

---

# Office of Utilities Regulation

---

## Complaints Handling for Utility Service Providers

---

### Determination Notice

2023/GEN/045/DET.001

---



---

OFFICE OF UTILITIES REGULATION

2024 February 20

## DOCUMENT TITLE AND APPROVAL PAGE

### 1. DOCUMENT NUMBER:

### 2. DOCUMENT TITLE: COMPLAINTS HANDLING FOR UTILITY SERVICE PROVIDERS - DETERMINATION NOTICE

### 3. PURPOSE OF DOCUMENT

This document sets out the Office of Utilities Regulation's (OUR's) decisions regarding the resolution of complaints by utility service providers. It is anticipated that the decisions herein will assist in reducing conflicts between customers and service providers and enhancing customer satisfaction and experiences in their engagement with utility service providers.

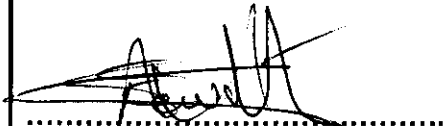
### 4. ANTECEDENT PUBLICATIONS

Publication Number	Publication Title	Publication Date
2022/GEN/016/GUI.001	Guidelines for Complaints Handling for Utilities' Service Providers	2022 July 14

### 5. Approval

This document is approved by the Office of Utilities Regulation and the decisions therein become effective on 2024 February 20

On behalf of the Office:



Ansord E. Hewitt  
Director-General

2024 February 20

## **Abstract**

The Office of Utilities Regulation's (OUR's) Value Propositions include the OUR's commitment to protect the interests of consumers of utility services and promote the awareness of their rights and responsibilities while understanding and being responsive to their needs and keeping them informed. To this end, the OUR initiated an annual Quality of Service (QoS) Symposium in 2016 with major and small utility service providers. One of the objectives of the QoS Symposium is to collaborate with utility service providers to build on their existing customer service practices and, by extension, enhance the customer service experience. Emerging from the discussions and input of the utility service providers from the Symposia between 2018 and 2021, the Guidelines for Complaints Handling for Utilities' Service Providers (**Document No: 2022/GEN/016/GUI.001**) (Guidelines) outlining minimum standards of practice was developed.

The Guidelines was finalised in 2022 July and sent to all the regulated utility service providers in the electricity, water and sewerage and telecommunications sectors. The OUR wishes to have the utility service providers adhere to a minimum set of standards and hence has moved to set out in this Determination Notice, a set of decisions developed from the Guidelines for implementation by the service providers.

This document contains seven (7) determinations on matters derived from the Guidelines, including Complaints Handling, Complaints Management, Training and Coaching and Quality Control.

## Definitions, Acronyms and Abbreviations

### Definitions

In this Determination Notice, unless the context otherwise requires, the following have the specific meaning:

Appeals	Complaints that have been accepted by the OUR for further investigation upon the request for the OUR's intervention due to the customer's dissatisfaction with the utility service provider's resolution of the complaint and after the exhaustion of the utility service provider's complaints process.
Complaints	An expression of dissatisfaction, whether justified or not and however made, about the standard of, or the delivery of service, the actions or lack of action by the utility, or its staff, which affects an individual service user or groups of users.
Consumer contacts	Communication to the utility service provider from consumers of its service or persons impacted by the service it provides. These communications may be in person, in writing, by telephone or electronic means.
Enterprise Content Management System	A system that enables organisations to securely manage content such as those in Word documents, PDFs, emails and scanned images to be securely stored and made accessible to authorised users.
Escalate	The review of complaints by senior personnel of the utility service provider who is detached from the service/unit that is the subject of the complaint if the matter has not been satisfactorily resolved, or the customer is dissatisfied with the outcome of an investigation or the manner in which that unit handled the issue/concern.
Decision	A determination which outlines the conclusion/outcome of an investigation by the utility service provider.
Government	Government of Jamaica.
Guidelines	Guidelines for Complaints Handling for Utilities' Service Providers ( <b>Document No: 2022/GEN/016/GUI.001</b> ) dated 2022 July 14.
Utility service providers	All regulated entities operating within the sectors for which the OUR has oversight.

## **Acronyms and Abbreviations**

JPS	-	Jamaica Public Service Company Limited
GS	-	Guaranteed Standards
NWC	-	National Water Commission
OUR Act	-	The Office of Utilities Regulation Act
OUR/Office	-	Office of Utilities Regulation
QoS	-	Quality of Service

## Table of Contents

<b>Abstract</b> .....	3
<b>Definitions, Acronyms and Abbreviations</b> .....	4
<b>Chapter 1 Introduction</b> .....	7
<b>Chapter 2 Legal Framework</b> .....	10
<b>Chapter 3 QoS Symposium Consultation Summary and OUR Determinations</b> .....	13
<b>3.1. Definition of Complaint</b> .....	13
<b>Determination 1: Complaint Definition</b> .....	13
<b>3.2. Complaints Handling Process</b> .....	13
<b>Determination#2: Complaints Handling Process</b> .....	18
<b>3.3. Complaints Management System</b> .....	18
<b>Determination #3 – Complaints Management</b> .....	20
<b>3.4. Training and Mentorship of Staff</b> .....	20
<b>Determination #4 – Training Manual</b> .....	23
<b>Determination #5 – Training and Mentorship Programme</b> .....	23
<b>3.5. Continual Improvement</b> .....	23
<b>Determination #6 – Continual Improvement – Quality Control Reporting and Internal Review</b> .....	24

# Chapter 1 Introduction

## 1.1. Background

- 1.1.1. The Office of Utilities Regulation's (OUR's) Value Propositions include its commitment to protect the interests of consumers of utility services and promote the awareness of their rights and responsibilities, while understanding and being responsive to their needs and keeping them informed. The Utilities Customer Satisfaction Survey 2016 commissioned by the OUR revealed that customers did not generally think highly of the service they receive from utility service providers. At the time, most respondents gave low grades to major utilities providers on the matter of customer satisfaction. Against this background the OUR was driven to assist in the creation of an environment where customer service representatives from the OUR, as well as major and small utility providers can converge to examine utilities customer service issues with a view to improving services offered to customers. To this end, the OUR initiated an annual Quality of Service (QoS) Symposium in 2016 with major and small utility service providers. One of the objectives of the QoS Symposium is to collaborate with utility service providers to build on some of their existing customer service practices and, by extension, enhance the customer service experience.
- 1.1.2. Over the years, the OUR has utilized the consultative environment of the Symposia, along with other National Consumer Satisfaction research and the annual the Mystery Shopping research, to measure the quality of customer service; assess compliance levels, product knowledge, and customer interactions; review the customer environment, and test the provider's escalation process. This is to ensure that consumers of utility services enjoy an acceptable quality of service. Emerging from the discussions and input of the utility service providers from the Symposia between 2018 and 2021, the Guidelines for Complaints Handling for Utilities' Service Providers (Document No. 2022/GENB/016/GUI.001) dated 2022 July 14 (Guidelines) were developed and sent to all the regulated utility service providers in the electricity, water and sewerage and telecommunications sectors.
- 1.1.3. The Guidelines were developed in collaboration with key personnel from utility service providers, namely: the Jamaica Public Service Company Limited (JPS), the National Water Commission (NWC), Digicel (Jamaica) Limited and Cable & Wireless Jamaica Limited and Columbus Communications Jamaica Limited (together referred to as Flow), as well as several small private water and sewerage service providers which include Can-Cara Development Limited, Dairy Spring, Dynamic Environmental Management Limited, Ironshore Utilities Sewerage Treatment Limited, Richmond Environment Limited, Runaway Bay Water Company, and Rosehall Development Limited. The Guidelines were

intended to build on the utility service providers' existing customer service practices and set out the processes to be observed by customer service/customer experience or other staff with responsibility for handling matters of consumer disputes or complaints. The Guidelines include provisions to remedy consumer complaints and recommends paths to develop best practices for improved customer service delivery.

1.1.4. The Guidelines aim to ensure that complaints are handled in a clearly defined and effective manner. Specifically, the key objectives include the following:

- Improve customer satisfaction in complaint resolution.
- Provide guidance, confidence, and support to staff concerning appropriate standards for complaints handling.
- Give members of the public the assurance that their concerns are dealt with fairly and appropriately.
- Ensure that appropriate confidentiality is maintained.
- Address causes of complaints.
- Reduce the risk of litigation by handling complaints from customers or prospective customers promptly, effectively, and consistently.

1.1.5. The Guidelines sought to further enhance the complaints handling process by defining the essential principles and processes in greater detail.

## **1.2. Purpose of this document**

1.2.1. Utility services increasingly play a strategic role in the lives of individuals and economies. They have become the main drivers of economic growth. The OUR recognises that utility service providers offer services in a rapidly evolving and complex operating environment. The challenges faced in such an environment include changing user expectations and greater demand for quality experience.

1.2.2. While the Guidelines outline a process to be observed by customer service/customer experience or other staff with responsibility for handling matters of dispute or complaint, the actions outlined in the document are voluntary and left to the discretion of the respective utility service providers. The results of the annual mystery shopping exercises conducted by the OUR have revealed a significant downward trajectory in the quality-of-service performance of the utilities service providers. Therefore, given the significance of the consultation process, poor rating of the major utilities in the OUR's Mystery Shopping



Surveys conducted over the last five (5) years, and in recognition that all utility service providers need to have a complaints handling process in place, the OUR aim is to prescribe minimum standards to which utility service providers are expected to adhere.

- 1.2.3. The OUR decided to develop this Determination Notice to outline the minimum requirements to be met in the complaints handling process utilised by all utility service providers regulated by the OUR. It is intended that such a prescription will bring some level of uniformity to the utility service providers' complaints handling process and ensure that customers' expectations are met, in the handling of their complaints.
- 1.2.4. This Determination Notice on Complaints Handling for Utility Service Providers, which is derived from the Guidelines, sets out the OUR's determinations regarding the resolution of complaints to be implemented by utility service providers and the OUR, where applicable. It is anticipated that the decisions herein will assist in reducing conflicts between customers and utility service providers and enhancing customers' satisfaction and experiences in their engagement with utility service providers.
- 1.2.5. It also summarises utility service providers' input during the consultation process at the QoS Symposia.
- 1.2.6. This Determination Notice and the Guidelines shall be read together. In so far as any provision of this Determination Notice contradicts the Guidelines, the provisions of this Determination Notice supersede that of the Guidelines.

## Chapter 2 Legal Framework

- 2.1. Pursuant to section 4 of the Office of Utilities Regulation Act (OUR Act), the Office, as part of its overall functions, regulates “prescribed utility services”. The First Schedule of the OUR Act defines “prescribed utility services” to include the generation, transmission, distribution and supply of electricity; the supply or distribution of water; the provision of telecommunications services; and the provision of sewerage services. Section 4(1)(a) of the OUR Act provides as follows:

*“4(1) Subject to the provisions of this Act, the functions of the Office shall be to –*

*(a) regulate the provision of prescribed utility services by licensees or specified organizations...”*

- 2.2. Similar functions with respect to the regulation of the electricity and telecommunications sectors are also provided for under the Telecommunications Act and the Electricity Act, 2015. Section 4(1) of the Telecommunications Act states in part:

*“4.-(1) The Office shall regulate telecommunications in accordance with this Act....”*

- 2.3. Section 4(d) of the Electricity Act, 2015 states:

*“4. In the regulation of the electricity sector, the following persons shall have the following roles –*

*...*

*(d) the Office shall regulate the electricity sector generally.”*

- 2.4. The OUR Act permits the OUR to give directions to regulated entities to meet consumers’ needs. Section 4(2)(a) of the OUR Act provides as follows:

*“(2) The Office may, where it considers necessary, give directions to any licensee or specified organization with a view to ensuring that –*

*(a) the needs of the consumers of the services provided by the licensee or specified organization are met...”*

A similar power is granted to the OUR under the Electricity Act, 2015 with regard to the supply of services to customers by the JPS. Section 5(a) of the Electricity Act, 2015 states:

*"5. The Office may, where it considers necessary, give directions to any licensee with a view to ensuring that –*

*(a) the needs of the consumers of the services provided by the Single Buyer are met." Guidelines for Complaints Handling for Utilities' Service Providers (Document Number: 2022/GEN/016/GUI.001)*

2.5. The OUR may, in the exercise of its functions take measures to protect the interests of consumers. Section 4(3)(b) of the OUR Act states:

*"(3) In the performance of its functions under this Act the Office shall undertake such measures as it considers necessary or desirable to –*

*...*

*(b) protect the interests of consumers in relation to the supply of a prescribed utility service."*

2.6. The matter of customer interest is also a priority under the Telecommunications Act where in section 4(3)(a), the OUR is required to take this into account when exercising its functions under that legislation. The section reads:

*"(3) In exercise of its functions under this Act, the Office may have regard to the following matters –*

*(a) the needs of the customers of the specified services"*

2.8 The matter of customer complaints handling is a critical component of utility service delivery that has been an area of focus for the OUR, in light of its obligations to protect consumer interests and to take measures to satisfy the needs of customers in relation to the regulated utility services.

2.9 It should be noted that the OUR has express powers under section 44(3)(a) of the Telecommunications Act, to make rules in relation to the administration and resolution of customer complaints in the telecommunications sector. The development of these rules have been the subject of separate consultation with that industry (see Notice of Proposed Rule Making – Quality of Service Standards and Consumer Protection Guidelines for the Telecommunications Sector (Document Number: 2014/TEL/005/NPR.002) dated 2014

November 10, and the Quality of Service Standards and Consumer Protection Guidelines for the Telecommunications Sector: OUR's Response to Comments on the Notice of Proposed Rule Making (Document Number 2016/TEL/009/RES.001) dated 2016 September 20). These rules are currently at the drafting stage. When finally promulgated, these rules will have specific application to the complaints handling procedures for utility service providers in the telecommunications sector and will supersede (in the case of conflict) or be in addition to (where there is no conflict), the requirements set out in this Determination Notice.

## Chapter 3 QoS Symposium Consultation Summary and OUR Determinations

### 3.1. Definition of Complaint

3.1.1. At the Symposia, the discussions with the utility service providers focused on their complaints or dispute handling process, and the ways in which they could enhance their processes to improve the customer experience and satisfaction. It was determined that all complaints handling personnel needed to be able to recognise what constitutes a valid complaint. Accordingly, as a result of the consultative process, the Office and the service providers have determined that it will adopt the following definition for a complaint:

*“A complaint is an expression of dissatisfaction, whether justified or not and however made, about the standard of, or the delivery of service, the actions or lack of action by the utility service provider, or its staff, which affects an individual service user or groups of users.”*

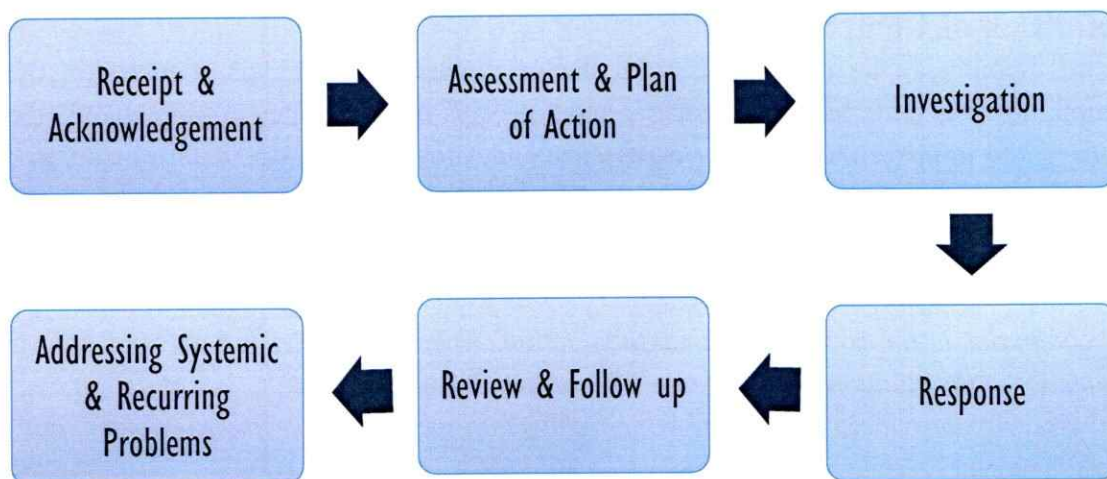
#### **Determination #1: Complaint Definition**

*“A complaint is an expression of dissatisfaction, whether justified or not and however made, about the standard of, or the delivery of service, the actions or lack of action by the utility service provider, or its staff, which affects an individual service user or groups of users.”*

### 3.2. Complaints Handling Process

Having defined a complaint, it was discussed and agreed that it was necessary for each utility service provider to have a documented and established Complaints Handling Process, which outlines specific activities and timelines. During the consultation process with the service providers at the QoS Symposia, the complaints handling process was examined, and it was generally acknowledged that the Complaints Handling Process to be adopted by utility service providers should incorporate the required activities as outlined in Figure 1 below as they are viewed as the most common and basic steps in handling complaints among utility service providers.

Figure 1: Complaints Handling Process Required Activities



The activities for each step in the Complaints Handling Process is further outlined below:

### 3.2.1. Receipt and Acknowledgement

3.2.1.1. Utility customers have a reasonable expectation that they will have access to their utility service providers through a variety of ways. They also expect an acknowledgement of their complaints. To facilitate this, as well as the proper handling of complaints, all customer contacts should be logged and include information stating the nature of the complaint, the date of the issue, the customer's contact and account details and any other pertinent information to facilitate speedy resolution of the grievance.

3.2.1.2. Customers contact their utility service provider through several avenues, which include:

- Telephone: Contact via this method is either through an easy-to-recall toll-free number provided by utility service providers for their call centres or another landline or mobile number.
- Email or written letter.
- Social media/Online: Sending direct messages to the utility service providers via their social media portals, applications (apps) and webchat on their website and other chat portals.
- Face-to-Face: A visit to the utility service providers' offices.

- 3.2.1.3. An acknowledgement of receipt of a complaint should be sent within the standard time established by the respective utility service providers. The acknowledgement of receipt should include information that will provide the complainant with a reference number, contact details, the standard timelines for resolution of the complaint and details of the complaint procedure, irrespective of the method used by the customer to make contact. Acknowledgement should be done in a verifiable form to include the distribution of a reference number or written acknowledgement.

### **3.2.2. Assessment and Plan of Action**

- 3.2.2.1. Upon receipt and acknowledgement of a complaint, it is critical for the utility service providers to undertake an assessment of the matter and devise a plan of action towards the investigation and provide a response. This assessment and action plan shall include the following activities:

- Establish the matter that is to be investigated and the information to be obtained to ensure important matters are not overlooked.
- Identify the remedy the complainant is seeking.
- State the steps involved and whether further information is required from the complainant, another person, or the organisation.
- Identify any special considerations that should apply to the complaint. For example: Is there sensitive or confidential information that needs to be safeguarded?
- Determine estimates of the time required to complete the investigation, bearing in mind established timelines in the Guaranteed Standards and Terms and Conditions of Service, where applicable.

### **3.2.3. Investigation and Escalation Process**

- 3.2.3.1. At the Symposia, it was recognized that planning and investigating a complaint is a dynamic and ongoing process. It is not always possible to know at the outset how an investigation will develop. The length of time to complete an investigation is dependent on the level of complexity. It is therefore important that the investigation process includes:

- Revisiting the plan of action periodically and making adjustments as may be necessary.
- Assistance from management, supervisors and other customer service officers to track and review the course of the investigation, where necessary. This is especially important if the investigation

cannot be completed by the officer to whom the complaint was initially assigned.

- A handover procedure. A common cause of inefficiency and delay in the investigation of a complaint is that the responsibility for investigating a complaint is often passed from one officer to another, without adequate handover arrangements. The management and flow of information pertaining to customers and investigation and handling of complaints are best done through an enterprise content management system which captures the relevant timelines and points of an escalation process (eg. Customer Information or Complaints Management System or database. See Section 3.3.).

3.2.3.2. The utility service provider's investigation process should aim to:

- Provide a response or decision concerning all issues raised by a complainant.
- Provide remedies where applicable.
- Be thorough.

### **3.2.4. Response, Review and Follow-up**

- 3.2.4.1. As discussed at the Symposia and outlined in the Guidelines, upon completion of the investigation, the complainant should be told the outcome of the investigation, including any findings or decisions reached, as soon as possible. Where investigations are not completed within the stipulated or promised timelines, updates are still to be provided within the originally specified timeline.
- 3.2.4.2. A written response should be provided to the customer detailing the utility service provider's decisions. This should include information addressing the issues raised by the customer and a breakdown of any data provided, where required.
- 3.2.4.3. The written response should be presented in simple language which avoids technical jargon. Where technical language is unavoidable, explanations and/or definitions should be provided in simple language.
- 3.2.4.4. In addition, utility service providers are aware that customers will need a written response in the event that they choose to appeal the decision to the OUR. As such, written responses to complaints should be provided to customers.
- 3.2.4.5. The written responses outlining the utility service provider's final decision should make clear that the complainant can appeal the decision to the OUR.



### **3.2.5. Addressing Systemic and Recurring Problems**

3.2.5.1. As discussed at the Symposia and outlined in the Guidelines, utility service providers should classify and analyse complaints to facilitate the identification and regular reporting of systemic and recurring problems. This assessment should also be done as a means of continual improvement. Highlighting systemic issues can be used by utility service providers to:

- Demonstrate commitment to using customer feedback to enhance customer service/experience.
- Assess the performance of the service provided.
- Change organisational practices and procedures.
- Redesign processes.
- Identify potential problems.
- Continually reassess customer expectations and needs.
- Categorise common complaints and find solutions to resolve issues quickly and efficiently to mitigate occurrences.

3.2.5.2. An effective complaints handling process should be easily accessible by members of the public, reliable, easy to use, actionable and well-known to staff.

3.2.5.3. The utility service provider should put in the public domain information to assist customers regarding:

- The right to complain about dissatisfaction with service/performance.
- The process to lodge a complaint, whether in writing or verbally.
- Where to lodge complaints.
- How the complaint will be processed.
- The estimated time required to complete an investigation.

## **Determination #2: Complaints Handling Process**

### **The Office has determined that:**

- i. All utility service providers must document and implement a **Complaints Handling Process** for their customers.
- ii. The Complaints Handling Process must comprise all the activities in Figure 1 of this Determination Notice.
- iii. All utility service providers shall publish information on the following critical aspects of the Complaints Handling Process:
  - a. The right of the customer to complain about dissatisfaction with service/performance.
  - b. The process to lodge a complaint, whether in writing or verbally.
  - c. Where to lodge complaints.
  - d. The estimated time required to respond to the complaint.
  - e. A commitment clause to keep customers' data and other information confidential.
- iv. Information on the Complaints Handling Process as outlined in iii. above must be easily accessible by customers of all utility service providers via various means, including:
  1. Visibly mounted in customer service call centres.
  2. Uploaded on utility service providers' websites.
  3. Available on utility service providers' apps.
  4. Verbalised by customer service agents when requested by customers.
  5. Available to customers upon request.

### **3.3. Complaints Management System**

- 3.3.1. The OUR and utility service providers recognise the need for a complaints management system to complement the Complaints Handling Process.

- 3.3.2. A proper data storage and collection system is required in the complaints handling process for several reasons, including the following:
- The location of problems— highlights trends in complaints received and how they are handled and resolved.
  - The time taken to resolve a complaint— monitor timeliness and efficiency.
  - Regular reporting prompts the utility service provider to monitor trends and quickly identify and respond to new challenges.
- 3.3.3. It was also recognised that an effective complaints management system should include the following:
- 3.3.3.1. Data collection and storage of information such as:
- Data related to the customer’s identity (*name, address, gender, means of contact, etc.*).
  - Identity of the staff member investigating the complaint.
  - Nature of the complaint.
  - Tracking of information regarding the progress of a complaint and the location of a file in motion.
  - Customer feedback.
- 3.3.3.2. Provisions that facilitate the ability to regulate the level of access by staff involved in complaints handling and facilitate staff compliance with the utility service provider’s record-keeping practices.
- 3.3.3.3. Provisions which enable staff to comply with the legislative and regulatory requirements that govern how the utility service provider records and notifies of its decisions or resolves complaints, as well as deal with principles of privacy. This includes compliance with the requirements under the Data Protection Act to ensure the security of customer information.

### **Determination #3 – Complaints Management System**

1. All utility service providers must establish a **Complaints Management System** to include:
  - a) Data related to the customer's identity (name, address, gender, means of contact, etc.)
  - b) The name of the staff member who initiated the handling of the complaint.
  - c) The type of problem.
  - d) The location of the problem.
  - e) Actions taken to address the complaint.
  - f) A seamless handover arrangement in the event the matter is to be handled by another agent.
  - g) Any resolution or decision made by the utility provider.
  - h) The time taken to resolve a complaint.
  - i) Customer feedback.

The **Complaints Management System** must have proper security features in place to restrict the level of access by staff and how the utility service provider records and notifies affected customers of its decisions or resolves complaints.

### **3.4. Training and Coaching of Staff**

It is recognised that training is essential to ensure that officers handling complaints are equipped with the right skills and attitude to perform the critical role entrusted to them. Since satisfied customers are the lifeblood of successful organisations, training officers and supervisors are responsible for identifying existing human weaknesses, which are likely to impact the ability of complaints-handling staff to efficiently discharge their functions while providing the best quality service when responding to customers' complaints.

Newly appointed staff assigned to a position that involves complaints handling should be exposed to training in the company's complaints handling policies and procedures systems to ensure he/she gets a good grasp of his/her primary function and understands his/her role, as well as possesses the requisite skillset to perform the assigned tasks. This exposure should be supplemented by training that deals with specific challenges that arise in complaint-handling situations, for example,

having an excellent service attitude, good writing skills, sound record-keeping skills, and the ability to deal with difficult complainants.

### **3.4.1. Training Manual**

3.4.1.1. It is important to educate complaint-handling staff about all aspects of the utility service provider's business, so they understand the nuances that may evolve in dealing with seemingly similar cases. As services and products will change and develop over time, staff members who handle complaints should be made aware of these changes.

3.4.1.2. It is, therefore, imperative that utility service providers document the complaints handling process in a Training Manual, which can be used as a tool to train new and existing staff members and act as a guide and source of reference by staff when handling complaints. This manual shall be reviewed and updated periodically for currency. The Training Manual shall include:

- A training schedule, subject to regular review.
- Information on:
  - The Complaints Handling Process
  - Various types of complaints.
  - How to handle various customer personality types.
  - How to handle customers with special needs, including those with disabilities and the elderly.
  - When to escalate a complaint.

### **3.4.2. Coaching**

3.4.2.1. Supervision and coaching are critical tools to facilitate overall goal attainment, as well as effective staff development, both for efficient complaints handling and skills acquisition. The following shall be borne in mind in ensuring utility service providers are well trained to handle customer complaints.

- The experience of the staff member — new staff members might need closer supervision and guidance in conducting the investigation than their more experienced counterparts.
- The nature of the complaints— frequently recurring complaints may be dealt with as a matter of routine, where staff develop high competencies in dealing with these issues due to their repetitiveness. Conversely, complaints that are complex or unusual or rarely lodged might require

staff with better-developed skillsets and maturity to conduct the investigation.

- The complainant—complainants who are physically challenged, vulnerable or displaying difficult behaviour might need special arrangements and/or closer supervision when making their complaints. In all such cases, an experienced senior investigator should be assigned to lead the investigation.

3.4.2.2. Supervision arrangements should be devised with several objectives in mind, such as:

- Providing support to staff handling complaints, particularly recent recruits.
- Monitoring to ensure that complaints are being handled correctly and, where justified, appropriate remedies are being provided.
- Identifying trends and special concerns that arise from scrutinising complaints, thus providing the basis for new or additional training.
- Useful tool for providing complaints staff with feedback on their performance and identifying weaknesses that may be corrected through training.

3.4.2.3. In the Guidelines, it was recognised that supervision, coaching and mentoring should be constant, may be formal or informal, with plenty of opportunity for regular consultation and feedback. This applies to experienced as well as new staff.

3.4.2.4. It is imperative that utility service providers develop a Training and Coaching programme for its customer service staff members.

3.4.2.5. The OUR and utility service providers agree that training objectives are best achieved if there is a sustained structured training programme incorporating specific issues that arise from time to time that allow for the transfer of training solutions to the workplace.



#### **Determination #4 – Training Manual**

1. Utility service providers shall establish a **Training Manual** for customer service representatives, which should include:
  - i. A training schedule, subject to regular review.
  - ii. Information on:
    - a) Various types of complaints.
    - b) How to handle various customer personality types.
    - c) How to handle customers with special needs, including those with disabilities and the elderly.
    - d) When to escalate a complaint.

#### **Determination #5 – Training and Coaching Programme**

1. All utility service providers should engage in at least one training session annually with their customer service staff.
2. Utility service providers must establish a **Training and Coaching Programme** for customer service representatives.

### **3.5. Continual Improvement**

It was agreed that the complaints handling process must be subjected to a continual improvement review process for it to be successful. This is in order to detect the changing needs and expectations of customers, identify trends in customer needs and improve efficiencies.

It is recommended that such a review is conducted every four (4) years. This in order to allow time for the review and implementation of any recommended changes.

#### **3.5.1. Quality Control & Internal Review**

Utility service providers should periodically review and analyse their complaints handling systems to gauge their efficiency and effectiveness. Both qualitative and quantitative measurements (for example, the number of complaints resolved in a given period) should be undertaken. Utility service providers should report on these performance indicators against the predetermined standards in their annual reporting.

#### **Determination #6 – Continual Improvement – Quality Control Reporting and Internal Review**

The Office has determined that utility service providers shall conduct a review of their Complaints Handling Process and Complaints Management Systems once every four (4) years. Changes implemented as part of the review process shall be reflected in the relevant documents, such as the utility's Complaints Handling Process Manual, Training Manual and Customer Charter.

A Quality Control report containing information on the review of these documents should be submitted to the OUR within three (3) months following their review.

### **3.6. Timeline for compliance with Determinations**

The table below outlines the timelines for compliance with the OUR's Determinations outlined in the body of this document. The timelines for implementing the Office's decisions are phased in order to allow the utility service providers sufficient time to implement them.

#### **Determination #7 – Timeline for Implementation**

1. **Determination #1: Definition of Complaint** – The Office has determined that utility service providers shall adopt the agreed **definition of a complaint** and incorporate it in their relevant documentation within six (6) months of the effective date of this Determination Notice.
2. **Determination #2: Complaints Handling Process** – The Office has determined that utility service providers shall implement the determination on establishing the **Complaints Handling Process** within six (6) months of the effective date of this Determination Notice.
3. **Determination #3: Complaints Management System** – The Office has determined that utility service providers shall implement the determination on establishing a **Complaints Management System** within one (1) year of the effective date of this Determination Notice.
4. **Determination #4: Training Manual** – The Office has determined that utility service providers shall implement the determination on developing a **Training Manual** for customer service representatives within nine (9) months of the effective date of this Determination Notice.



5. **Determination #5: Training and Coaching Programme** – The Office has determined that utility service providers shall implement the Determination on the development of a **Training and Coaching Programme** for their customer service representatives within nine (9) months of the effective date of this Determination Notice.
6. **Determination #6: Continual Improvement – Quality Control Reporting and Internal Review** – The Office has determined that utility service providers shall implement the determination on **Quality Control Reporting to the OUR** within three months following the four-year review of their Complaints Handling Process and Complaints Management Systems.
7. **Determination #7:** Except for Determination #6, all utility service providers should confirm their compliance in writing to the OUR within forty-five (45) working days of the effective implementation date of each Determination.

### 3.7 Compliance Reporting Regime

The OUR considers that reporting obligations can provide a comprehensive and holistic view of an organization's performance against key performance indicators. Therefore, the OUR, will undertake further consultation with the service providers to develop and finalise a compliance reporting regime for each service providers' Complaints Handling Process. It is anticipated that the consultation process will commence at the 2024 Quality of Service Symposium.