expected from the Standards of Conduct (‘SoC’); - Key learnings that would address factors in the recent market survey and 2016 Key Drivers Analysis (‘KDA’); - Overall knowledge of the end-to-end complaints handling process and how this should be explained to customers; and - Known points of failure / common root causes and the action required to quickly resolve these for customers. <p>We will report any exceptions that we identify.</p>	<p>The following exceptions were noted:</p> <p>The training documents inspected do not make reference:</p> <ul style="list-style-type: none"> • To the key learnings that would address factors in the recent market survey and KDA.

Appendix 1: The results of our data analysis

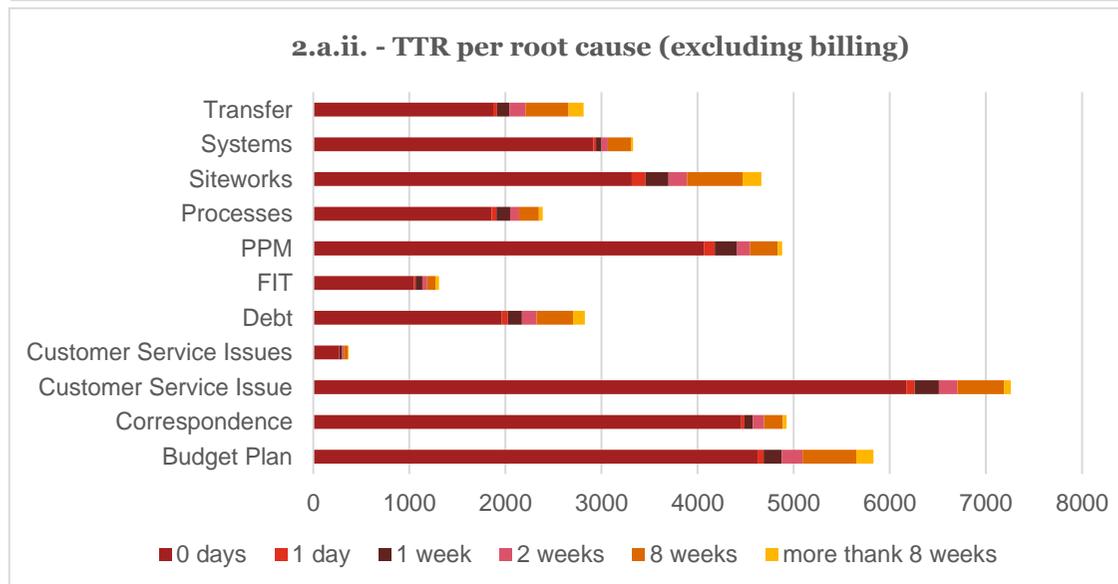
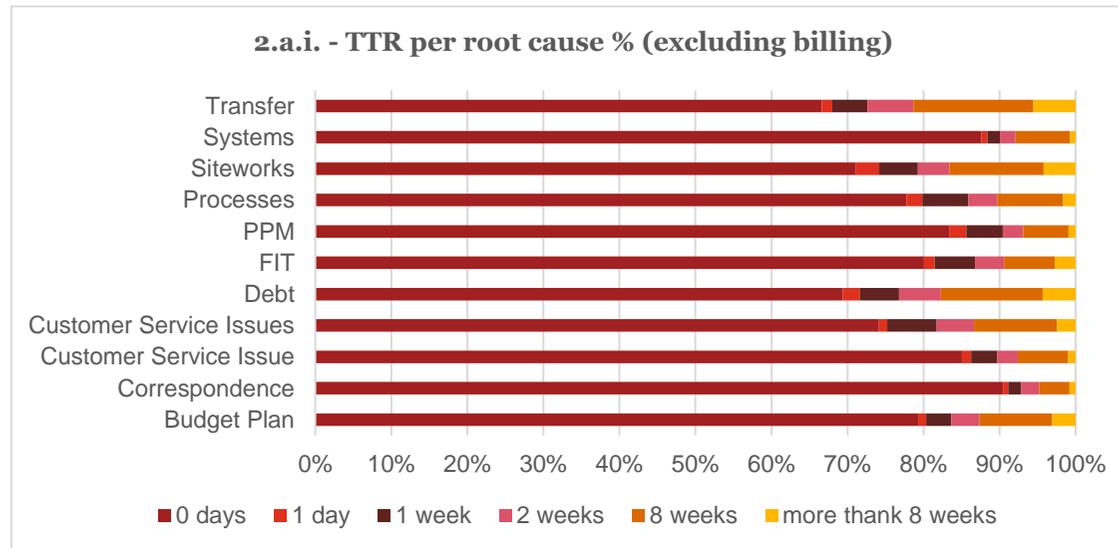
The output from our analysis of the case data held on the Utility Warehouse complaints handling system

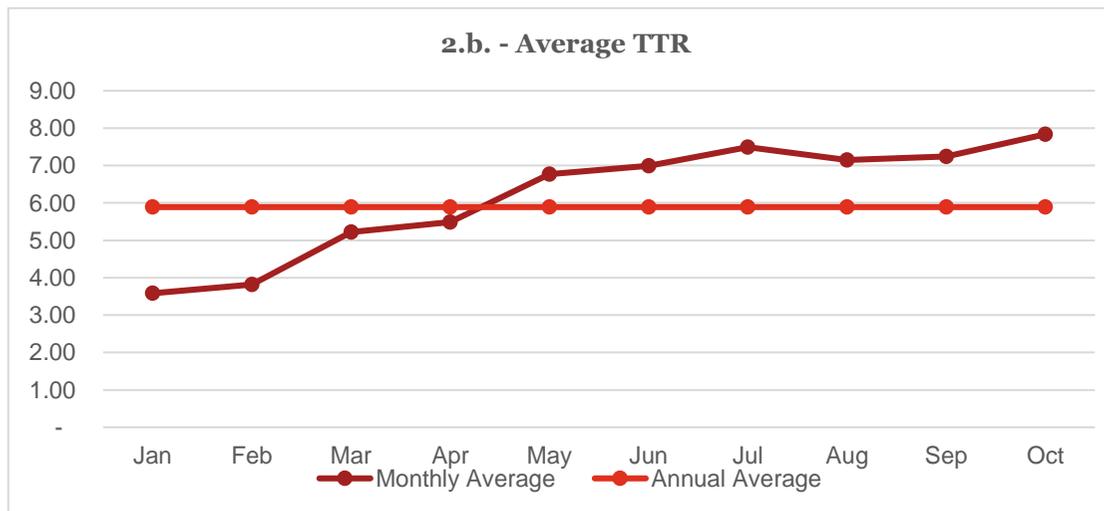
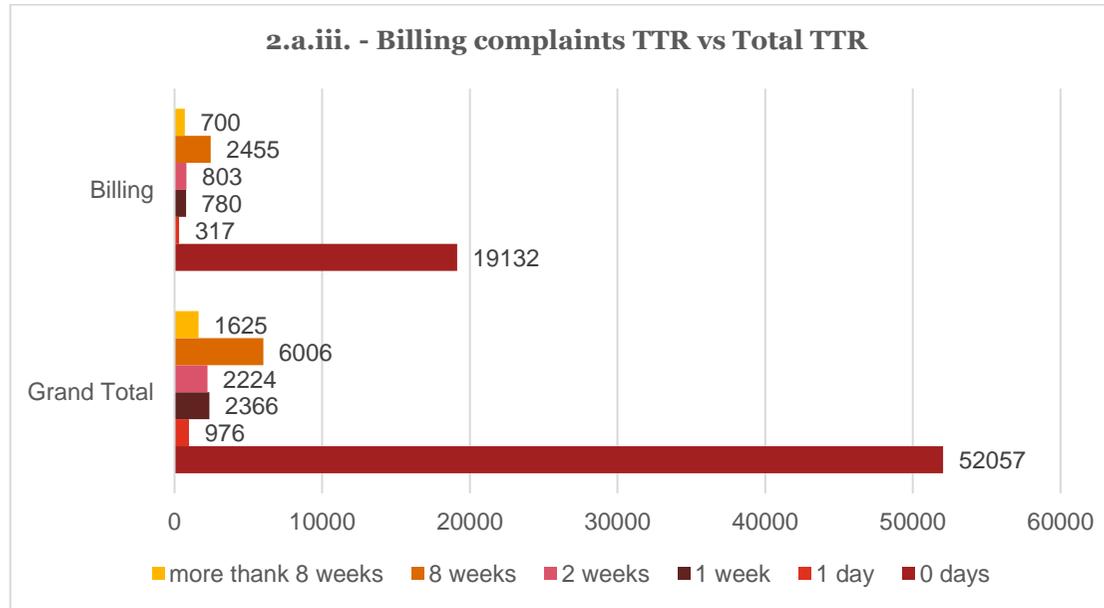
We obtained 'Resolved complaints 020116-311016.xlsx', this is an extract detailing all complaint cases that have been closed within the period January to October 2016.

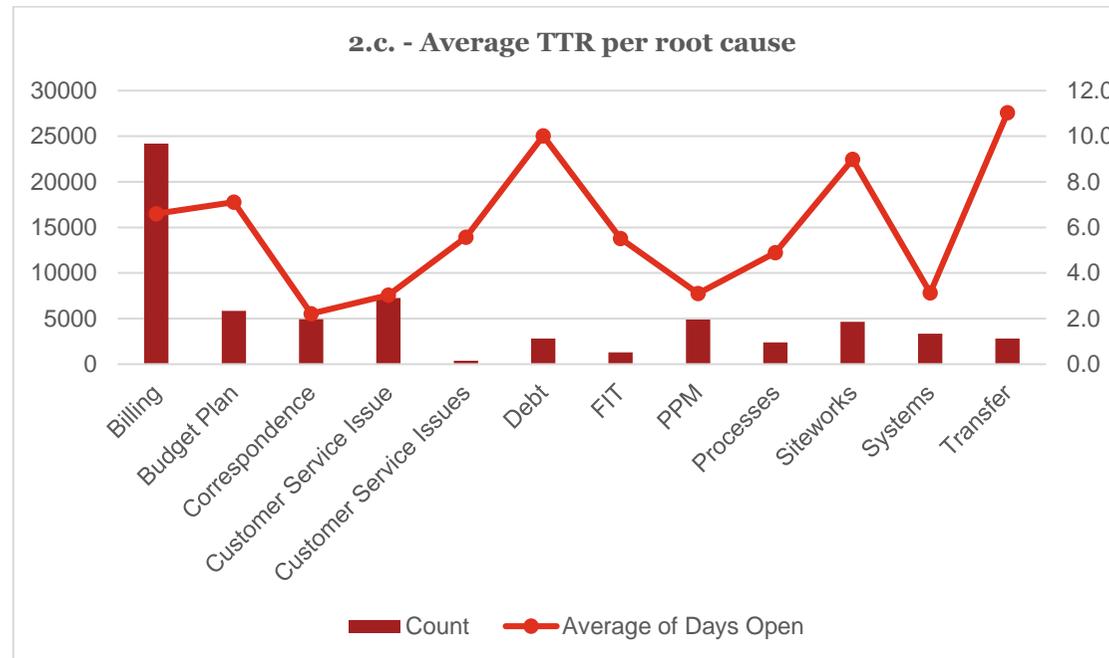
We have analysed the case data by calculating the time to resolution ('TTR') and creating the following categories to visualise our results: 0 Days, 1 Day, 1 Week, 2 Weeks, 4 Weeks, 8 Weeks and 8 Weeks or more. The vast majority (80%) of closed complaints are logged by UW as being closed within 0 days, with the results displayed below:



Here are the results* for TTR based on root cause (2.a.i., 2.a.ii, and 2.a.iii.), average TTR per month (2.b.), and average TTR per root cause (2.c.). The results are displayed below:







**Note, the following categories (amounting to 0.75% of the total population) have been omitted from the graphs above to improve the clarity of presentation: Billing or Charge, Deposit or refund, During Smart Installation, Gold Status Query, Partner conduct, Post Smart Installation, Pre Smart Installation, Promotion or Offer, Remote sign up, Supply of services, and Tariff or Prices.*

Based on the above graphs we can see that the vast majority of complaints are closed on the same day (2.a.i.), regardless of the root cause: complaints relating to "Transfers" are the ones with the smallest population closed on the same day (approximately 65%) whilst complaints relating to "Correspondence" are the ones with the largest population of complaints closed on the same day (approximately 90%).

The amount of complaints per root cause (2.a.ii.) does not appear to have an impact on the TTR.

Graph 2.b. shows that the average TTR has increased during the year and from April has been above the annual average of approximately 5.5 days. The lowest average TTR (below 4 days) was seen for complaints closed in January 16, whilst the highest in October 16 (approximately 8 days).

Appendix 2: Procedure 5 – test criteria

For procedure 5 we have applied the following criteria to determine whether to report an exception or not.

Test	Source	Criteria to accept (no exception noted)	Criteria to reject (exception noted)
1. Does the agent ask three data protection questions?	<ul style="list-style-type: none"> Utility Warehouse Internal Policy 	<p>The agent asks three security questions from the following list:</p> <ul style="list-style-type: none"> Account number Name of account holder Account postal address Account email address <p>NB. Only applicable for complaints made by telephone.</p>	<p>The agent does not ask three security questions from the following list:</p> <ul style="list-style-type: none"> Account number Name of account holder Account postal address Account email address
2. Does the agent demonstrates to the customer that they have listened and understood their complaint?	<ul style="list-style-type: none"> Standards of Conduct 	<p>The agent clearly demonstrates a detailed understanding of the customer’s complaint.</p>	<p>The agent fails to demonstrate a detailed understanding of the customer complaint.</p>
3. Does the agent speak in a polite tone and flex their style according to the customer's tone?	<ul style="list-style-type: none"> Standards of Conduct Ofgem Priority KDA 	<p>Some positive indicators are identified and no negative indicators.</p> <p>Positive indicators:</p> <ul style="list-style-type: none"> Agent uses phrases such as “Please”, “Thank you”, “Sorry”. Agent repeats back to the customer what they have heard and receives positive confirmation from the customer. <p>Negative indicators:</p> <ul style="list-style-type: none"> Agent interrupts customer. Agent raises their voice. 	<p>Lack of positive indicators are identified and some negative indicators.</p> <p>Positive indicators:</p> <ul style="list-style-type: none"> Agent uses phrases such as “Please”, “Thank you”, “Sorry”. Agent repeats back to the customer what they have heard and receives positive confirmation from the customer. <p>Negative indicators:</p> <ul style="list-style-type: none"> Agent interrupts customer. Agent raises their voice.
4. Does the agent speak clearly without jargon?	<ul style="list-style-type: none"> Standards of Conduct 	<p>Agent does not use industry terms and acronyms that are not in general use by the public.</p>	<p>Agent uses industry terms and acronyms that are not in general use by the public.</p>

AUPs in respect of Utility Warehouse's complaints handling performance

Test	Source	Criteria to accept (no exception noted)	Criteria to reject (exception noted)
5. Does the agent recognise that the customer has expressed dissatisfaction?	<ul style="list-style-type: none"> ▪ Utility Warehouse Internal Policy 	The agent recognises that the customer has expressed dissatisfaction during the customer interaction.	The agent fails to recognise expression of dissatisfaction during the customer interaction.
6. Did the agent correctly identify the root cause? Where insufficient information is available, did the agent correctly identify the next required action?	<ul style="list-style-type: none"> ▪ Utility Warehouse Internal Policy ▪ Ofgem Priority KDA 	Either: <ul style="list-style-type: none"> a) The cause identified by the agent on initial contact was the same as the final resolution required; or b) The agent does not have sufficient information on initial contact to diagnose the root cause and correctly identifies the next required action. 	The resolution or next required action identified by the agent on initial contact is incorrect based on the information provided to the agent.
7. Does the agent agree the action to be?	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) ▪ Ofgem Priority KDA 	The agent identifies the next action, agrees this with the customer and there is evidence to confirm the agreed action was carried out.	The agent either: <ul style="list-style-type: none"> - does not identify the next required action; or - identifies the next required action but does not agree this with the customer; or - there is no evidence to confirm the agreed action was carried out.
8. Does the agent confirm and agree the timeframe needed to resolve the issue?	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) ▪ Ofgem Priority KDA 	The agent provides a timeframe for the next action and agrees this with the customer.	The agent does not provide a timeframe for the next required action or the agent provides a timeframe but does not agree this with the customer.
9. Does the agent confirm that they will respond to the customer and when?	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) 	The agent confirms with the customer that they will respond to them on a designated timeframe.	The agent does not confirm that they will respond to the customer, or does confirm a response, but does not agree a timeframe.

AUPs in respect of Utility Warehouse's complaints handling performance

Test	Source	Criteria to accept (no exception noted)	Criteria to reject (exception noted)
10. Is there evidence that the agent followed up as promised?	<ul style="list-style-type: none"> Complaint Handling Standards (2008) 	The agent responds or performed the promised action on the timeframe agreed with the customer.	The agent does not respond or perform the relevant action, or does not follow up in line with the agreed timeframe.
11. Does the agent provide the customer with factually accurate information?	<ul style="list-style-type: none"> Standards of Conduct 	The agent does not provide false or misleading information to the customer.	The agent provides false or misleading information to the customer.
12. Does the customer only deal with one agent or where their complaint is passed on to another agent/team, is the handover effective?	<ul style="list-style-type: none"> Standards of Conduct Ofgem Priority KDA 	The customer deals with only one agent who owns the complaint through to resolution or if the complaint is handed over to another agent, a summary of the complaint is provided, the customer is contacted within policy timeframes and agreed actions are carried out by the new agent.	<p>The customer complaint is handed over to another team/agent and either</p> <ul style="list-style-type: none"> A summary of the complaint is not provided to the new agent resulting in the customer repeating the explanation of their complaint <p>or</p> <ul style="list-style-type: none"> The customer is not contacted by the new agent within policy timeframes <p>or</p> <ul style="list-style-type: none"> Agreed actions or incorrect actions are taken out by the new agent.
13. For complaints over 1 day +1 does the agent advise the customer on the complaints handling policy on the website or offer to send / is the complaints handling policy sent to the customer?	<ul style="list-style-type: none"> Complaint Handling Standards (2008) Ofgem Priority KDA 	<p>Where a complaint is not resolved by the end of the first working day after the day the complaint was received, the customer has been advised of the complaints handling policy.</p> <p>NB. Not applicable where the complaint has been closed as resolved before the end of the first working day after the complaint was received.</p>	Where a complaint is not resolved by the end of the first working day after the day the complaint was received, the customer has not been advised of the complaints handling policy.
14. Does the agent confirm with the customer that the complaint has been resolved to their satisfaction?	<ul style="list-style-type: none"> Complaint Handling Standards (2008) 	<p>The agent receives positive confirmation from the customer that their complaint has been resolved to their satisfaction.</p> <p>NB. Not applicable where communication is via email or letter.</p>	The agent does not request or receive positive confirmation from the customer that their complaint has been resolved to their satisfaction.

AUPs in respect of Utility Warehouse’s complaints handling performance

Test	Source	Criteria to accept (no exception noted)	Criteria to reject (exception noted)
<p>15. Is there evidence that the customer has been signposted to the redress scheme (Ombudsman) where their complaint has not been resolved within 8 weeks or they do not accept the resolution offered?</p>	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) ▪ Ofgem Priority KDA 	<p>There is evidence of a letter being sent signposting the customer to the Ombudsman, if the number of days from the date the complaint was received to the date the complaint was closed is equal to or greater than 8 weeks, or the customer does not accept the resolution offered.</p> <p>NB. Not applicable where the number of days from the date the complaint was received to the date the complaint was closed is less than 8 weeks.</p>	<p>There is no evidence of a letter being sent signposting the customer to the Ombudsman, if the number of days from the date the complaint was received to the date the complaint was closed is equal to or greater than 8 weeks, or the customer does not accept the resolution offered.</p>

Test	Source	Criteria to accept (no exception noted)	Criteria to reject (exception noted)
<p>16. Does the case record match the customer contact and conversation?</p>	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) 	<p>The case record includes:</p> <ul style="list-style-type: none"> - The date the complaint was received; - Whether the complaint was made orally or in writing; - Identity and contact details of complainant; - Account details; - A summary of the complaint; - A summary of any advice given or action taken/agreed; - Whether the complaint is resolved and the basis for this; and - The method for future communication <p>Where applicable:</p> <ul style="list-style-type: none"> - Details of any subsequent contact; <p>Where the complaint has not become a resolved complaint by the end of the working day after the complaint was received:</p> <ul style="list-style-type: none"> - The steps taken to resolve the complaint; - The date the complaint becomes resolved; - The date the specified time period expired; and - The date the consumer was signposted to the Ombudsman. 	<p>The case record does not include:</p> <ul style="list-style-type: none"> - The date the complaint was received; - Whether the complaint was made orally or in writing; - Identity and contact details of complainant; - Account details; - A summary of the complaint; - A summary of any advice given or action taken/agreed; - Whether the complaint is resolved and the basis for this; and - The method for future communication <p>Where applicable:</p> <ul style="list-style-type: none"> - Details of any subsequent contact; <p>Where the complaint has not become a resolved complaint by the end of the working day after the complaint was received:</p> <ul style="list-style-type: none"> - The steps taken to resolve the complaint; - The date the complaint becomes resolved; - The date the specified time period expired; and - The date the consumer was signposted to the Ombudsman.
<p>17. Where applicable a 14 day review / 28 day review have been performed?</p>	<ul style="list-style-type: none"> ▪ Utility Warehouse internal policy 	<p>There is evidence that an independent (supervisor) review of the complaint case has been performed when the age of the complaint has elapsed 14 days (and additionally following 28 days).</p>	<p>The complaint case is not independently reviewed once the age of the complaint is 14 days or older.</p>

AUPs in respect of Utility Warehouse's complaints handling performance

Test	Source	Criteria to accept (no exception noted)	Criteria to reject (exception noted)
18. Where applicable, an 8 week letter has been sent?	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) 	There is evidence that an 8 week letter was issued to the customer in the timeframe required.	Either the 8 week letter was never sent to the customer, or it was sent late according to the required timeframe.
19. Are all required actions completed before the complaint is closed as resolved?	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) 	There is evidence that all required actions have been completed prior to the complaint being closed as resolved.	There is no evidence that all required actions have been completed prior to the complaint being closed as resolved.
20. Was the complaint recorded on the correct start date?	<ul style="list-style-type: none"> ▪ Complaint Handling Standards (2008) 	<p>The start date recorded within the complaint handling system is the date the customer first expressed dissatisfaction.</p> <p>NB. Where subsequent contact is made by the customer in relation to an existing complaint, the start date is recorded as the date of the first complaint contact.</p>	The start date recorded within the complaint handling system is not the date the customer first expressed dissatisfaction.

Appendix 3:

Statement of responsibility

We take responsibility for this report which has been prepared on the basis set out below.

We have performed a set of 'Agreed upon procedures' in respect of Telecom Plus PLCs (trading as Utility Warehouse) complaint handling procedures. The procedures performed are those set out in our agreement with Utility Warehouse (dated 14 November 2016) and stated in section 1.3 (page 4) of this report. These procedures have been agreed with Utility Warehouse and Ofgem and are solely for the purpose of assessing Utility Warehouse's complaint handling procedures against the key elements of the 2008 Complaints Handling Standards ('CHS'), Standard of Conduct ('SoC') and Priority areas of concern highlighted in the KDA issued by Ofgem.

As stated within our contract, we understand Utility Warehouse is required to provide a copy of this report to Ofgem for publication on their website with the purpose of demonstrating that Utility Warehouse have fulfilled its obligation to obtain an independent audit of its complaint handling procedure. We consent to publication of this report on the Utility Warehouse and Ofgem external websites in pdf format, on the basis that we accept no duty, liability or responsibility to Ofgem or any other party for any use of or reliance on this report.



PricewaterhouseCoopers LLP

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In line with the terms of the contract between Utility Warehouse and PwC, our work does not represent an audit or assurance against generally accepted accounting practices. Accordingly, we do not express an opinion on the performance data contained within this report.

This document has been prepared for the intended recipients only, and then only for the purpose set out in our Contract dated **14 November 2016**. To the extent permitted by law, PricewaterhouseCoopers LLP does not accept or assume any liability, responsibility or duty of care for any use of or reliance on this document by anyone, other than (i) the intended recipient to the extent agreed in the relevant contract for the matter to which this document relates (if any), or (ii) as expressly agreed by PricewaterhouseCoopers LLP at its sole discretion in writing in advance.

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