



# Complaint Handling Policy

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## Summary

1.1 In keeping with SunOpt Solar's Retail obligations and Compliance Framework, SunOpt Solar will undertake several activities to ensure that customer complaints are managed in an efficient and timely manner and in accordance with the terms of SunOpt Solar's policies.

## 2 Background

2.1 This Complaints Policy has been developed by SunOpt Solar following the consideration of a few factors. It is recognised that maintaining an effective and efficient Complaints Management System will contribute towards increasing customer satisfaction, customer retention, early recognition of system and process failures, quality management systems, as well as an effective compliance and risk monitoring system.

2.2 Whilst this policy should refer to compliance with the Australian Standards, SunOpt Solar has established this Policy in line with International Standards (ISO 10002).

2.3 The corner stone of SunOpt Solar is its ability to deliver Simple, Transparent and Customer Focused Products and Services to its customers. In order to deliver this SunOpt Solar has adopted the international Standard for Complaints Handling

## 3 International Standards for Complaints Handling (ISO 10002)

3.1.1 ISO 10002:2006 recognises a few elements as the guiding principles for effective complaints management. These are Visibility, Accessibility, Responsiveness, Objectivity, Charges, Confidentiality, Customer-focused approach, Accountability and Continual Improvement.

3.2 This Policy incorporates complaints handling for customers of SunOpt Solar.

3.2.1 It should be noted that AS ISO 10002:2006 is not applicable for External Dispute Resolution or Employment Related Issues. The Employment Related Issues are covered in the Human Resources Procedures.

## 4 Definition of a Complaint

- 4.1 “A verbal or written expression of dissatisfaction about an action, a proposed action or a failure to act, or in respect of a product or service offered by or provided by a retailer, its employees or contractors where a response or resolution is explicitly or implicitly expected. This includes failure by a retailer to observe its published practices or procedures”.

## 5 Criteria for Identifying a Complaint under the Definition

- 5.1 A complaint can be received either in writing or verbally
- 5.2 Complaints differ from an enquiry when it is an “expression of dissatisfaction”
- 5.3 The expression can be related to but not limited to an action, a proposed action or a failure to act by SunOpt Solar.
- 5.4 The complaint can be in relation to and not limited to a product or service offered or provided by SunOpt Solar.
- 5.5 The complaint can be in relation to and not limited to SunOpt Solar and its employees or contractors and any representatives of the SunOpt Solar brand.
- 5.6 The complaint can be in relation to and not limited to failures by SunOpt Solar to observe its published practices or procedures.
- 5.7 Some examples of complaints can be in relation to;
- 5.7.1 Wrongful installation;
  - 5.7.2 Claims of harassment by Sales Agents or Debt Collection Agents;
  - 5.7.3 Failure to follow through on a service or advice given to a customer or on a customer request
  - 5.7.4 Failure to adhere to company policy and procedures as expressed by the customer

## 6 Recognition of Systemic Issues

- 6.1 It is crucial that SunOpt Solar can identify systematic and reoccurring issues and complaints. An effective complaints management system will be able to identify and capture this information for the purpose of increasing the quality of service and risk management.
- 6.2 A valuable source of identifying systematic issues is through internal customers or employees of SunOpt Solar who have the skills, knowledge and ability to identify systematic problems at early stages.
- 6.3 SunOpt Solar encourages staff to identify any potential or actual systematic issue and raise it with their immediate manager or notify the Regulatory and Compliance Department in order to enable SunOpt Solar to take corrective action and/or mitigate any exposure to the organisation.

## 7 Providing Visibility

- 7.1 In order to provide customers with visibility into the complaints management system and opportunity to raise concerns SunOpt Solar utilises several methods.
- 7.2 All correspondence issued provide a contact number and encourages customers to contact SunOpt Solar to provide feedback or raise any concerns.
- 7.3 Any customers making contact through this contact number is able to lodge a complaint for investigation by the Customer Service Representatives and if the customer is unhappy with the response, request to have the complaint escalated to a higher level within the business. The customer is then advised in writing that if he or she remains dissatisfied, he or she has the right to refer the complaint to the relevant external dispute resolution bodies.
- 7.4 Customers are invited to provide feedback or raise concerns through the SunOpt Solar web site or writing an email.
- 7.5 Contact Details:

Phone: 1300 87867 option 2

Mobile: 0466 778 667

Email: [care@sunopt.com.au](mailto:care@sunopt.com.au)

Post: PO BOX 3003, Wheelers Hill VIC 3150

## **8 Responsiveness**

- 8.1 All complaints received by SunOpt Solar will be acknowledged either in writing or verbally.
- 8.2 Level 2 and 3 complaints (described in section 18) will be acknowledged in writing when required.
- 8.3 All complaints received will be addressed promptly and in line with their urgency.
- 8.4 All complaints will be managed courteously and SunOpt Solar will ensure that the complainant is kept informed through the process
- 8.5 All complaints will be managed in line with this policy and the process.
- 8.6 All complaints will be resolved within a reasonable period of time, avoiding unnecessary delays. If a complaint is not resolved within one month of the date the complaint has been made the customer will be advised either in writing or verbally of their right to raise the complaint with the relevant external dispute resolution bodies.
- 8.7 If a complaint is not resolved internally in a manner acceptable to the customer an explanation will be provided to the customer either verbally or in writing of the resolution offered and details of the investigations. The customer will also be advised of their right to refer the matter to the relevant external dispute resolution bodies.

## **9 Objectivity**

- 9.1 Any complaint will be managed and assessed on its individual merit with SunOpt Solar's aim being to resolve the complaint.
- 9.2 All complaints will be managed in an equitable, objective and unbiased manner through the complaints handling process.

## **10 Charges**

- 10.1 Access to the complaints-handling process will be at no cost to the customer.

10.2 The customer will only incur a cost if he or she requires investigations to be carried out that require the assistance of a third party who charges for those investigations. For example, an external mediator or an auditor, technician visit etc.

## **11 Confidentiality and Record Keeping**

11.1 As per AS ISO 10002:2006 "Personally identifiable information concerning the complainant should be available where needed, but only for the purpose of addressing the complaint within the organization and should be actively protected from disclosure, unless the customer or complainant expressly consents to its disclosure".

11.2 As per section 7.1 of the Marketing Code, SunOpt Solar will retain records of the grounds for complaint, the outcome including the reasons for the outcome of the complaint and statistics of the number of complaints made to SunOpt Solar. These records will be kept on minimum for two years and made available for an independent audit on request.

## **12 Customer Focused Approach**

12.1 When managing a complaint SunOpt Solar will adopt the three main principles of natural justice.

12.2 THE HEARING RULE - SunOpt Solar will provide the customer with an adequate opportunity to state their complaint and respond to the outcomes of the investigations conducted by SunOpt Solar.

12.3 THE BIAS RULE - SunOpt Solar will address each complaint with an independent approach and ensure that each complaint is viewed on its own merits. The decisions will be impartial and based on a balanced and considered assessment of the results from the investigation without favouring one party.

12.4 THE EVIDENCE RULE - The decision making process with managing a complaint will be based on logical proof or evidence material at all times possible. SunOpt Solar wherever possible will avoid decisions based on speculation or suspicion.

## 13 Accountability and Reporting

- 13.1 On conclusion of the investigations of each complaint, SunOpt Solar will attempt to identify any system or process failures and if identified the issue will be raised with SunOpt Solar's Compliance Manager.
- 13.2 The Customer Care Manager will on a weekly basis report to the Executive Team the number and type of complaints received by SunOpt Solar.
- 13.3 The complaints register will be the basis of recording all complaints which will be reviewed by the Customer Care Manager on a monthly basis.
- 13.4 All systematic issues will be reviewed by the SunOpt Solar's Regulatory and Compliance Team on a monthly basis unless urgent action is otherwise required. Necessary action will be taken to mitigate the issue and the impact on customers.
- 13.5 Where appropriate the Compliance Manager will notify relevant regulatory bodies of any complaints received by SunOpt Solar.
- 13.6 Any reports will be prepared and submitted in line with relevant requirements.
- 13.7 It is further noted that for the purpose of performance reporting to the Commission the complaints are broken down into the following categories.

### 13.7.1 Complaints -Billing / Credit

"A complaint regarding overcharging, prices payment terms and methods, and debt recovery practices. This category may include billing errors, incorrect billing of fees and charges, failure to receive relevant government rebates, high billing, credit collection, and restriction due to billing discrepancy, but is not limited to these examples"

### 13.7.2 Complaints - Marketing

"A complaint associated with a retailers actions in seeking to sign up a small customer for a contract, and may include matters such as the nature of the approach or conduct, advertising campaigns, contract terms, sales techniques and misleading conduct, but is not limited to these examples"

### 13.7.3 Complaints -Meter Configuration

“A complaint associated with the meter configuration after the solar installation for a customer's meter to get feed-in-tariff and may include, but is not limited to, failure to meter configure by the customer electricity provider due to incomplete documentation. Failure or delay by electricity retailer to meter configure is not covered under complaints.

#### 13.7.4 Complaint - Other

“Any complaint about the quality and timeliness of retail services, other than a billing complaint, marketing complaint or a meter complaint. Examples include poor service, privacy considerations, failure to respond to complaints, and health and safety issues.”

## 14 Continual Improvement

### 14.1 Phone Monitoring

The Customer Care Manager will regularly conduct live call monitoring. The objective of this exercise is to determine the effectiveness and skill of the Customer Care Officer and identify training and development needs.

### 14.2 Customer Surveys

On an annual basis SunOpt Solar will conduct customer audits by randomly selecting a number of customers who have experienced the complaints handling process. The objective of this exercise is to identify possible improvements to the complaints management process. The intent of this exercise is to gauge the customer's satisfaction with the process experience and not the outcome of the complaint.

## 15 Process Management

15.1 The management of the Complaints Handling Process is the responsibility of SunOpt Solar's Customer Care Manager. However, SunOpt Solar is dedicated to ensuring that customer complaints are captured, managed and resolved in a timely manner. The Customer Care Manager will review on a monthly basis the complaints register and consider the nature of the complaints received with a view to identifying opportunities to improve the quality of the service offered to customers.

## 16 Stages of Complaints Handling

16.1 Level One/Frontline Complaints - These are complaints received and managed by the Customer Care Team.

16.2 Level Two/Escalated Complaints - Any complaints which cannot be resolved at frontline and requires detailed investigations and is escalated to a team leader or manager for resolution.

16.3 Level Three/Ombudsman - Complaints which cannot be resolved at a level 1 or 2 will be referred to a level 3 which is the External Dispute Resolution Body. These referrals will be done in writing. All such complaints will be managed in line with the requirements of the operational manuals. These complaints will be managed by the Regulatory and Compliance team or member of management team.

Any complaints which cannot be resolved at a level 1, 2 or 3 can be addressed through an Alternative Dispute Resolution body or in extreme cases through litigation.

## 17 Inclusions

In order to manage the process of complaints the following documents have been created.

They will form part of this policy. They are:

17.1 The template acknowledgement letter \_ Appendix A

17.2 The customer referral letter for complaints that cannot be resolved at a level 1 or 2 \_ Appendix B

## 18 Failure to Adhere to this Policy

Where it is recognised that a staff member has failed to comply with this policy, appropriate disciplinary action will be taken in light of the type and characteristics of the failure to comply.

## 19 Still unsatisfied with the outcome of the complaint handling

If you are not satisfied with the outcome of your complaint, you can refer the complaint to with the relevant Fair Trading or Consumer Affairs office in your state or territory, as follows:

ACT: Office of Regulatory Services  
Phone: (02) 6207 3000

NSW: Fair Trading  
Phone: 13 32 20

NT: Consumer Affairs  
Phone: 1800 019 319

Qld: Office of Fair Trading  
Phone: 13 74 68

SA: Consumer and Business Services  
Phone: 13 18 82

Tas: Consumer Affairs and Fair Trading  
Phone: 1300 654 499

Vic: Consumer Affairs  
Phone: 1300 558 181

WA: Consumer Protection  
Phone: 1300 304 054

## Appendix A

[date]

[name]

[address]

[suburb] [postcode]

Dear [name],

### **In relation to your concerns raised on <.....>**

We would like to thank you for taking the time to raise your concerns with SunOpt Solar and providing us with the opportunity to address them.

We are currently in the process of investigating your concerns and hope to be in contact with you within the next five business days. Your concerns are being addressed by the appropriate staff members and will be managed in an efficient and timely manner.

At SunOpt Solar we pride ourselves on providing outstanding customer experience in line with our vision and are always looking for opportunities to improve. Your feedback is valued and will assist us in this endeavour.

In the meantime, if you require any further assistance please contact us by:

Phoning our call centre on [1300 8 78667](tel:1300878667); or

E-mailing us at [care@sunopt.com.au](mailto:care@sunopt.com.au)

We appreciate your feedback and thank you for the opportunity given to address your concerns.

Yours sincerely,

<Name>

Customer Care Manager

## Appendix B

[date]

[name]

[address]

[suburb] [postcode]

Dear [name],

**In relation to your concerns raised on <.....>**

We would like to thank you for the opportunity given to address your concerns.

Despite the efforts made to date we have not been able to resolve your concerns to your satisfaction. As we are not able to move this matter towards a final resolution SunOpt Solar will now close your complaint.

You have the right to refer your concerns to the relevant regulatory authorities e.g. ACCC, Consumer Affairs Victoria, ACMA etc should you wish to pursue this matter further.

Once again, we thank you for the opportunity given.

Yours sincerely,

<Name>

Customer Care Manager