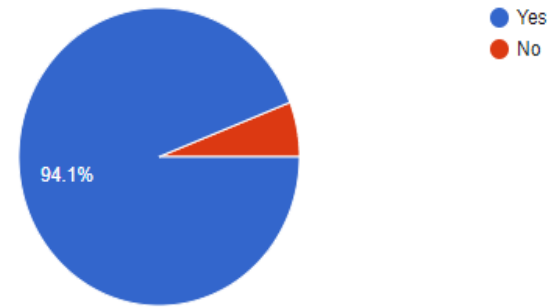


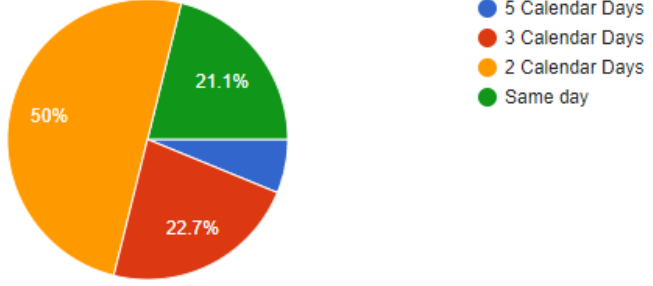
Energy Supplier rating Consultation on new customer service metrics and other updates – Utility Point	
Q1: Do you agree with our proposal to include email as a customer service metric?	Yes, we do.
Q2: Do you agree with our proposal to use percentage response time (within a certain number of days) as our measure of supplier performance?	Yes, we do.
Q3: Do you agree with our proposal to measure response time to subsequent emails from consumers, following supplier responses, and to exclude response time to secondary messages?	Yes, we do.
Q4: Please share any relevant research you are aware of on customer expectations of email response time.	<p>We reached out to 15,000 of our customers with a 5 questions survey to ascertain what they see as important and their expectations from a supplier would be. In total we received 2,404 responses which gave us a healthy 16% response rate.</p> <p>As you can see from our first question</p> <p>Do you see Email as an important method for you to get in contact with us? Of which 94.1% replied stating email is an important method for getting in contact with us.</p> <p>See below:</p>

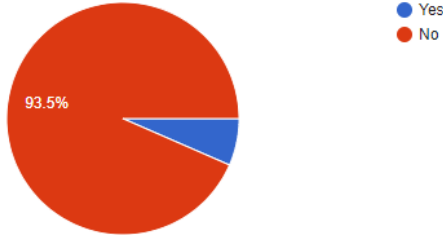
## Communication via Email

Do you see Email as an important method for you to get in contact with us?

2,404 responses



	<p>What do you see as an acceptable timeframe to receive a response to an email?</p> <p>2,404 responses</p>  <table border="1"> <thead> <tr> <th>Response Timeframe</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>5 Calendar Days</td> <td>5.2%</td> </tr> <tr> <td>3 Calendar Days</td> <td>22.7%</td> </tr> <tr> <td>2 Calendar Days</td> <td>50%</td> </tr> <tr> <td>Same day</td> <td>21.1%</td> </tr> </tbody> </table>	Response Timeframe	Percentage	5 Calendar Days	5.2%	3 Calendar Days	22.7%	2 Calendar Days	50%	Same day	21.1%
Response Timeframe	Percentage										
5 Calendar Days	5.2%										
3 Calendar Days	22.7%										
2 Calendar Days	50%										
Same day	21.1%										
Q5: Do you have any further comments on our proposal to include email as a customer service metric?	<p>As you can see the data from to our recent customer survey, over 94% of our customers responded overwhelmingly that they see emails as an important method of communication to contact us. In response to what is an acceptable response time 21.1% of our customers surveyed would like a same day response with 50% happy with a two day response and lastly 22.7% saying a response within three days would be acceptable. Therefore, we believe emails should be included as a performance metric.</p>										
Q6: Do you agree with our proposal to include social media as a customer service metric?	<p>No, we don't, please see our survey response showing a huge 93.5% of our customers don't see Social media as an important method for them to get in contact with us.</p>										
Q7: Do you agree with our proposal to measure Facebook and Twitter contacts, and to only measure direct messages?	<p>No, we don't please see our concerns on data verification and privacy.</p>										
Q8: Do you agree with our not to make social media a mandatory contact channel, but to penalise suppliers who have a presence on social	<p>No, we don't.</p>										

media but do not respond to customer queries via this channel?							
Q9: Do you agree with our proposal to change the wording around 'answered substantively' in our information request?	No as its not definitive and open to conjecture.						
Q10: Please share any relevant research you are aware of on customer expectations of social media response time.	<div>Communication via Social Media</div> <p>Do you see Social media (i.e. Facebook ,Twitter ) as an important method for you to get in contact with us?</p> <p>2,404 responses</p>  <p>A pie chart with a legend. The legend shows a blue circle for 'Yes' and a red circle for 'No'. The chart is mostly red, with a small blue slice. The red slice is labeled '93.5%'.</p> <table border="1"> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>6.5%</td> </tr> <tr> <td>No</td> <td>93.5%</td> </tr> </tbody> </table>	Response	Percentage	Yes	6.5%	No	93.5%
Response	Percentage						
Yes	6.5%						
No	93.5%						
Q11: Do you have any further comments on our proposal to include social media as a customer service metric in the rating?	<p>We believe there are too many unanswered questions around privacy and data protection and suppliers not wishing to have social media used as a metric would be penalised unfairly due to wishing to be compliant with Data protection concerns. The potential risk is too high.</p> <p>Plus, the effectiveness of being able to verify a customer via social media is indeed that customer and is who they say they are would only have us direct them to more secure communication platforms for verification purposes, and this then defeats the purpose of social media as a suitable stable method of</p>						

customer communication, it would then add delays not only for the customers original query and then internally wastes company resource.

Please note:

Facebook revealed in April 2018 that it's scanning users' Messenger conversations – including text chats, pictures, and links – in an effort to ensure that people play by its rules.

CEO Mark Zuckerberg first spilled the beans in [an interview with Vox's Ezra Klein](#), in which he brought up an incident surrounding ethnic cleansing in Myanmar, and explained that the company's systems "detect what's going on" when people try to send sensational messages via Messenger, and Facebook "stops those message from going through."

#### [FIND OUT MORE](#)

The company [told Bloomberg](#) that it analyses Messenger conversations the same way it does with public content on the social network, with a view to prevent abuse. Messages that are flagged for violating Facebook's community standards are read by moderators, who can then block or take them down if needed.

A spokeswoman said:

*"For example, on Messenger, when you send a photo, our automated systems scan it using photo matching technology to detect known child exploitation imagery or when you send a link, we scan it for malware or viruses. Facebook designed these automated tools so we can rapidly stop abusive behaviour on our platform."*

The revelation will rightly irk many users of the platform who may have previously believed that Messenger was truly private. For what it's worth, the company says it doesn't analyse chats to gather data that it can sell to advertisers.

While it's easy to say this is just another reason to ditch Facebook, it's worth considering how the lack of oversight on such communication platforms could be harmful.

In India, where Facebook-owned WhatsApp counts [more than 200 million users](#) on its encrypted messaging service, fake news, political propaganda, and other forms of misinformation [frequently spread like wildfire](#) as they do the rounds in chat groups.

The news follows [Facebook's recent privacy scandal, which saw some 87 million users' personal information scooped up without their knowledge by a data analytics firm](#). [Some 560,000 users in India](#) were among those millions, having being roped in by just 335 people who used a quiz app called 'thisisyourdigitallife' between 2013 and 2015. In light of these incidents, Facebook went so far as to say that [most of its two billion users should assume that their data has been compromised](#) in some way.

So, should you ditch Messenger? If you're only looking to chat with people you know, you have a bunch of options to choose from that are more private, including Signal and Telegram. But if you use Facebook to make friends with people on the platform, just know that your conversations are being monitored.

**Update (April 6, 2018):** Facebook issued the following statement concerning its scanning of Messenger conversations:

*Keeping your messages private is the priority for us, we protect the community with automated systems that detect things like known images of child exploitation and malware. This is not done by humans. We do not listen to your voice and video calls.*

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This creates a massive Data protection issue which only causes us serious concerns, and can we all confirm that the data exchanged on social media stays in the UK?

We believe this is highly unlikely and needs investigation to confirm this.

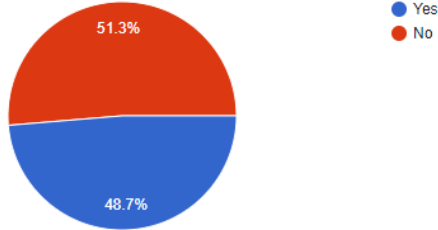
This has the potential for multiple Data protection issues and breaches and the possibilities of the ICO investigating and then possibilities of companies being fined, and fines nowadays are much more substantial.

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This means that a breach is more than just **losing** personal data.

**So therefore, what penalties can the Information commissioner issue?**

The Information Commissioner has the power to issue a monetary penalty for an infringement of the provisions of Part 3 of the Act – Law Enforcement Processing. Any penalty that they issue is intended to be effective, proportionate and dissuasive, and will be decided on a case by case basis.

	<p>Under Part 6 of the Act, there are two tiers of penalty for an infringement of Part 3 - the higher maximum and the standard maximum.</p> <p><b>What is the higher maximum?</b></p> <p>The higher maximum amount, is <u>20 million Euros</u> (or equivalent in sterling) or <u>4%</u> of the total annual worldwide turnover in the preceding financial year, whichever is higher.</p> <p>In practice, the higher maximum amount can apply to any failure to comply with any of the data protection principles, any rights an individual may have under Part 3 or in relation to any transfers of data to third countries.</p> <p><b>What is the standard maximum?</b></p> <p>If there is an infringement of other provisions, such as administrative requirements of the legislation, the standard maximum amount will apply, which is <u>10 million Euros</u> (or equivalent in sterling) or <u>2%</u> of the total annual worldwide turnover in the preceding financial year, whichever is higher.</p> <p>Even Failing to notify a breach when required to do so can result in a significant fine up to <u>10 million Euros</u> or <u>2 per cent</u> of a company's global turnover.</p> <p>.</p> <p>You are placing a perceived pressure on suppliers to engage on social media and therefore open them to additional risks from data breaches.</p>
Q12: Do you agree with our proposal not to include webchat as a customer service metric at this stage, but to keep it under review as part of future iterations of the rating?	No, we don't, we believe it should be included in the customer service metric before social media is.

	<p><b>Communication via Web Chat</b></p> <p>Do you see Web Chat as an important method for you to get in contact with us?</p> <p>2,404 responses</p>  <table border="1"> <thead> <tr> <th>Response</th> <th>Percentage</th> </tr> </thead> <tbody> <tr> <td>Yes</td> <td>48.7%</td> </tr> <tr> <td>No</td> <td>51.3%</td> </tr> </tbody> </table>	Response	Percentage	Yes	48.7%	No	51.3%
Response	Percentage						
Yes	48.7%						
No	51.3%						
Q13: Do you have any further comments on webchat as a customer service metric?	<p>We believe Webchat is a much more secure method of communication platform and which allows our customers in real time to contact us and enables us to assist and answer customers enquiries to completion on the high majority of times. We therefore would suggest webchat supersedes social media to be used in the supplier performance metric as more investigation needs to be researched on the social media metric in relation to exchange and verification of customer data privacy.</p> <p>Webchat could be measured on the same thresholds as maybe emails – one or two days etc and so on. Just really simple, no need to overthink.</p>						
Q14: Do you agree with our proposal not to include telephone ring backs and telephone abandonment rates as customer service metrics?	<p>Yes, we do.</p>						
Q15: Do you agree with our proposal for incorporating the new customer service metrics into the rating?	<p>No, due to our concerns over privacy issues with social media inclusion.</p>						



Q16: Do you agree with our proposal to include the Energy UK Vulnerability Code of Practice in the rating?	Yes, we do.
Q17: Do you have any comments on the broader role of the Company Commitments element of the star rating?	We as a new supplier are initially penalised for not being members of the Energy switch guarantee and we have made our initial enquiries to Energy UK. This isn't an overnight fix and as you are aware will take many months of audit submissions and costs to meet the criteria.
Q18: Do you have any comments on the opportunity to dispute the reports from the Energy Ombudsman in the star rating processes?	To our knowledge we do not receive a report to advise how many complaints we receive per month, quarterly from the Ombudsman to check and validate against what is shown within the report. We receive invoices however, this means we have to go through the portal to search and we cannot do a search by date complaints received. It would be helpful if we received a report monthly or even quarterly to provide a breakdown on how many complaints received, if these are 8 weeks or letter of deadlock, also if these have found in favor of us or the customer. This will enable us to better analyse trends etc.
Q19: Do you have any comments on the proposal to align the star rating measure of switching timeliness with Ofgem's proposals?	No comments other than we agree with the switching timeliness with Ofgem's proposals
<p>Additional comments:</p> <p>We also asked our customer:</p> <p>What would their preferred use of communication be to contact us? Note this was multiple choice.</p>	

## Communication preference

What would your preferred use of communication be to contact us?

2,404 responses

