Complaints Handling Policy & Procedure

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NECTR'S COMPLAINTS HANDLING POLICY OVERVIEW

1. Introduction

Nectr values our customers' right to raise a complaint and acknowledges that we are accountable for our actions.

Nectr continually strives to deliver a positive customer experience with every interaction. We understand, however, that we may not be able prevent some level of dissatisfaction despite our best efforts.

We hold the view that complaints and disputes should be dealt with as fairly and swiftly as possible, taking on learnings from these interactions so we can continue to improve and learn from every experience. Nectr's complaints policy has been developed in accordance with the National Energy Retail Law (NERL), the Energy Retail Rules (NERR), AS/NZS 10002-2014 and all other relevant standards. As a customer you have a range of rights including under the NERL and NERR (Energy Law). If there is any inconsistency between your rights and the rights that we set out in this document, we will ensure that we respect your rights under Energy Law.

2. Purpose and scope

This policy provides guidance to our customers who wish to make a complaint and to our staff who respond to those complaints on the key principles and concepts of our complaint management system.

This policy applies to all staff receiving or managing complaints from customers regarding our products and services. This policy also applies to contractors who are engaged by us (we refer to these as staff below).

2.1 Commitment

As a company, we expect staff at all levels to be committed to fair, effective and efficient complaint handling.
The following table outlines the nature of the commitment expected from staff and the way that commitment should be implemented.

Who	Commitment	How
Managing Director	Promote a culture that values complaints and their effective resolution	• Report publicly on Nectr's complaint handling. • Provide adequate support and direction to key staff responsible for handling complaints. • Regularly review reports about complaint trends and issues arising from complaints. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints to resolve them promptly. • Encourage staff to make recommendations for system improvements. • Recognise and reward good complaint handling by staff. • Support recommendations for product, service, staff and complaint handling improvements arising from the analysis of complaint data.
Chief Strategy Officer	Establish and oversee the effectiveness of our complaint management system.	• Develop the foundation Policy • Develop the foundation Procedure • Oversee the implementation of the Policy and Procedure
Manager, Risk & Compliance	Report on the effectiveness of our complaint management system.	• Provide regular reports to the Chief Strategy Officer on issues arising from complaint handling work. • Develop training material consistent with the Policy and Procedure. • Monitor complaints for any potential compliance breaches. • Ensure recommendations arising out of complaint data analysis are canvassed with the Chief Strategy Officer and implemented where appropriate.
Manager, Customer Operations	Manage and continuously improve our complaints management system	• Recruit, train and empower staff to resolve complaints promptly and in accordance with Nectr's policies and procedures. • Encourage staff managing complaints to provide suggestions on ways to improve the organisation's complaint management system. • Encourage all staff to be alert to complaints and assist those responsible for handling complaints resolve them promptly. • Recognise and reward good complaint handling by staff. • Develop training material consistent with the Policy and Procedure. • Monitor complaints for any potential compliance breaches. • Keep informed about best practice in complaint handling.
All Nectr staff	Demonstrate exemplary complaint handling practices	• Understand and comply with Nectr's complaint handling practices. • Treat all people with respect, including people who make complaints. • Assist people make a complaint, if needed. • Comply with this policy and its associated procedures. • Identify potential non-compliance as evident from complaints. • Provide feedback to management on issues arising from complaints. • Provide suggestions to management on ways to improve the organisation's complaints management system. • Implement changes arising from individual complaints and from the analysis of complaint data as directed by management.

3. Terms and Definitions

Complaint

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

Complaint management system

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

Policy

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

Procedure

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

NECTR'S COMPLAINTS HANDLING POLICY

Guiding principles to our Policy

Step 1: Facilitate complaints

People focus

We are committed to seeking and receiving feedback and complaints about our services, systems, practices, procedures, products and complaint handling.

Any concerns raised in feedback or complaints will be dealt with within a reasonable time frame.

People making complaints will be:

- Provided with information about our complaints handling process
- Provided with multiple and accessible ways to make complaints
- Listened to, treated with respect by staff and actively involved in the complaint process where possible and appropriate; and
- Provided with reasons for our decision/s and any options for redress or review.

No detriment to people making complaints

We will take all reasonable steps to ensure that people making complaints are not adversely affected because a complaint has been made by them or on their behalf.

Anonymous complaints

We accept anonymous complaints and will carry out an investigation of the issues raised where there is enough information provided.

Accessibility

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

We will also provide customers with information on their right to contact the relevant energy ombudsman in their State at any time for independent advice and information, as well as go directly to the relevant ombudsman if they are dissatisfied with our handling

of their complaint or dispute. We will provide contact details to the relevant ombudsman in each state we operate in on our website.

No charge

Complaining to us is free.

Step 2: Respond to complaints

First call resolution

Where possible, complaints will be resolved at first contact with Nectr Customer Care.

Responsiveness

We will promptly acknowledge receipt of complaints.

We will assess and prioritise complaints in accordance with the urgency and/or seriousness of the issues raised. If a matter concerns an immediate risk to safety or security the response will be immediate and will be escalated appropriately.

We are committed to managing people's expectations, and will inform them as soon as possible, of the following:

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

Objectivity and fairness

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

We will ensure that the person handling a complaint is different from any staff member whose conduct or service is being complained about.

Conflicts of interests, whether actual or perceived, will be managed responsibly. In particular, internal reviews of how a complaint was managed will be conducted by a person other than the original decision maker.

Responding flexibly

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

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

Confidentiality

We will protect the identity of people making complaints where this is practical and appropriate.

Personal information that identifies individuals will only be disclosed or used by Nectr as permitted under the relevant privacy laws, secrecy provisions and any relevant confidentiality obligations.

Step 3: Manage the parties to a complaint

Complaints involving multiple organisations

Where a complaint involves multiple organisations, we will work with the other organisation/s where possible and with appropriate consents from the customer, to ensure that communication with the person making a complaint and/or their representative is clear and coordinated.

Subject to privacy and confidentiality considerations, communication and information sharing between the parties will also be organised to facilitate a timely response to the complaint.

Where a complaint involves multiple areas within our organisation, responsibility for communicating with the person making the complaint and/or their representative will also be coordinated.

Where our services are contracted out, we expect contracted service providers to have an accessible and comprehensive complaint management system. We take complaints not only about the actions of our staff but also the actions of service providers. Where our services are contracted out to parties that may be dealing with customers on our behalf, i.e. our agents, those parties will be required to agree to abide by this policy.

Complaints involving multiple parties

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

Empowerment of staff

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

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

Managing unreasonable conduct by people making complaints

We are committed to being accessible and responsive to all people who approach us with feedback or complaints. At the same time our success depends on:

- Our ability to do our work and perform our functions in the most effective and efficient way possible
- The health, safety and security of our staff, and
- Our ability to allocate our resources fairly across all the complaints we receive.

When people behave unreasonably in their dealings with us, their conduct can significantly affect the progress and efficiency of our work. As a result, we will take proactive and decisive action to manage any conduct that negatively and unreasonably affects us and will support our staff to do the same in accordance with this policy.

NECTR'S COMPLAINTS HANDLING PROCEDURE

1. Complaints management system

First call resolution

Escalated call resolution

2. Introduction

When responding to complaints, staff should act in accordance with our complaint handling procedures as well as any other internal documents providing guidance on the management of complaints.

Staff should also consider any relevant legislation and/or regulations when responding to complaints and feedback.

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

3. Receipt of complaints

We will record the complaint and its supporting information. We will also assign a unique identifier to the complaint file.

The record of the complaint will document:

- The contact information of the person making a complaint
- issues raised by the person making a complaint and the outcome/s they want
- any other relevant information, and
- any additional support the person making a complaint requires.

4. Acknowledgement of complaints

We will acknowledge receipt of each complaint promptly, and preferably within 3 working days.

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

5. Initial assessment and addressing of complaints

5.1 Initial assessment

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

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

- How serious, complicated or urgent the complaint is
- Whether the complaint raises concerns about people's health and safety
- How the person making the complaint is being affected
- The risks involved if resolution of the complaint is delayed, and
- Whether a resolution requires the involvement of other organisations.

5.2 Addressing complaints

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

- Give the person making a complaint information or an explanation
- Gather information from the product, person or area that the complaint is about, or
- Investigate the claims made in the complaint.

We will keep the person making the complaint up to date on our progress, particularly if there are any delays. We will also communicate the outcome of the complaint using the most appropriate medium. Which actions we decide to take will be tailored to each case and take into account any statutory requirements.

6. Providing reasons for decisions

Following consideration of the complaint and any investigation into the issues raised, we will contact the person making the complaint and advise them:

- The outcome of the complaint and any action we took
- The reason/s for our decision
- The remedy or resolution/s that we have proposed or put in place, and
- Any options for review that may be available to the complainant, such as an internal review, or external review to the relevant energy ombudsman in your State.

7. Closing the complaint, record keeping, redress and review

We will keep comprehensive records about:

- How we managed the complaint
- The outcome/s of the complaint including whether it or any aspect of it was substantiated, and recommendations made to address problems identified and any decisions made on those recommendations, and
- Any outstanding actions that need to be followed up.

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

8. Right to access the Energy and Water Ombudsman

We will inform people who make complaints to or about us about any internal or external review options available to them, including the relevant energy ombudsman in your State.

All our customers have the right to contact the relevant energy ombudsman in their State at any time for independent advice and assistance.The contact details for the relevant ombudsman in the states we operate in are provided below:

Energy & Water Ombudsman NSW

Freepost: Reply Paid 86550, Sydney South NSW 1234

Free call: 1800 246 545

Free fax: 1800 812 291

Email: complaints@ewon.com.au

Online complaints: www.ewon.com.au/complaints

Energy & Water Ombudsman QLD

By Post: PO Box 3640, South Brisbane BC QLD 4101

Free call: 1800 662 837

Fax: (07) 3087 9477

Email: complaints@ewoq.com.au

Online complaints:
www.ewoq.com.au/complaints/submit-a-complaint

Energy and Water Ombudsman SA

By Post: GPO Box 2947, Adelaide SA 5001

Free call: 1800 665 565

Online complaints:
www.ewosa.com.au/submit-a-complaint

ACT Civil & Administrative Tribunal (ACAT)

By Post: GPO Box 370, Canberra ACT 2601

Free call: (02) 6207 1740

Fax: (02) 6205 4855

Email: acatenergyandwater@act.gov.au

Online complaints: https://www.acat.act.gov.au/fees-and-forms/online-forms/energy-and-water-complaint-form

National Services

Interpreter: 131 450
- For help using an interpreter visit TIS

National Relay Service: 133 677
- For help using an interpreter visit NRS

9. Accountability and learning

9.1 Analysis and evaluation of complaints

We will ensure that complaints are recorded in a systematic way so that information can be easily retrieved for reporting and analysis.

Regular reports and records will be maintained on:

- The number of complaints received
- The outcome of complaints, including matters resolved at the frontline
- Issues arising from complaints
- Systemic issues identified, and
- The number of requests we receive for internal and/or external review of our complaint handling.
- Regular analysis of these reports will be undertaken to monitor trends, measure the quality of our customer service and make improvements.

9.2 Monitoring of the complaint management system

We will continually monitor our complaint management system to:

- Ensure its effectiveness in responding to and resolving complaints, and
- Identify and correct deficiencies in the operation of the system.

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

9.3 Continuous improvement

We are committed to improving the effectiveness and efficiency of our complaint management system. To this end, we will:

- Support the making and appropriate resolution of complaints
- Implement best practices in complaint handling
- Recognise and reward exemplary complaint handling by staff
- Regularly review the complaints management system and complaint data, and
- Implement appropriate system changes arising out of our analysis of complaints data and continual monitoring of the system.

10. Self-meter reads

Where a customer is sent a bill that is based on an estimated reading of the electricity meter (where the meter is not an interval meter), the customer may request an adjusted bill based on the customer's own reading of the meter before the due date of the bill in accordance with the National Energy Retail Rules. Nectr will publish a guide to self reads on its website.

Nectr may reject a customer's self-reading of their meter in accordance with the circumstances set out in the National Energy Retail Rules. If Nectr rejects a reading, it will notify the customer in writing of the specific reasons for the rejection. An example of a reason for rejection may be that the number value of the customer read estimate provided for cumulative energy consumed is smaller than a previous actual read of the meter.

The notice sent to the customer will inform the customer that they have the right to lodge a dispute with the energy ombudsman where the customer is not satisfied with the retailer's decision. The notice will also explain that a customer may also request a review of the bill sent generally.

Where Nectr notifies a customer that it has rejected a self-reading of the customer's meter, the customer may request that the decision be reviewed or may contact the energy ombudsman to lodge a complaint. Where a customer requests a review or raises a complaint, Nectr will review the request or complaint within 7 business days and respond to the customer in writing. While the customer's request or complaint is under review, Nectr will not seek payment of any disputed amount.

11. Contact us to lodge a complaint

Nectr Customer Care is your first point of reference for all complaints, questions, or where you wish to provide feedback.

Nectr Customer Care can be contacted on 1300 111 211, via email at complaints@nectr.com.au or via our website on www.nectr.com.au. You can also send a complaint to us via post (PO Box 1957 North Sydney NSW 2059). Our business address is Level 25, NorthPoint Tower, 100 Miller Street, North Sydney NSW.

Need an interpreter?

Where you need an interpreter please call 131 450. For help using an interpreter please visit the Translation Interpreting Service.

Deaf or have a hearing or speech impairment?

If you are deaf or have a hearing or speech impairment please call 133 677 - For help using this service please visit the National Relay Service website.