

# Code of Practice on Customer Service

## 1. Overarching Principles of the Code of Practice

- 1.1. We expect energy licensees to have robust systems and policies in place to ensure that their consumers receive supportive, timely and accurate customer service. The objective of this Code of Practice (CoP) is to help ensure that those expected customer services are provided and that customers are protected when liaising with their service providers. It aims to do this by putting in place mandatory levels of customer service that energy suppliers must provide to their domestic customers, including additional requirements for those customers in vulnerable circumstances. This will help ensure that all customers have a positive and timely customer service experience.
- 1.2. This CoP covers domestic premises for energy utilities – electricity and gas supply. It includes twelve over-arching measures underpinned by some detailed requirements. These are applicable to all gas and electricity domestic supply licensees in Northern Ireland.
- 1.3. Compliance with this CoP is a mandatory licence requirement on all domestic electricity and gas suppliers. Any breach of the CoP will be considered a breach of licence.
- 1.4. The obligations in this CoP will apply to each licensee and any representatives of the licensee. **For clarity, where a licensed company contracts with a third party for the provision of any services, the licensed company must ensure that the third party complies with all components of this CoP.** Any breaches of this CoP or the industry procedures by a third party will be deemed to be a breach by the licensed company.
- 1.5. Nothing in this CoP is intended to, or should be deemed to, constitute an exemption from existing regulatory requirements and/or obligations under other industry agreements.
- 1.6. Nothing in this CoP is intended to, or should be deemed to, constitute an exemption from each licensee's legal obligation to comply with any and all relevant legislation, statute, statutory instrument, regulation or order (or any provision thereof) or any subordinate legislation. Licensees are responsible for ensuring that the industry procedures they develop are compliant with all relevant legislation.

- 1.7. Where we refer to customer care registers or customer care register holders, this will apply to the existing customer care registers and customer care register holders (at time of publication this includes all suppliers). When the changes to the customer care register structure are implemented, the measures will apply to the customer care register(s) and customer care register holder(s) at that time. This is covered in the CoP for Consumers in Vulnerable Circumstances (Electricity Licence Condition 31 and Gas Licence Condition 2.11).
- 1.8. Where the UR considers it necessary to amend this CoP it will consult on any proposed changes. The consultation may be restricted to those companies holding an electricity or gas supplier licence and may include key stakeholders (e.g. consumer groups) or may be a public consultation, depending on the nature of the changes.

## **2. Measures included in the Code of Practice and requirements**

- 2.1. Each licensed company must comply with the following twelve measures in all aspects of their customer service operations to ensure all consumers can engage effectively with them and achieve fair outcomes.
- 2.2. These measures stipulate the overall mandatory requirements that all energy licence holders must meet in dealing with customers. It is the licence holders' responsibility to determine how best to deliver the measures. However, compliance monitoring will be based on the requirements determined by the UR.
- 2.3. For ease, the measures have been categorised into 2 sections – Customers, in particular those in Vulnerable Circumstances and Customer Contact Centre Services.
- 2.4. For clarification, the definition of vulnerable/vulnerability (in accordance with the CoP for Consumers in Vulnerable Circumstances) is as follows:

*'A consumer is deemed vulnerable when their personal characteristics or circumstances reduce their ability to engage effectively and achieve fair outcomes. A vulnerable consumer is significantly less able to protect or represent their interests and significantly more likely to suffer detrimental impacts on their health, wellbeing or finances.'*

## Customers, in particular those in vulnerable circumstances

**Measure 1 - Domestic consumers, in particular those in vulnerable circumstances, must be able to easily identify a method of contacting their energy supplier that meets their needs. The effectiveness of these methods must be regularly reviewed by suppliers.**

### **In order to fulfil this requirement, suppliers must:**

- (i) provide a customer contact service that enables all domestic customers to contact them easily. As a minimum, this service must include a range of contact methods that meet the needs of domestic customers, including the needs of those domestic consumers in vulnerable circumstances (as defined in the CoP for Consumers in Vulnerable Circumstances, and include provision for those customers who have English as a second language.
- (ii) provide as a minimum, to reflect the diversity of different customers' communication needs, a broad range of contact methods that reflect the needs of customers that:
  - a) are digitally excluded (e.g. a phonenumber/postal option).
  - b) find it easier to communicate digitally (e.g. digital methods of contact such as email, webform, live chat, SMS/secure messaging platforms or any new technology which falls into this category).
  - c) have special communication needs (e.g. customers with a visual or hearing impairment, or customers with a learning disability. Options should include but not be limited to braille, large font, alternative language format, screen reader, voice-text analytics or any new technology or system which falls into this category).
- (iii) provide a range of contact methods across all three areas listed in (ii) a – c above. These contact methods should be promoted to ensure awareness – information on the available contact methods should be prominently displayed on webpages and on all written communications to customers including all formats (no more than two clicks from the homepage on the supplier website and easily identifiable on each page in written communications).
- (iv) review the effectiveness of available contact methods, every two years (as a minimum) in line with the review period set out in Measure 10.1 of the CoP for Consumers in Vulnerable Circumstances.

- (v) The purpose of this review is to ensure that the contact methods on offer continue to best meet customers' needs. These reviews may highlight gaps, and these should be actioned. Furthermore, all contact methods should be promoted to ensure awareness. These reviews should be documented, and any changes made should be recorded. A copy of the review must be submitted to the Authority and a public version made available.
- (vi) Should contact methods be deemed lacking in any area as a result of the review, processes should be in place to provide the contact method required by customers (or a suitable alternative) as soon as practical but no later than 3 months from the date of the review.

**Measure 2 - Suppliers must have processes in place to identify and prioritise enquiries from domestic consumers in vulnerable circumstances who may require immediate assistance, or representatives acting on their behalf and in their interest. This should include adequate training to ensure these processes are being followed sufficiently (discussed under Measure 6 in customer contact centre services).**

**In order to fulfil this requirement, suppliers must:**

- (i) have processes to prioritise enquiries from:
  - a) domestic consumers in vulnerable circumstances who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice; and
  - b) any representatives acting on behalf and in the interest of a domestic consumer in vulnerable circumstances who, due to their circumstances or characteristics, may require immediate assistance, guidance or advice.
- (ii) have a clear policy on how they will take into account a customer's circumstances and characteristics when determining who to prioritise. The CoP for Consumers in Vulnerable Circumstances contains a definition of vulnerable/vulnerability and information for suppliers on consumer characteristics and circumstances. This must also take into account customers on the customer care register (e.g. customers with a visual or hearing impairment or a customer with a learning disability). Additional non-exhaustive examples of the characteristics and circumstances that could prompt a supplier to provide immediate assistance, guidance or support include:

- a) customers that are off-supply, or may soon be off-supply, due to the customer running out of credit on their pre-payment meter; and
  - b) customers whose characteristics or circumstances mean that their health could be significantly harmed if they are not provided with immediate assistance, guidance or support.
- (iii) recognise that vulnerability is transient and that an individual's characteristics or circumstances can change over time.
  - (iv) train agents to identify signs of vulnerability and be mindful that their customers will not always proactively indicate that they are vulnerable or self-identify as such.
  - (v) have policies and processes in place to easily facilitate a person or organisation contacting a supplier in the interest of, and on behalf of, a domestic consumer in vulnerable circumstances.
  - (vi) have processes to identify and prioritise enquiries from representatives contacting them on behalf of domestic consumers in vulnerable circumstances that require immediate assistance. These processes will also need to ensure that suppliers are able to verify third parties contacting them on behalf of a domestic consumer in vulnerable circumstances. This could be achieved by a registration process, similar to the nomination service for those customers who wish to have their bills redirected to a nominated person, where a third party is nominated.

**Measure 3 - Suppliers must implement appropriate processes/services to provide a freephone telephone number for domestic consumers that are on the Customer Care Register (CCR) and a local (low cost) phone number for those domestic customers who are experiencing financial difficulty. Eligible customers must be made aware of and directed to a suitable method of contact as soon as their supplier is aware of their eligibility.**

**In order to fulfil this requirement, suppliers must:**

- (i) provide a dedicated freephone number for domestic consumers on the customer care register (e.g. customers with a visual or hearing impairment or a customer with a learning disability).

Customers who fall into this category will be recorded on the CCR therefore these customers can be contacted via their preferred method of contact and provided the freephone number to use.

and;

- (ii) provide a local (low cost) telephone number for those experiencing financial difficulty.
  - This number must be provided at the earliest opportunity to the customer.
  - If a customer is in financial difficulty and is then added to the CCR, the freephone telephone number must be provided to them at the earliest opportunity.

Or suppliers can:

- (iii) provide a freephone number for all customers on the CCR or in financial difficulty;

or

- (iv) provide a freephone number for all domestic customers.

## Customer Contact Centre Services

**Measure 4 - At an overall level, suppliers must ensure they have and maintain robust internal capability, systems and processes to enable them to adequately deliver their customer contact centre services.**

**In order to fulfil this requirement, suppliers must:**

- (i) have the appropriate systems and processes (to include premises, facilities, staff, equipment and IT systems), to enable the provision of a quality and efficient customer contact centre service to their customers. These systems and processes must also reflect the needs of those consumers in vulnerable circumstances and how they are effectively served.
- (ii) ensure that their customer contact centres and associated services be adequately resourced to deal with all consumer contacts across a range of channels including telephone, emails, webchat and social media in a timely and efficient way.
- (iii) have in place systems and processes to ensure that customer service levels are maintained at all times throughout the year, including during periods of high call volumes.

**Measure 5 - Customers must be able to easily identify methods of contacting their suppliers.**

**In order to fulfil this requirement, suppliers must:**

- (i) ensure that customer enquiry service information is easy to find and prominently displayed on suppliers' websites (i.e. on, or one click away from the homepage of their website), suppliers' apps, and any written communication (e.g. on bills or statements of account) to the customer.
- (ii) ensure that customers are able to easily identify methods of contacting their suppliers which means that they can easily find information on suppliers' contact methods, so that customers can choose the method that meets their needs.
- (iii) consider the needs of domestic consumers in vulnerable circumstances (as set out under Measures 1-3 (consumers, in particular those in vulnerable circumstances section), including customers on the customer care register) when ensuring that enquiry service information is easy to find.
- (iv) regularly seek feedback from their customers about how to make it easy to find methods of contacting them, and to act on the feedback received. By seeking feedback from consumers on methods of contact, it will allow suppliers to tailor their approach to suit their customers' needs, including those in vulnerable circumstances.

**Measure 6 - Suppliers must ensure customer contact centre services are open at times that meet the needs of their domestic customers.**

**In order to fulfil this requirement, suppliers must:**

- (i) take into account the needs of their customers when setting their opening hours, including consideration of seasonality when there is likely to be higher call volumes, and an increase in email and social media contacts in winter.
- (ii) take into account the needs of customers that are unable to engage between standard opening hours 09:00 – 17:00 Monday to Friday (for example as standard opening hours may vary). For instance, by extending opening hours by one hour a day outside the normal eight hour working day Monday to Friday or five hours in total over the weekend.
- (iii) regularly review their opening hours (at least once annually, but more frequently if appropriate) to ensure that they are open at times that best meet their customers' needs. This must take account of seasonality, for example in



winter, where there is likely to be a higher volume of calls, and an increase in email and social media contact.

- (iv) not close for an unreasonable length of time or frequency, applying to both planned and unplanned closures. Unreasonable length/frequency will be determined by UR considering the following (non-exhaustive) factors: the industry standard for closures for the time period in question (in the UK/RoI); actual length of time a supplier's call centre was closed over the time period in question; frequency of closures over a rolling 12 month period; whether timely notification was provided to customers regarding the closure dates; whether the closure caused significant customer detriment; and KPI performance for the months surrounding the time period.

**Measure 7: Consumers must be able to reach their supplier's customer contact centre easily without experiencing an excessive call wait time to speak to an operative (not over an average wait time of four minutes).**

**In order to fulfil this requirement, suppliers must:**

- (i) ensure that average call wait times not be over four minutes, this is calculated on a monthly basis by each supplier. The average call wait time threshold will be regularly reviewed by UR and, from time to time when appropriate, may be adjusted to drive continuous improvement.

**Measure 8: Customer contact centre operatives must be adequately trained to ensure they can provide accurate and consistent information to consumers.**

**In order to fulfil this requirement, suppliers must:**

- (i) provide the appropriate level of training and oversight. This will include initial training for new employees, vulnerability circumstances identification training, ongoing review of training needs and adequacy of training, refresher training for all employees as needed and additional training when there are any changes to internal systems and processes for all their contact centre operatives to ensure they have the skills and knowledge to provide consistent and accurate information to all consumers (including those consumers in vulnerable circumstances).
- (ii) have a process in place to allow redirection of the customer during the call to another contact centre operative who can deal with the query if a contact centre operative is unable to provide the information that the customer requires in the first instance. This must include the option for the contact centre operative to escalate the call to a specialist member of the team for more complex cases. If customers are passed over to alternative contact centre operatives, this must be done via a 'warm handover' with no



requirement for the customer to call back. If a customer is not satisfied with the information provided by a contact centre operative and they consider that their issue has not been adequately resolved, then the customer must be able to escalate their issue, for example to a manager.

**Measure 9: Call back services must be offered by all suppliers and acted upon within two working days.**

**In order to fulfil this requirement, suppliers must:**

- (i) offer a call back service for all domestic customers.

**The call back service must:**

- a) state the timeline in which the customer can expect to receive a call back<sup>1</sup>. This must be no more than two working days from the initial contact.
- b) have adequate processes and resources in place to facilitate the operation of a call back facility within the timelines indicated by them.
- c) make at least three separate call back attempts if the supplier has been unable to reach the customer. The call back attempts should be spread out across different times of the day. The contact must also be in line with the customer's preferred means of contact.

**Measure 10: Suppliers must ensure that their call abandonment rate is not excessive (not above 12.5%).**

**In order to fulfil this requirement, suppliers must:**

- (i) ensure their customer service call abandonment rate not be above 12.5%. Call abandonment rate is number of customers who end their call before it is answered by the supplier's customer contact centre divided by all inbound calls including in-hours, and emergency number calls. The abandonment rate threshold will be regularly reviewed by UR and, from time to time when appropriate, may be adjusted to drive continuous improvement.

**Measure 11 - A customer's call must never be disconnected when they contact their supplier during their customer contact centre operating hours (apart from circumstances outside of the supplier's control).**

**In order to fulfil this requirement, suppliers must:**

- (i) never intentionally end or 'drop' a call with a customer. The only exception is when it is a result of circumstances outside of the supplier's control, such as

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<sup>1</sup> A call back is where the supplier provides an option for the customer to choose that the supplier will call them back (and return their call).

the customer's phone signal or in those instances where the customer is being abusive or threatening to the call centre operative.

- (ii) ensure that their customer contact centre systems do not allow for calls to be cut off even after longer wait times.

**Measure 12 - Written customer contacts (all mediums of written contact with consumers including webchat, social media platforms and emails but excludes postal correspondence) must receive timely responses within a maximum of two working days.**

**In order to fulfil this requirement, suppliers must:**

- (i) provide an automatic receipt to customers who contact them by email, webchat, social media and online message platforms. This automatic response must outline alternative contact methods and, as a minimum, expected timelines for response. For correspondence received by post, a reply must be issued by the supplier to the customer within two working days (but not received by the customer within two working days).
- (ii) within two working days: provide a further response to close out the query or provide an update to the customer. If the query cannot be resolved within 2 working days a timeline must be provided to the customer at the earliest opportunity and must be within two working days of the customer initially contacting the supplier<sup>2</sup>.
- (iii) provide updates (if the query cannot be resolved within the initial two working days) to the customer every two working days (as a minimum) until the query is satisfactorily resolved.
- (iv) ensure that all social media platforms be included in the requirement for a timely response as this medium of contact is being used by more consumers (where it is available) and as such we have updated the requirement to include this.
- (v) have documented processes in place to ensure that a consistent approach is taken for acknowledgement of receipt for all consumers across all written platforms.

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<sup>2</sup> Where a written contact falls within the category of a written complaint under the supplier's Code for Complaints Handling, the timeframes contained within the CoP Standards on Complaints Handling Procedure will apply. We will continue to monitor suppliers' activities and response times under both CoPs and may make recommendations for changes to response times if there is supporting evidence to deem it necessary.

## Resolving Disputes

Where a customer has a complaint related to an electricity/gas supplier's delivery of this CoP, then that customer should initially follow the supplier's complaints handling procedure.

Customers must also be informed of their right to seek help from the Consumer Council in the event that they do not feel that their complaint has been resolved sufficiently with their supplier.

## Compliance Reporting

Each licensee must keep (and ensure that any representative keeps) a record of its compliance with its obligations under this CoP to ensure the Statement of Licence Compliance return can be completed.

Where a licensee has evidence of another licensee being potentially non-compliant with this CoP, then UR should be informed. UR shall assess the complaint and consider the most appropriate course of action to be taken, including any breach of relevant licence conditions.

Each licensee must provide to UR, in such manner and at such times as UR may reasonably require, such information as UR may deem necessary or appropriate to enable it to monitor the licensee's compliance with this CoP.