

# Audit of energy supplier signposting to the Citizens Advice consumer service and Ombudsman Services: Energy

Report for Citizens Advice

Written by

Virginia Barstow

January 2015

Virginia Barstow Research, Hillside, Cheriton, Llanmadoc, Swansea SA3 1BY

Tel : 01792 386656 email : [virginiabarstow@virginia007.com](mailto:virginiabarstow@virginia007.com)

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## **About us**

On 1 April 2014, Consumer Futures (previously Consumer Focus) – the statutory representative for consumers of postal services across the United Kingdom, for energy consumers across Great Britain, and for water consumers in Scotland – became part of the Citizens Advice Service. Our responsibility for post in Northern Ireland transferred to the Consumer Council for Northern Ireland.

### **Citizens Advice Service in England, Wales and Scotland**

The Citizens Advice Service provides free, confidential, and impartial advice to help people resolve their problems. As the UK's largest advice provider, the Citizens Advice Service is equipped to deal with any issue, from anyone, spanning debt and employment to housing and immigration, plus everything in between. We value diversity, promote equality and challenge discrimination.

The service aims:

- to provide the advice people need for the problems they face
- to improve the policies and practices that affect people's lives
- to ensure that individuals do not suffer through ignorance of their rights and responsibilities, or of the services available; or through an inability to express their needs
- to exercise a responsible influence on the development of social policies and services, both locally and nationally.

Citizens Advice Bureaux deliver advice services from over 3,500 community locations in England and Wales, run by 382 independent registered charities. Citizens Advice itself is also a registered charity, as well as being the membership organisation for these 382 member bureaux. In Scotland, 61 Citizens Advice Bureaux help over 250,000 clients with over half a million new problems every year. More than 2,200 trained volunteers and 600 paid staff ensure that thousands of people in Scotland receive vital advice every day.

## 1.0 EXECUTIVE SUMMARY

### Background to the project

In autumn 2013, Virginia Barstow was commissioned to conduct an audit on behalf of Consumer Futures to look at the quality of the signposting to the Citizens Advice consumer service and Ombudsman Services: Energy, for customers wishing to complain about their energy service provider.

The following communications were requested for audit from each supplier:

- websites
- quarterly cash cheque (QCC) bills, direct debit (DD) statements and pre-payment meter (PPM) statements
- annual statements
- unilateral contract variation notices
- supply contracts
- complaints leaflets/booklets

Not every supplier sent every document for audit. Some suppliers do not currently have all three types of customer (QCC, DD and PPM). Some suppliers were in the process of creating documents, or had yet to design them under the Retail Market Review (RMR)<sup>1</sup> rules.

The initial audit in 2013 showed that there was a lot of room for improvement for many suppliers.

Following the audit, each supplier was issued with a summary of their own audit findings, with clear recommendations on how they could improve their scores. A follow-up audit was conducted in the autumn of 2014 to see whether suppliers had taken up the recommendations made after the first audit to enable them to improve the quality of their signposting for consumers wishing to make a complaint.

### Key findings and conclusions

Citizens Advice regularly publishes an energy supplier performance league table, which provides relative energy company performance on complaints.<sup>2</sup> In 2013, Citizens Advice became increasingly aware of the need to ensure a level playing field for published statistics for those suppliers appearing in the performance league table through establishing the level of variance across the signposting of energy suppliers' approaches, and identifying good and poor practice. This was in part driven by the fact that some suppliers were expressing concern that better signposting resulted in more complaints, which reflected badly on those companies who were making it easier for customers to complain.

The initial audit of energy suppliers, which was conducted in October and November 2013, revealed that there were inconsistencies across domestic suppliers as to how well signposting to the Citizens Advice consumer service and Ombudsman Services: Energy appeared on their websites and other

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<sup>1</sup> <https://www.ofgem.gov.uk/gas/retail-market/market-review-and-reform/retail-market-review>

<sup>2</sup> [http://www.citizensadvice.org.uk/index/aboutus/consumer-work/energy\\_supplier\\_performance.htm](http://www.citizensadvice.org.uk/index/aboutus/consumer-work/energy_supplier_performance.htm)

forms of communications sent to their customers. In February 2014, all energy suppliers were given detailed reports showing how they could improve their signposting.

The follow-up audit, conducted in the autumn of 2014, showed there had been inconsistent progress amongst suppliers. Several suppliers scored particularly poorly with their supply contracts and unilateral contract variation notices, and scores were also poor for the pre-payment meter statements issued by some suppliers. There was room for improvement amongst all suppliers when it came to websites; these being a particularly important source of information for customers seeking advice about contacting the right organisation for help or assistance about making a complaint.

It is little surprise that so many consumers go straight to Ombudsman Services: Energy rather than consulting the Citizens Advice consumer service first. Few suppliers make it clear that customers should generally approach the Citizens Advice consumer service if they require independent advice before contacting Ombudsman Services: Energy if they have not yet made a complaint, or are at an early stage of the complaints process with their energy supplier. Ombudsman Services: Energy could also make this point clearer on its own website. Since Ombudsman Services: Energy is unable to assist customers who are outside its terms of reference, it is vital that consumers are directed to the most appropriate organisation in the first instance.

## The findings in more detail

A summary table showing the communications audited, and the audit scores, is shown below.

**Table 1: Highest, lowest, average and median scores achieved**

	<b>Out of</b>	<b>Highest</b>	<b>Lowest</b>	<b>Average</b>	<b>Median</b>
<b>Websites 2013</b>	131	110	0	75 (57%)	80 (61%)
<b>Websites 2014</b>		124	54	90 (69%)	88 (67%)
<b>QCC bills 2013</b>	70	63	0	41 (58%)	50 (71%)
<b>QCC bills 2014</b>		70	17	53 (76%)	58 (83%)
<b>DD statements 2013</b>	70	63	15	45 (64%)	50 (71%)
<b>DD statements 2014</b>		70	15	51 (73%)	55 (79%)
<b>PPM statements 2013</b>	70	63	0	42 (60%)	43 (61%)
<b>PPM statements 2014</b>		70	5	44 (63%)	51 (73%)
<b>Annual statements 2013</b>	26	24	2	18 (69%)	22 (85%)
<b>Annual statements 2014</b>		26	14	21 (81%)	21 (81%)
<b>Unilateral contract variation notice 2013</b>	29	25	0	10 (34%)	0 (0%)
<b>Unilateral contract variation notice 2014</b>		29	0	16 (55%)	17 (59%)
<b>Energy supply contract 2013</b>	75	63	0	13 (17%)	0 (0%)
<b>Energy supply contract 2014</b>		75	0	35 (47%)	29 (39%)
<b>Complaints leaflet 2013</b>	61	54	0	39 (64%)	49 (80%)
<b>Complaints leaflet 2014</b>		61	17	44 (72%)	42 (69%)

Table 1 shows the following:

- The maximum a supplier could have scored (see appendix for full details of the scoring system)
- Highest scores achieved
- Lowest scores
- The average score (all scores added up and divided by the number of suppliers) and also shown as a percentage of the maximum score
- The median score (the middle score when all scores have been ranked in order – for example, if there are 19 scores, the median score is the score of the supplier who came 10<sup>th</sup> in the ranking) and also shown as a percentage of the maximum score

Although average scores have improved for all documents, levels of improvement were disappointing. Given that suppliers were told exactly how they could improve their documents, and therefore their audit scores, the levels of improvement shown in the second audit might have been anticipated to be higher. But even though suppliers were changing their bills throughout this period

in order to be compliant with RMR, and therefore had an opportunity to incorporate the changes recommended after the last audit, it seems that some of them made little effort to do so.

Some suppliers' scores dropped between the two audits – generally because contact details for the Citizens Advice consumer service or the 'Know Your Rights' document had not been updated. Suppliers were advised that it was acceptable to use up existing copies of old print stock of the 'Know Your Rights' document within a reasonable timeframe and were not penalised if they had stated that this was the case.<sup>3</sup>

Table 2 shows whether suppliers had increased or decreased their score for websites and all types of documentation since the 2013 audit. A white square indicates that the supplier did not supply the document, generally because the supplier did not have QCC, DD or PPM customers, because they had yet to create a template for that type of document, or because they were in the process of changing the template.

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<sup>3</sup> To avoid reprint costs regarding the change to the text on the back of bills.

**Table 2: Change in score for each supplier across website/document type**

	Website	QCC bill	DD statement	PP statement	Annual statement	Unilateral contract variation	Supply contract	Complaints booklet
<b>British Gas</b>	+	+	+	+	-	Not supplied '14	+	+
<b>Co-operative Energy</b>	-	-	-	Not supplied '13	-	+	-	Not supplied '13
<b>Economy Energy</b>	+	Not supplied '14	Not supplied '13/14	+	+	Not supplied '13/14	Not supplied '13/14	+
<b>Ecotricity</b>	+	+	+	+	Not supplied '13	-	+	+
<b>EDF Energy</b>	+	+	+	+	+	+	+	+
<b>e.on</b>	+	+	+	+	-	Same score	-	-
<b>First Utility</b>	-	Not supplied '13	+	Not supplied '13	+	+	+	Not supplied '13
<b>Flow Energy</b>	-	Not supplied '13/14	-	Not supplied '13/14	Not supplied '13	Not supplied '13	Same score	-
<b>Good Energy</b>	+	+	Not supplied '13	Not supplied '13	Not supplied '13	Not supplied '13/14	+	Not supplied '13
<b>Green energy</b>	+	-	-	-	+	Same score	+	+
<b>Green Star</b>	-	Not supplied '13	Not supplied '13	Not supplied '13/14	Not supplied '13/14	Not supplied '13	Not supplied '13	Not supplied '13
<b>iSupplyEnergy</b>	-	Not supplied '13/14	+	Not supplied '13/14	+	+	+	Not supplied '13
<b>LoCO2</b>	-	+	+	Not supplied '13/14	+	+	+	+
<b>npower</b>	-	+	+	+	+	-	+	-
<b>Ovo</b>	-	Not supplied '14	Same score	Not supplied '14	Not supplied '14	+	+	Same score
<b>Scottish Power</b>	+	+	+	+	-	Same score	+	+
<b>Spark</b>	+	+	+	+	-	+	+	Not supplied '13
<b>SSE</b>	+	+	+	-	-	-	-	+
<b>Utilita</b>	-	-	-	-	-	Same score	+	-
<b>Utility Warehouse</b>	+	+	Not supplied '13/14	Not supplied '13/14	Not supplied '14	+	+	+



Only 4 out of the 20 suppliers increased all of the scores on all the documents sent in for audit and for their website, though it should be said that 3 of those 4 did not send a full set of documents for audit.

EDF Energy stands out as the supplier that had improved on its scores across the board to achieve maximum scores in all of the documents provided for audit, together with a very good score for the company's website.

The fact that so many suppliers suffered a decline in scores suggests that most of the recommendations made after the first audit were largely ignored by some suppliers.

There was a wide variation in scores across all types of communication audited during both audits. The highest scores were at a reasonable level, but large proportions of suppliers did badly on all types of communication, and on two of the eight types of communication at least one supplier scored no points at all.

2014 audit scores are shown in the table below. The abbreviation 'ns' indicates that the supplier did not submit a document for audit. A full score is shown in green and a score of zero is shown in red.

**Table 3: Summary of supplier scores 2014**

	Website	QCC bill	DD statement	PP statement	Annual statement	Unilateral contract variation	Supply contract	Complaints booklet
<b>Max score</b>	<b>131</b>	<b>70</b>	<b>70</b>	<b>70</b>	<b>26</b>	<b>29</b>	<b>75</b>	<b>61</b>
<b>British Gas</b>	108	<b>70</b>	<b>70</b>	<b>70</b>	21	ns	22	<b>61</b>
<b>Co-operative Energy</b>	54	51	51	15	17	15	<b>0</b>	22
<b>Economy Energy</b>	84	ns	ns	5	19	ns	ns	37
<b>Ecotricity</b>	91	65	65	65	<b>26</b>	15	5	27
<b>EDF Energy</b>	121	<b>70</b>	<b>70</b>	<b>70</b>	<b>26</b>	<b>29</b>	<b>75</b>	<b>61</b>
<b>e.on</b>	99	58	58	58	21	10	41	42
<b>First Utility</b>	109	37	37	37	<b>26</b>	17	15	47
<b>Flow Energy</b>	82	ns	50	ns	19	20	5	39
<b>Good Energy</b>	84	17	17	17	17	ns	5	44
<b>Green Energy</b>	84	53	53	53	<b>26</b>	<b>0</b>	43	29
<b>Green Star</b>	96	60	60	ns	ns	<b>0</b>	65	47
<b>iSupplyEnergy</b>	103	ns	63	ns	<b>26</b>	24	70	54
<b>LoCO2</b>	59	65	65	ns	<b>26</b>	27	37	56
<b>npower</b>	76	53	53	53	21	20	70	42
<b>Ovo</b>	64	ns	15	ns	ns	15	15	17
<b>Scottish Power</b>	116	58	58	58	14	25	60	57
<b>Spark</b>	89	25	25	25	19	17	29	32
<b>SSE</b>	124	65	65	50	21	17	15	56
<b>Utilita</b>	74	41	41	41	19	<b>0</b>	20	44
<b>Utility Warehouse</b>	87	65	ns	ns	ns	27	65	<b>61</b>

In both audits, scores achieved were higher for websites, bills, complaints leaflets and annual statements than for unilateral notifications of contract variation and energy supply contracts. This was a positive finding, given that bills and, to a lesser extent, websites are the most frequently used sources of reference for finding information and contact details for customers wishing to make a complaint. However, there is still room for improvement on the websites of all suppliers.

The six larger energy suppliers, with the exception of npower, tended to feature towards the top of the tables when it came to scoring, but some of the smaller and newer entrants to the energy supply market achieved good scores in all of the areas audited, most notably iSupplyEnergy, which appears in seventh place or above for every document submitted for audit.

Table 4 shows the ranking of suppliers for websites and for each type of document.

**Table 4: Ranking of suppliers (first place in green, last place in red)**

Rank	Website	QCC bill	DD statement	PP statement	Annual statement	Unilateral contract variation notification	Supply contract	Complaints booklet
1	SSE	British Gas EDF Energy	British Gas EDF Energy	British Gas EDF Energy	Ecotricity EDF Energy First Utility Green Energy iSupplyEnergy LoCO2	EDF Energy	EDF Energy	British Gas EDF Energy U. Warehouse
2	EDF Energy					LoCO2 U. Warehouse	iSupplyEnergy npower	
3	Scottish Power	Ecotricity LoCO2 SSE U. Warehouse	Ecotricity LoCO2 SSE	Ecotricity				
4	First Utility			e.on Scottish Power		Scottish Power	Green Star U. Warehouse	Scottish Power
5	British Gas					iSupplyEnergy		LoCO2 SSE
6	iSupplyEnergy		iSupplyEnergy	Green Energy npower		Flow Energy npower	Scottish Power	
7	e.on	Green Star	Green Star		British Gas e.on npower SSE		Green Energy	iSupplyEnergy
8	Green Star	e.on Scottish Power	e.on Scottish Power	SSE		First Utility Spark SSE	e.on	First Utility Green Star
9	Ecotricity			Utilita			LoCO2	
10	Spark Energy	Green Energy npower	Green Energy npower	First Utility			Spark	Good Energy Utilita
11	U. Warehouse			Spark	Econ. Energy Flow Energy Spark Energy Utilita	Co-op Energy Ecotricity Ovo	British Gas	
12	Econ. Energy Good Energy Green Energy	Co-op Energy	Co-op Energy	Good Energy			Utilita	e.on npower
13		Utilita	Flow Energy	Co-op Energy			First Utility Ovo SSE	
14		First Utility	Utilita	<b>Econ. Energy</b>		e.on		Flow Energy
15	Flow Energy	Spark	First Utility		Co-op Energy Good Energy	<b>Green Energy Green Star Utilita</b>		Econ. Energy
16	npower	<b>Good Energy</b>	Spark				Ecotricity Flow Good Energy	Spark
17	Utilita		Good Energy		<b>Scottish Power</b>			Green Energy
18	Ovo		<b>Ovo</b>					Ecotricity
19	LoCO2						<b>Co-op Energy</b>	Co-op Energy
20	<b>Co-op Energy</b>							<b>Ovo</b>

## **The Citizens Advice consumer service**

The autumn 2013 audit highlighted some confusion about the Citizens Advice consumer service, over a year after the name change. Some suppliers were still referring to the organisation as Consumer Focus or Consumer Direct.<sup>4</sup> This confusion seems to have largely disappeared by the later audit, though a small number of suppliers made references to both organisations on their websites and documents.

Ahead of the 2014 audit, suppliers were sent updated contact details for the Citizens Advice consumer service. A communication was sent out on 27th March 2014 with a copy of the 2014-15 checklist, and a follow-up email sent out on 19th June 2014 with the new 0345 number for the service. A disappointingly low number of suppliers had actually changed the contact details and in many cases, as has already been mentioned, the out-of-date details led to a reduction in the number of points scored in the audit. Some suppliers also included out-of-date contact details for Ombudsman Services: Energy. Suppliers need to make sure that all of the contact details provided for both the Citizens Advice consumer service and Ombudsman Services: Energy are current.

Suppliers were also sent an updated version of the 'Know Your Rights' document before the 2014 audit, which contained up-to-date contact details for the Citizens Advice consumer service. Again, not all suppliers had swapped the old version for the new one on websites and electronic correspondence (although suppliers were told that they could use up existing bill stock with the old 0845 phone number).

In some supplier documentation, the Citizens Advice consumer service is only mentioned in terms of offering advice about switching, despite suppliers being issued with a form of words for use on the back of bills and websites. Suppliers need to make sure that consumers know that the Citizens Advice consumer service is there to provide advice about making complaints, as well as about switching.

## **The consumer journey**

The websites of the Citizens Advice consumer service, Ombudsman Services: Energy and Energy UK (a trade association to which a small number of suppliers are affiliated) were also included in the audit, to see whether the three organisations offer a joined-up approach to consumers seeking advice about energy issues. This was not found to be the case. The Ombudsman Services: Energy website in particular made little reference to the Citizens Advice consumer service, and the organisation needs to make it much clearer that consumers can use the Citizens Advice consumer service if they require help or advice when they have a complaint about their energy provider; Ombudsman Services is only able to take up the complaint if the consumer has a deadlock letter or their complaint is over eight weeks old.

Where consumers need further advice or support on their complaint, it is little surprise that so many consumers go straight to Ombudsman Services: Energy rather than consulting the Citizens Advice consumer service first. Few suppliers make it clear that customers should generally approach the Citizens Advice consumer service before contacting Ombudsman Services: Energy if they wish to seek independent advice about a problem with an energy supplier. Since Ombudsman Services: Energy is unable to assist customers who are outside its terms of reference (OTOR), it is vital that consumers are directed to the most appropriate organisation - to suppliers to resolve the problem

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<sup>4</sup> Citizens Advice took over the Consumer Direct service in April 2012 and the name was changed at that point.

when the consumer is able to do so or to the consumer service when additional advice and support is needed. Some suppliers are failing to provide sufficient information about what the Citizens Advice consumer service can provide, how to contact it and at what stage to contact Ombudsman Services: Energy.

### **Audit feedback**

All suppliers have been issued with a report on the findings of the 2014 audit. As with the 2013 report, each supplier is given their own scores across each communication type, with detailed suggestions as to how they can bring their communications in line with Citizens Advice specifications.

## **2.0 INTRODUCTION AND OBJECTIVES**

### **2.1 Summary of the background to the research problem**

Citizens Advice regularly publishes an energy supplier performance league table, which provides relative energy company performance on complaints.<sup>5</sup> In 2013, Citizens Advice became increasingly aware of the need to ensure a level playing field for published statistics for those suppliers appearing in the performance league table through establishing the level of variance across the signposting of energy suppliers' approaches, and identifying good and poor practice. This was in part driven by the fact that some suppliers were expressing concern that better signposting resulted in more complaints, which reflected badly on those companies who were making it easier for customers to complain.

In Autumn 2013, Consumer Futures decided to commission an audit to establish the levels of variance across the quality of signposting by all energy suppliers to the Citizens Advice consumer service and Ombudsman Services: Energy. This aimed to identify good and poor practice, and to provide clear and actionable advice about how signposting could be improved.

The Citizens Advice consumer service provides consumers with free and impartial advice on their energy issues. Domestic and micro business<sup>6</sup> consumers can contact the organisation to seek help and advice in all matters connected with their energy supply, including switching supplier and making complaints.

Ombudsman Services: Energy is an independent redress scheme for domestic and micro business consumers wishing to make a complaint about their energy company.

Ofgem requires domestic energy suppliers to signpost their customers to both the Citizens Advice consumer service and Ombudsman Services: Energy at different stages of the customer journey and in a number of different locations, including websites, bills and other customer correspondence.

Over recent years there has been a decline in the number of calls to the Citizens Advice consumer service, and a decline in the proportion of energy customers who report having found details of the Citizens Advice consumer service on energy suppliers' websites (see Section 2.2). There has also been a rise in the number of calls to Ombudsman Services: Energy that are OTOR; in other words, consumers have been calling the organisation too early in the complaints process rather than contacting the Citizens Advice consumer service to seek advice at this stage (see Section 2.2).

Since the first audit there have been some dramatic changes to the trends in data observed in 2013, which are reported on in the next section.

### **2.2 The background to the research problem in more detail**

Since 2010, the proportion of consumers who report having found details of the Citizens Advice consumer service on their supplier's website has steadily declined. In 2010, 18.5 per cent of those who contacted the Citizens Advice consumer service had found the details of the organisation on the back of their bill, and 15.4 per cent on their energy supplier's website. In 2014, 19.9 per cent of

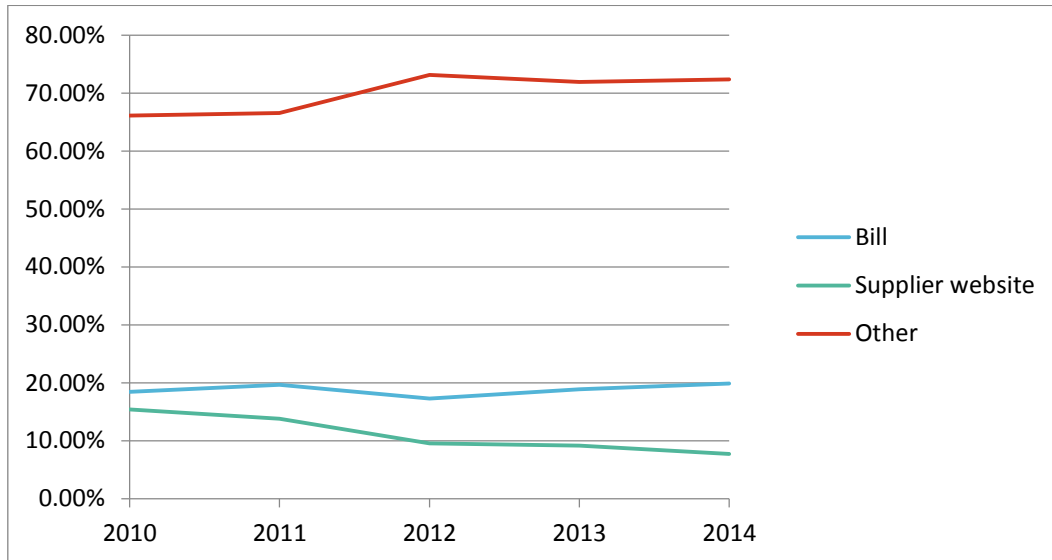
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<sup>5</sup> [http://www.citizensadvice.org.uk/index/aboutus/consumer-work/energy\\_supplier\\_performance.htm](http://www.citizensadvice.org.uk/index/aboutus/consumer-work/energy_supplier_performance.htm)

<sup>6</sup> <https://www.ofgem.gov.uk/information-consumers/business-consumers/key-terms-and-issues-explained?alpha=M>

consumers had found the details of the organisation on the back of their bill, but only 7.7 per cent had found the details on their supplier’s website.<sup>7</sup>

**Chart 1: Percentage of energy consumers finding details of the Citizens Advice consumer service on back of bills, websites and other sources**



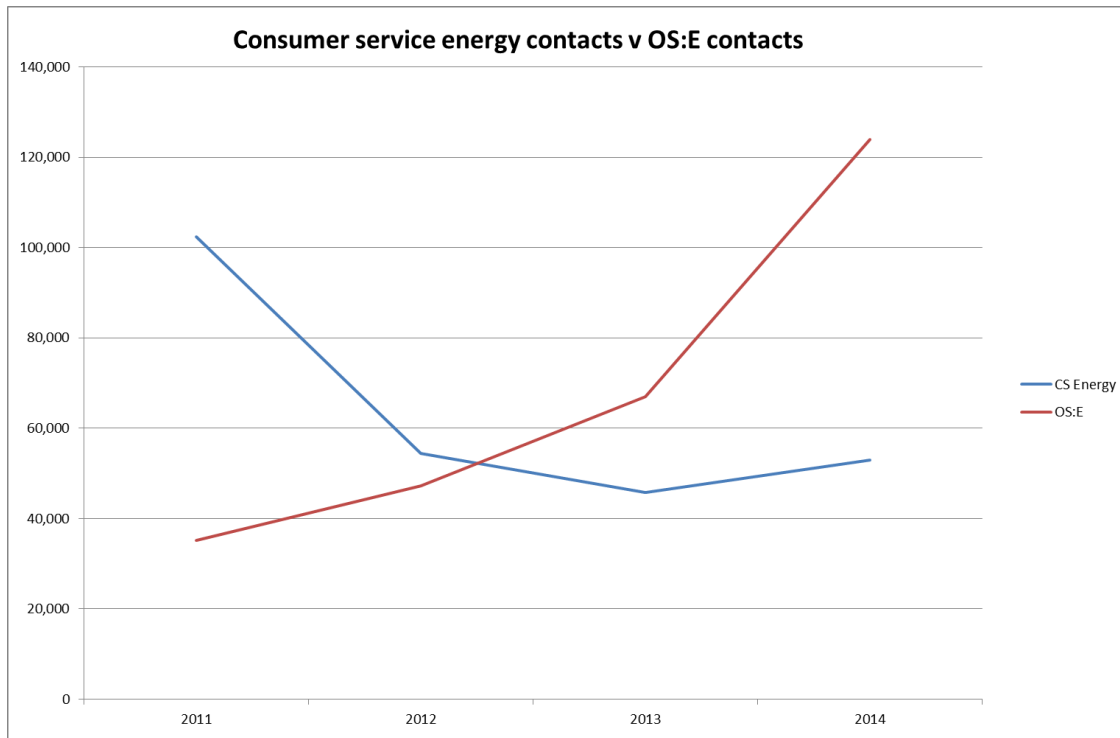
Up until the end of 2013, there had been a steady decrease in the number of contacts made by consumers to the Citizens Advice consumer service (previously called Consumer Direct) over the previous five years. The decrease was particularly rapid between 2011 and 2013. In 2011, 102,393 consumers contacted Consumer Direct regarding an energy issue. In 2012, 54,374 consumers contacted the Citizens Advice consumer service about energy issues, and in 2013 this figure dropped further to 45,720. By 2014, it had increased slightly to 52,928.

Meanwhile, the numbers of consumers contacting Ombudsman Services: Energy had increased dramatically. In 2011, 35,134 consumers contacted Ombudsman Services: Energy. This figure had risen to 47,238 in 2012, and had risen further to 67,021 in 2013.<sup>8</sup> In 2014, the number of calls to Ombudsman Services: Energy rocketed to 123,843 – more than triple the number of calls to the organisation in 2011.

<sup>7</sup> Data from the Citizens Advice consumer service

<sup>8</sup> Ombudsman Services: Energy

**Chart 2: Numbers of calls to the Citizens Advice consumer service (CS Energy) and Ombudsman Services: Energy (OS:E)<sup>9</sup>**



One of the causes for this increase in calls to Ombudsman Services: Energy was that three suppliers (Scottish Power, EDF Energy and npower) had implemented new IT systems and had experienced problems with migrating consumers' details from one system to another, which resulted in significant numbers of consumers receiving inaccurate bills, or no bills at all.

Additional causes for the recent increase in the number of calls could be the recent higher profile gained by the organisation, and a suggestion that consumers are felt to be more aware of their rights. According to Chief Ombudsman, Lewis Shand Smith:

*"The hike in complaints figures over 2014 suggests that consumers are becoming more aware of their rights and less willing to accept poor customer service. Additionally, with wholesale prices dropping, it is unsurprising that consumers are demanding a fairer deal with more transparency around pricing."*

The vast majority of consumers contacting Ombudsman Services: Energy in 2012 and 2013 were OTOR – 68.6 per cent of contacts in 2012 and 65.3 per cent in 2013.<sup>10</sup> In other words, consumers should not have contacted the organisation so early in the complaint process. This was a clear indication that many consumers were failing to understand when to approach Ombudsman Services: Energy for advice and when the Citizens Advice consumer service was the more appropriate organisation to seek advice from. This obviously has serious staffing implications for Ombudsman Services: Energy, has the potential to increase costs with double handling of calls, is frustrating for consumers and may mean that consumers fail to obtain advice when they need it.

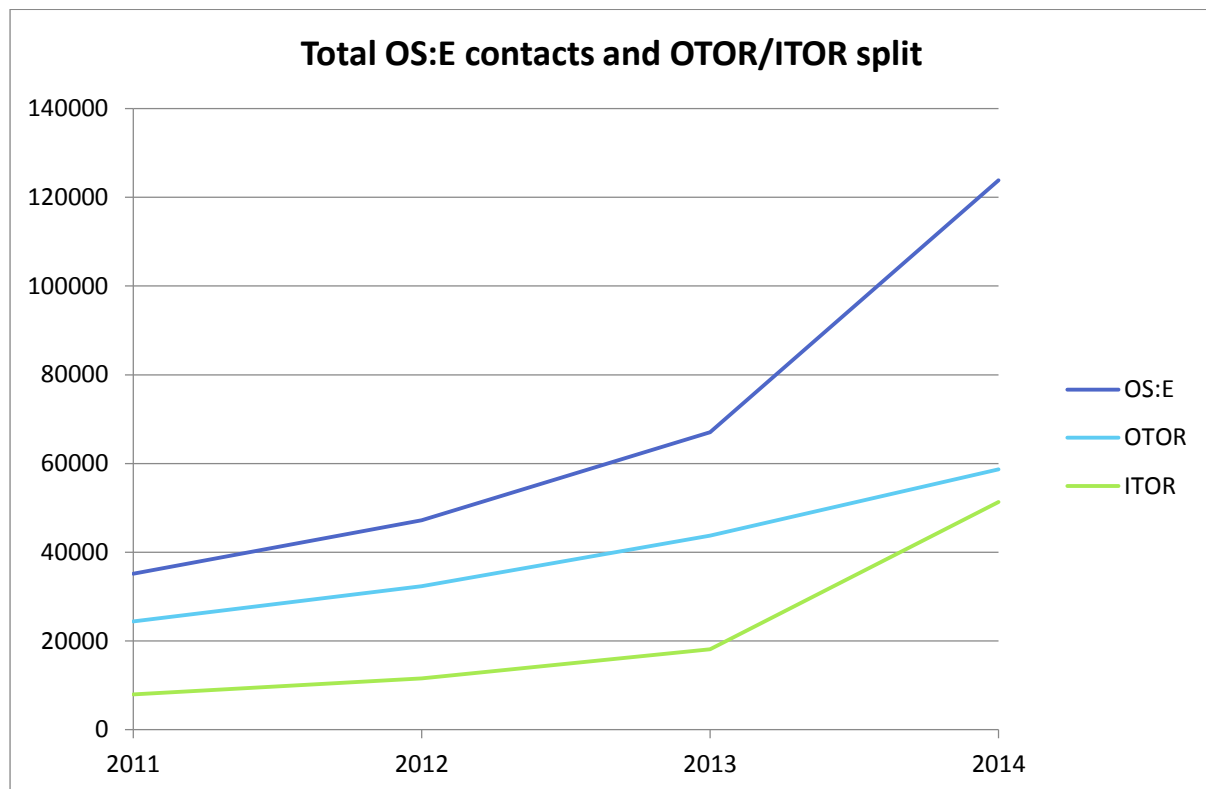
<sup>9</sup> Includes OTOR and ITOR figures

<sup>10</sup> Ombudsman Services: Energy sends Citizens Advice information about the number of contacts it receives



However, in 2014 there was a sharp increase in the percentage of calls that were deemed to be ‘in terms of reference’ (ITOR) – where consumers were right to have contacted the organisation when they did. The percentage of calls that were OTOR had decreased from 65.3 per cent in 2013 to 47.4 per cent in 2014, though it is worth pointing out that the number of calls that were OTOR had also shown an increase, albeit less dramatic than that of the ITOR calls.

**Chart 3: Total number of calls to Ombudsman Services: Energy (OS:E), and number of those calls that were ITOR and OTOR**



### 2.3 The need for an audit

In 2013, Consumer Futures became increasingly concerned that, despite guidance given in 2011 (in the form of a letter, which was entitled ‘Placement of Consumer Direct details on supplier websites’ and was emailed to all suppliers by Audrey Gallacher of Consumer Focus), the quality of signposting to both organisations was not consistent across suppliers. Given the number of new suppliers who had entered the market since 2011, Consumer Futures had become increasingly keen to expand its existing company performance league table to newer suppliers. In 2013, some suppliers approached Consumer Futures to complain that, since not all suppliers were signposting the third-party support organisations to the same degree, customers were more likely to complain about those suppliers whose signposting was good, which therefore reflected badly on those suppliers when relative complaint handling performance is published. Consumer Futures wanted to determine whether this was in fact having an impact on the number of contacts to the third-party organisations, so decided to commission an independent audit of the quality of signposting to the Citizens Advice consumer service and Ombudsman Services: Energy, across the industry.

The decline in the proportion of customers who reported having found details of the Citizens Advice consumer service on websites, the decline in the number of calls to the service between 2011 and 2013, and the rise in number of OTO calls to Ombudsman Services: Energy, together with the concern of some suppliers that not all suppliers were signposting third-party support organisations to the same degree, were clearly issues that needed investigation.

Virginia Barstow was commissioned to conduct an audit of energy suppliers' communications. A working party was formed to ensure that suppliers were represented in the audit process. The energy supply audit working party consisted of members of staff from Consumer Futures, Energy UK, EDF Energy, SSE and the auditor. The team met prior to the audit to discuss the audit process and to suggest points that it would be important for the auditor to cover. It was agreed that it would be important to rate all the points using a numerical scale to make the process as non-subjective as possible.

It was agreed that the auditing would include all domestic energy suppliers, excluding white-label sites,<sup>11</sup> as their complaints are included within the main brand. Extra Energy was launched in January 2014, but it was decided not to include the company within the 2014 audit process due to its small customer numbers at the time the audit was carried out.

Separately, Consumer Futures circulated an agreed form of words in July 2013 to be used by suppliers on the back of their bills and statements, to fulfil their requirements to signpost the Citizens Advice consumer service and the consumer checklist (known as the 'Know Your Rights' document). This was designed to save space on the back of the bill and avoid the need for two similar signposting messages. The description of the Citizens Advice consumer service was agreed by Citizens Advice, Citizens Advice Scotland and Ofgem, and was as follows:

*It's easy to get independent advice so that you "Know your rights" as an energy consumer. You might want to get a better deal, find out how to make a complaint, get advice about the quality of your electricity or gas supply, or ask for help if you're struggling to pay your bills. To "Know your rights", visit [www.citizensadvice.org.uk/energy](http://www.citizensadvice.org.uk/energy) for up to date information or contact the Citizens Advice consumer service on 08454 04 05 06.*

In March 2014, the description was modified to take account of the fact that the service is free for consumers to use, so that the initial sentence now reads: *"It's easy to get free independent advice so that you "Know your rights" as an energy consumer."*

Virginia Barstow commenced the audit process with an audit of websites, which took place at the end of October 2013. At the same time, suppliers were asked to provide as many of the following documents as they had available:

- Bill for quarterly cash/cheque (QCC) customers
- Statement of account for direct debit (DD) customers
- Statement of account for pre-payment meter (PPM) customers
- Annual statement
- Unilateral contract variation notices
- Energy supply contract
- Complaint handling leaflet/booklet

The audit of these documents took place during November 2013.

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<sup>11</sup> For example, Sainsbury's Energy

Once the audit had been completed, the working party met to agree on what criteria should be included in the scoring system and what weight each criterion should be given.

Virginia Barstow then scored each supplier across the different types of documentation and websites using the agreed scoring system. All suppliers were sent an individual report in spring 2014, which gave details of the supplier's scores for their website and for each document provided. This report also made detailed suggestions as to how the quality of the supplier's signposting could be improved.

In September 2014, Virginia Barstow was commissioned to conduct a second audit with the same energy suppliers, using the same scoring criteria, to see whether suppliers had adopted the recommended changes and were providing customers with better signposting to third-party support agencies.

Prior to the 2014 audit, the contact details for the Citizens Advice consumer service changed. All suppliers were given details of the new website address on 4 March 2014, and were given details of the new 0345 telephone number on 19 June 2014.

This report provides an overview of the findings of the two audits, with particular focus on how suppliers improved their performance between 2013 and 2014. In 2013, it was decided that it would be unfair to publish suppliers' scores since not all suppliers had been given advance notice of the criteria to be audited. However, since all suppliers were given detailed instructions as to how they could improve their scores after the 2013 audit, and were subsequently told exactly how points would be allocated in the second wave of auditing, it has been decided to publish scores for individual suppliers for the 2014 audit.

Throughout this report, the Ofgem regulatory requirements have been described in addition to the audit criteria. It is important to note that the Ofgem regulations are obligatory while the audit criteria are suggestions for good practice but are not a legal requirement.

It should also be noted that suppliers may have made changes to their bills, statements or websites since the 2014 audit was carried out during September and October 2014. This report, therefore, reflects a snapshot of suppliers' bills, statements and websites at the point of audit.

### 3.0 THE FINDINGS IN DETAIL

#### 3.1 Websites

The audit of websites formed the first section of the energy supplier signposting audit, and was conducted while waiting for documentation from suppliers. The first audit of websites took place at the end of October 2013. The second audit took place during the end of September 2014.

Ofgem regulations state that, in order to be compliant, a supplier must ensure that their complaints handling procedure appears on a clear and prominent location on their website. This requirement is subjective and therefore difficult to measure. However, at the initial working party meeting it was agreed that various aspects of the requirement should be included in the audit to give suppliers direction as to how they could ensure that their complaints handling procedure is located in a clear and prominent location on their website.

The criteria agreed on by the working party, and on which websites were subsequently audited, were as follows:

- Mention of the Citizens Advice consumer service and Ombudsman Services: Energy
- Number of clicks from the home page to the Citizens Advice consumer service and Ombudsman Services: Energy (two or fewer was deemed acceptable)
- Whether the word 'complaint' appears on the home page without moving the cursor, with moving the cursor or not at all
- Whether customers are taken immediately onto the complaints page if they enter the word 'complaint' into the search facility
- Whether the complaints procedure is described on the website itself or on a PDF document
- The existence of a dedicated complaints page on the website
- Details of the Citizens Advice consumer service and Ombudsman Services: Energy located on the complaints page
- Number of 'page downs' necessary to see details of the Citizens Advice consumer service and Ombudsman Services: Energy (two or fewer was deemed acceptable)
- The steps involved in the complaints procedure were outlined and included Ombudsman Services: Energy
- The Citizens Advice consumer service was mentioned before Ombudsman Services: Energy
- Link to the 'Know Your Rights' publication
- The Citizens Advice consumer service described as free and independent/impartial, and can be consulted at any stage in the complaints process
- Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after eight weeks and the decision is binding for the supplier
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy
- Links to the Citizens Advice consumer service and Ombudsman Services: Energy website and email

## **Overall scores for websites**

Suppliers were scored on each of the criteria above. As with the scoring system for all the documentation, scores ranged from 10 for key criteria (such as mentioning the Citizens Advice consumer service or Ombudsman Services: Energy on the website, or giving full contact details of each organisation) to a score of 2 for criteria considered to be less important. If a supplier's website had a criterion that was only partially correct, the supplier was given a partial score – for example, 5 rather than 10 for having an out-of-date web link for the Citizens Advice consumer service, provided the link did actually work, or 2 out of 5 for having a link to the outdated version of the 'Know Your Rights' document.

A total of 131 points were available for websites, and the scoring process was consistent across both audits.

In the 2013 audit, overall scores for websites ranged from 110 to 0. The range of scores had shown improvement by 2014 – the highest score was 124 and the lowest was 54. The average score was 75 in 2013 and 90 in 2014. The median score was 80 in 2013 and 88 in 2014.

Overall scores achieved for websites are shown for each supplier below, together with the ranking of each supplier out of the 20 suppliers audited, an indication of whether their scores had increased or decreased since the 2013 audit, and the supplier's ranking in 2013.

**Table 5: Ranking of suppliers (websites)**

	Score 2014 (out of 131)	Position 2014	Increase/ decrease in score since 2013	Position 2013
SSE	124	1	+	3
EDF Energy	121	2	+	8
Scottish Power	116	3	+	1
First Utility	109	4	-	1
British Gas	108	5	+	7
iSupplyEnergy	103	6	-	3
e.on	99	7	+	13
Green Star	96	8	-	3
Ecotricity	91	9	+	16
Spark Energy	89	10	+	17
Utility Warehouse	87	11	+	16
Economy Energy	84	12	+	20
Good Energy	84	12	+	10
Green Energy	84	12	+	18
Flow Energy	82	15	-	6
npower	76	16	-	11
Utilita	74	17	-	9
Ovo	64	18	-	12
LoCO2	59	20	-	13
Co-operative Energy	54	20	-	15

It was disappointing to see that only 11 out of the 20 suppliers had actually increased their scores since the initial audit, given that they were provided with detailed information on how their scores could be improved. It was also disappointing to see that only 6 suppliers had achieved scores of more than 100 out of 131, which was a decrease from 2013, when 8 suppliers scored 100 or more points.

All of those showing a decrease in scores lost points primarily because they had not updated details for the Citizens Advice consumer service or Ombudsman Services: Energy, or because they had a link to the outdated 'Know Your Rights' document on their website.

The suppliers whose scores had decreased had made few, if any, of the recommended changes after the last audit. Given the ease with which it is possible to change websites, it is particularly disappointing that some suppliers had made so little effort to implement the recommended changes.

Economy Energy had made the biggest gain, having started from bottom position at the end of the last audit.

### **Key aspects of websites**

At the start of the 2013 audit, the most important criteria for websites, other than those required for compliance with Ofgem regulations, were agreed by the working party to be as follows:

- Number of clicks from the home page to the Citizens Advice consumer service and Ombudsman Services: Energy (two or fewer was deemed acceptable)
- Whether the word 'complaint/s' appears on the home page without moving the cursor
- Details of the Citizens Advice consumer service located in the complaints section
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy

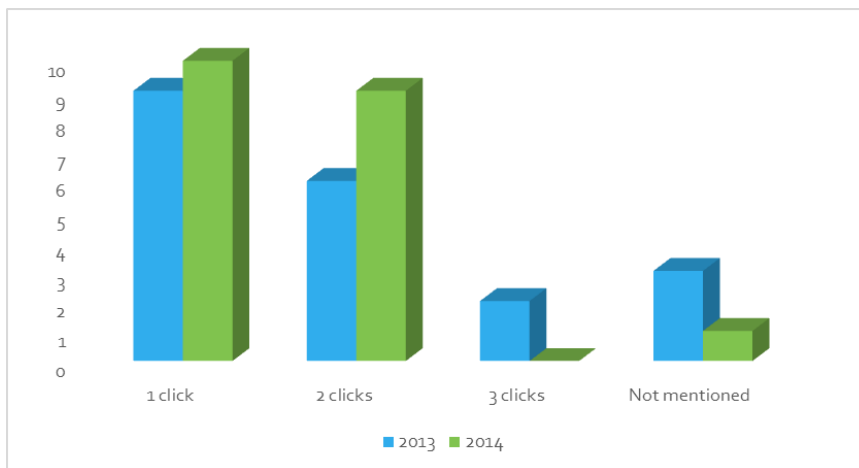
In the October 2013 audit, it was somewhat concerning that two suppliers failed to mention either the Citizens Advice consumer service or Ombudsman Services: Energy anywhere on their websites. A third supplier mentioned the Citizens Advice consumer service but not Ombudsman Services: Energy. A fourth supplier mentioned Consumer Focus, and a fifth supplier mentioned Consumer Direct, rather than referring to the Citizens Advice consumer service.

The September 2014 audit showed a marked improvement, with only Co-operative Energy still not mentioning the Citizens Advice consumer service – instead referring to the organisation as 'Consumer Futures'. All suppliers mentioned Ombudsman Services: Energy on their websites.

### **Number of clicks from the home page to the Citizens Advice consumer service and Ombudsman Services: Energy**

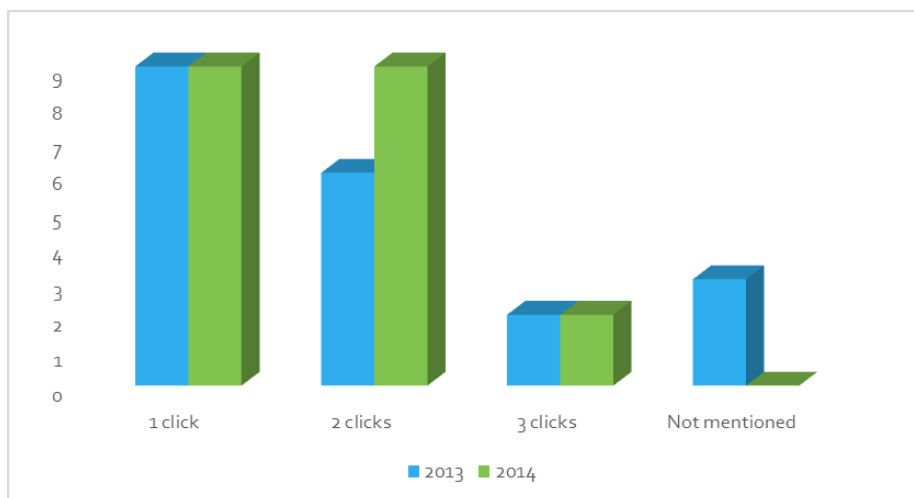
The working party agreed that, ideally, both organisations should be found just a single click away from a supplier's home page. Details of the Citizens Advice consumer service were a click away from the home pages of 9 suppliers in 2013, and 10 in 2014. No supplier in 2014 was more than 2 clicks away from the Citizens Advice consumer service (though of course Co-operative Energy did not mention the Citizens Advice consumer service and therefore appears in the 'not mentioned' column).

**Chart 4: Number of clicks from the home page to reach the Citizens Advice consumer service**



In September 2014, the websites of nine suppliers had details of Ombudsman Services: Energy within one click of their home page (the same number as in 2013), and nine suppliers had details two clicks away. Npower and e.on’s websites involved three clicks for customers seeking information about Ombudsman Services: Energy.

**Chart 5: Number of clicks from the home page to reach Ombudsman Services: Energy**



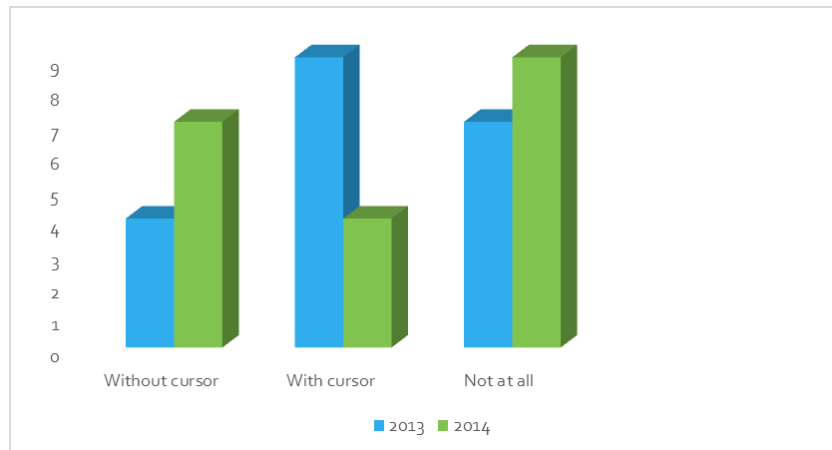
**Whether the word ‘complaint/s’ appears on the home page without moving the cursor**

The working party also agreed that the word ‘complaint/s’ should appear on suppliers’ home pages to enable customers to see immediately how they could find out about making a complaint. In 2013, only four suppliers had the word ‘complaint’ on the home page of their website and immediately visible. A further nine suppliers had included the word ‘complaint’ on their websites, but customers had to move the cursor to bring up the word. Seven suppliers did not have the word ‘complaint’ on their home page at all. This was identified as an area in which improvements could be made by improving the quality of signposting when a customer looks at a supplier’s website.



Disappointingly, the 2014 audit revealed that the number of suppliers displaying the word ‘complaint/s’ on their home page was still at a low level. Although the number of home pages with the word ‘complaint/s’ displayed without the customer having to move the cursor had increased from four to seven, the number not displaying the word at all had increased from seven to nine.

**Chart 6: Whether the word ‘complaint/s’ appears on the home page**



#### **Details of the Citizens Advice consumer service located in the complaints section**

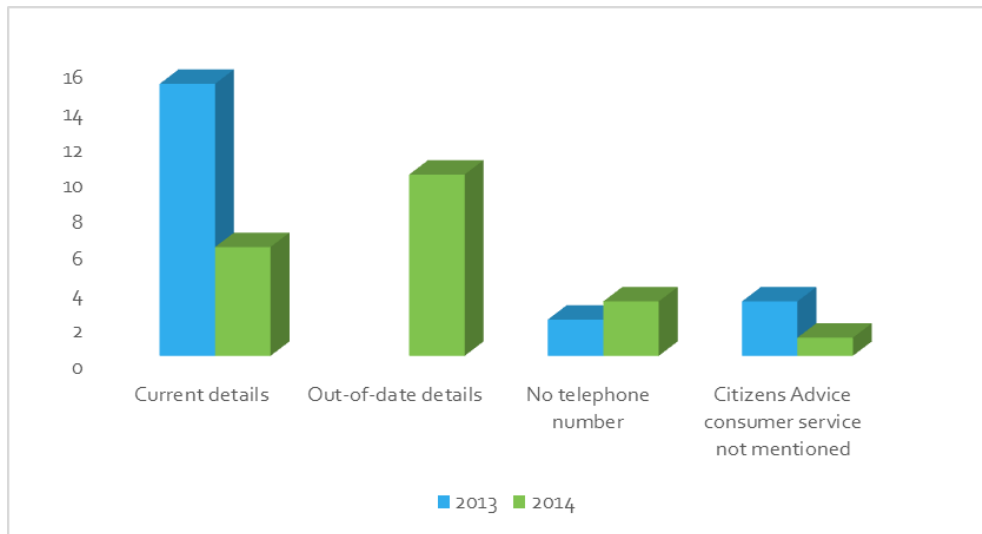
Another recommendation for good practice agreed by the working party was that details of the Citizens Advice consumer service should be located with a dedicated complaints section. In 2013, three suppliers did not have a dedicated complaints page or section on their websites. Of the 17 remaining suppliers, 15 included details of the Citizens Advice consumer service in their complaints sections.

By September 2014, all suppliers had a dedicated complaints section on their website, and all but Co-operative Energy mentioned the Citizens Advice consumer service within the section.

#### **Website details and telephone number given for the Citizens Advice consumer service and Ombudsman Services: Energy**

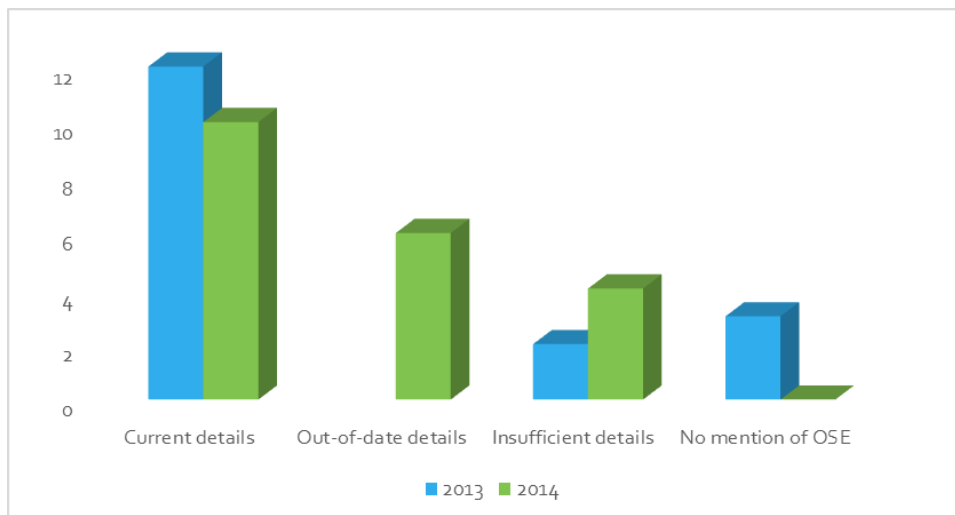
The audit looked at whether suppliers had given full contact details (both website and telephone number) for both organisations on their websites. In 2013, only three-quarters (15 suppliers) had full contact details for the Citizens Advice consumer service on their websites. By September 2014, only Co-operative Energy did not give contact details for the Citizens Advice consumer service at all on their website. However, although there was an improvement in the number of suppliers giving contact details in 2014, many contact details were insufficient or out of date. Only six suppliers provided both the correct website address and telephone number, 11 suppliers provided the old Citizens Advice consumer service website address ([adviceguide.org.uk](http://adviceguide.org.uk)) and eight suppliers provided the old 0845 telephone number, while 3 suppliers provided no telephone number at all.

**Chart 7: Current Citizens Advice consumer service details given on the website**



In 2013, 12 suppliers had full contact details for Ombudsman Services: Energy on their websites. By 2014, 16 suppliers gave both the website details and telephone number for Ombudsman Services: Energy. However, only 10 of these provided the current website address – 6 suppliers provided an out-of-date version. For the second year running, Green Energy used the wrong website address for Ombudsman Services: Energy, which takes the customer to a completely irrelevant website. All but one supplier provided the current telephone number for Ombudsman Services: Energy.

**Chart 8: Current Ombudsman Services: Energy details given on the website**



Suppliers should be encouraged to change out-of-date contact details as quickly as possible, and have been instructed to do so in their individual audit reports. It is important that the industry ensures that all contact details given on websites and all other documentation are both consistent and correct.

The table below shows how many suppliers out of the 20 audited met the other website audit criteria agreed by the working party both in 2013 and 2014.

**Table 6: Other audit criteria met**

	<b>2014: Number out of 20</b>	<b>2013: Number out of 20</b>
<b>Customer taken immediately onto complaints page when entering the word 'complaint' into the search facility</b>	8	7
<b>Complaints procedure is described on the website itself rather than on a PDF document</b>	17	16
<b>Existence of a dedicated complaints page</b>	20	17
<b>2 or fewer 'page downs' necessary to see details of the Citizens Advice consumer service</b>	16	12
<b>2 or fewer 'page downs' necessary to see details of Ombudsman Services: Energy</b>	17	10
<b>Ombudsman Services: Energy mentioned in complaints section</b>	19	14
<b>Complaints procedure steps outlined and include Ombudsman Services: Energy</b>	20	11
<b>Citizens Advice consumer service mentioned before Ombudsman Services: Energy</b>	10	7
<b>Link to current version of 'Know Your Rights' document</b>	6	11
<b>Link to old version of 'Know Your Rights' document</b>	8	
<b>Citizens Advice consumer service described as free and independent/impartial</b>	16	10
<b>Customers told that they can consult the Citizens Advice consumer service at any stage</b>	11	3
<b>Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after 8 weeks and the decision is binding for the supplier</b>	14	10
<b>Link to Citizens Advice consumer service website – current</b>	6	13
<b>Link to Citizens Advice consumer service website – old</b>	10	
<b>Link to Citizens Advice consumer service email</b>	6	0
<b>Link to Ombudsman Services: Energy website</b>	15	13
<b>Link to Ombudsman Services: Energy email</b>	11	5

After the 2013 audit, several key areas were identified in which scores could be improved upon. A number of these key areas have shown improvement. However, there remain some areas in which there is still a lot of scope for some suppliers to improve on their scores, most notably the following:

- Customers being taken immediately onto the complaints page if they enter the word 'complaint/s' into the search facility
- A link to the current version of the 'Know Your Rights' document

- The Citizens Advice consumer service can be consulted at any stage in the complaints process
- Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after eight weeks and the decision is binding on the supplier
- Reference and link to the current Citizens Advice consumer service website
- Link to the Citizens Advice consumer service email
- Link to the Ombudsman Services: Energy email

In 2013, seven suppliers had no search facility on their websites. All of these suppliers were asked to create a search facility after the audit. In 2014, six of the seven original suppliers had still not created a search facility, and one supplier who had had a search facility in 2013 had subsequently removed it.

Of those companies with search facilities in 2014, only seven suppliers take a customer straight to the complaints webpage if the word 'complaint/s' is entered into the search facility. This was exactly the same finding as in the 2013 audit. On several websites customers are taken to the complaints report rather than the page on how to make a complaint.

In 2013, a recurrent theme of the research was the confusion displayed by a minority of suppliers about the Citizens Advice consumer service. This was confused with Consumer Direct, Consumer Focus and Consumer Futures,<sup>12</sup> with customers being directed to the websites and telephone numbers of these organisations rather than that of the Citizens Advice consumer service.

By 2014, there was still some evidence of suppliers not understanding that Consumer Focus and Consumer Futures no longer exist. All suppliers have now been asked to remove all references to both organisations on their websites and documentation.

In 2013, there was yet more confusion over the 'Know Your Rights' document, with several suppliers referring to the document as 'Staying Connected'. This was despite the fact that 'Staying Connected' had been withdrawn in March 2013, to be replaced with the 'Know Your Rights' document. Although the reference to the link was wrong, generally the link was actually to the 'Know Your Rights' document. In 2014, two suppliers still referred to the document as 'Staying Connected'.

All suppliers had been sent an updated version of the 'Know Your Rights' document, which included the new contact details for the Citizens Advice consumer service, prior to the 2014 audit. However, the old version still appeared on eight suppliers' websites.

As will be seen in the remaining sections of this report, it is little surprise that so many consumers go straight to Ombudsman Services: Energy rather than consulting the Citizens Advice consumer service first. An inadequate number of suppliers make it clear that the Citizens Advice consumer service is there to help and advise at any stage of a customer's complaint and, depending on where they are in the complaints process, in many cases customers should contact the organisation before going to Ombudsman Services: Energy.

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<sup>12</sup> It has never been a requirement for suppliers to display contact details for either Consumer Futures or Consumer Focus on websites or on any documentation.

### 3.2 Bills and statements

Suppliers were asked to send examples of bills for quarterly cash/cheque (QCC) customers, direct debit (DD) customers and pre-payment meter (PPM) customers. The following numbers of documents were received for audit:

QCC bills	2013: 16	2014: 16
DD statements	2013: 16	2014: 18
PPM statements	2013: 12	2014: 14

Those companies that did not provide bills or statements for the audit were generally unable to do so either because they did not have any of that particular type of customer, or because they had not yet created the document or were in the process of changing it. These companies were not penalised for their lack of documentation in either audit.

For suppliers to be compliant with Ofgem regulations, they must inform customers that the Citizens Advice consumer service can help in providing information and advice to customers.

In 2013, all but two suppliers were compliant for QCC bills, all were compliant for DD statements and all but one supplier was compliant for PPM statements. By 2014, all suppliers were compliant for all types of bill and statement.

The criteria agreed by the working party against which all three types of bill were audited were as follows:

- Mention of Citizens Advice consumer service and Ombudsman Services: Energy
- The existence of a dedicated complaints section on the bill/statement
- The steps involved in the complaints procedure were outlined, and included Ombudsman Services: Energy
- Details of the Citizens Advice consumer service and Ombudsman Services: Energy located in the complaints section
- The Citizens Advice consumer service mentioned before Ombudsman Services: Energy
- The Citizens Advice consumer service being given greater or at least equal prominence to Ombudsman Services: Energy
- Reference made to the 'Know Your Rights' publication
- The Citizens Advice consumer service described as free and independent/impartial
- Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after eight weeks and the decision is binding for the supplier
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy

#### Overall scores for bills and statements

In 2013, the range of scores was 63 to 0 out of a possible score of 70 for all three types of bill and statement. In 2014, two suppliers achieved the top score of 70 for each type of bill and statement. The lowest scores for QCC bills, DD statements and PPM statements were 17, 15 and 5, respectively.

All average scores for bills and statements had increased in the 2014 audit. The average scores for QCC bills had risen from 41 to 53, the average for DD statements had risen from 45 to 51, and the average for PPM statements had risen from 42 to 44. Median scores were 50, 50 and 43 for QCC bills, DD statements and PPM bills in 2013. Median scores had risen to 58, 55 and 51 in 2014.

**Table 7: Overall scores for bills and statements (2014)**

<b>QCC bill 2014</b>	<b>Score out of 70</b>	<b>DD statement 2014</b>	<b>Score out of 70</b>	<b>PPM statement 2014</b>	<b>Score out of 70</b>
<b>1</b> British Gas	70	<b>1</b> British Gas	70	<b>1</b> British Gas	70
<b>1</b> EDF Energy	70	<b>1</b> EDF Energy	70	<b>1</b> EDF Energy	70
<b>3</b> Ecotricity	65	<b>3</b> Ecotricity	65	<b>3</b> Ecotricity	65
<b>3</b> LoCO2	65	<b>3</b> LoCO2	65	<b>4</b> e.on	58
<b>3</b> SSE	65	<b>3</b> SSE	65	<b>4</b> Scottish Power	58
<b>3</b> Utility Warehouse	65	<b>6</b> iSupplyEnergy	63	<b>6</b> Green Energy	53
<b>7</b> Green Star	60	<b>7</b> Green Star	60	<b>6</b> npower	53
<b>8</b> e.on	58	<b>8</b> e.on	58	<b>8</b> SSE	50
<b>8</b> Scottish Power	58	<b>8</b> Scottish Power	58	<b>9</b> Utilita	41
<b>10</b> Green Energy	53	<b>10</b> Green Energy	53	<b>10</b> First Utility	37
<b>10</b> npower	53	<b>10</b> npower	53	<b>11</b> Spark	25
<b>12</b> Co-operative Energy	51	<b>12</b> Co-operative Energy	51	<b>12</b> Good Energy	17
<b>13</b> Utilita	41	<b>13</b> Flow Energy	50	<b>13</b> Co-operative Energy	15
<b>14</b> First Utility	37	<b>14</b> Utilita	41	<b>14</b> Economy Energy	5
<b>15</b> Spark	25	<b>15</b> First Utility	37		
<b>16</b> Good Energy	17	<b>16</b> Spark	25		
		<b>17</b> Good Energy	17		
		<b>18</b> Ovo	15		

It was good to see both British Gas and EDF Energy having improved on already-good bills and statements to achieve maximum scores.

Again, since all suppliers had been told exactly what they needed to do to raise their scores, it was disappointing to see some low scores and the scores of some suppliers actually declining rather than improving.

The following table shows which suppliers had improved their scores and which had lower scores than in the first audit. The abbreviation 'ns '13' indicates that the supplier did not submit a document for the 2013 audit. The figure before the supplier name indicates their position in the rankings. If the supplier scored the same in both audits, the box contains the word 'same'.

**Table 8: Improvement in scores for bills and statements (2014)**

QCC bill 2014		DD statement 2014		PPM statement 2014	
1 British Gas	+	1 British Gas	+	1 British Gas	+
1 EDF Energy	+	1 EDF Energy	+	1 EDF Energy	+
3 Ecotricity	+	3 Ecotricity	+	3 Ecotricity	+
3 LoCO2	+	3 LoCO2	+	4 e.on	+
3 SSE	+	3 SSE	+	4 Scottish Power	+
3 Utility Warehouse	+	6 iSupplyEnergy	+	6 Green Energy	-
7 Green Star	ns '13	7 Green Star	ns '13	6 npower	+
8 e.on	+	8 e.on	+	8 SSE	-
8 Scottish Power	+	8 Scottish Power	+	9 Utilita	-
10 Green Energy	-	10 Green Energy	-	10 First Utility	ns '13
10 npower	+	10 npower	+	11 Spark	+
12 Co-operative Energy	-	12 Co-operative Energy	-	12 Good Energy	ns '13
13 Utilita	-	13 Flow Energy	-	13 Co-operative Energy	ns '13
14 First Utility	ns '13	14 Utilita	-	14 Economy Energy	+
15 Spark	+	15 First Utility	+		
16 Good Energy	+	16 Spark	+		
		17 Good Energy	ns '13		
		18 Ovo	Same		

### Key aspects of bills and statements

Before the 2013 audit, the most important criteria for bills and statements, in addition to the criteria required by Ofgem, were agreed by the working party to be:

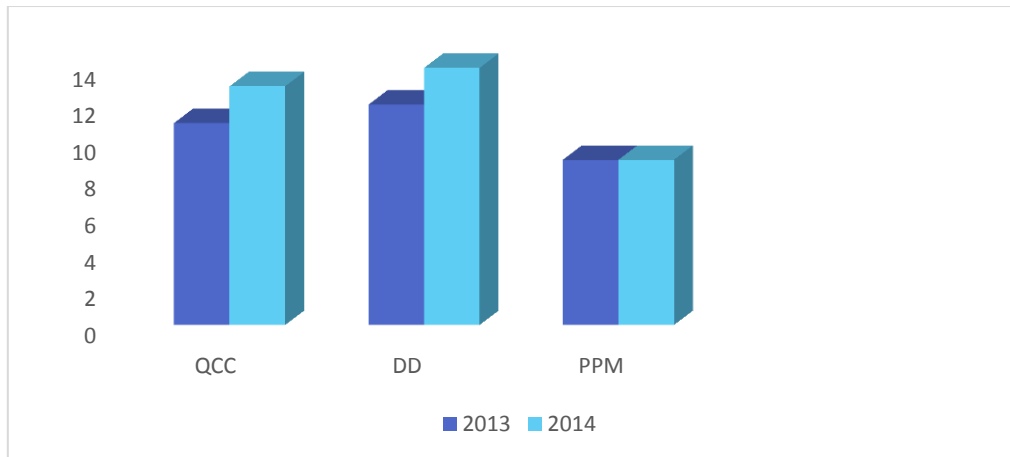
- whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned on bills and statements
- whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given.

### Whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned on bills and statements

As already mentioned, the Citizens Advice consumer service was mentioned in 2013 by all but two suppliers for QCC bills, and all but one supplier for PPM statements. In 2014, the Citizens Advice consumer service was mentioned by all but one supplier in all three documents.

In 2013, suppliers were less likely to refer to Ombudsman Services: Energy – roughly two-thirds of suppliers submitting documents mentioned it on each type of bill. In 2014, there had been little improvement. Just 13 of the 16 suppliers submitting QCC bills mentioned the organisation, 14 of the 18 suppliers submitting DD statements, and nine of the 14 suppliers submitting PPM statements.

**Chart 9: Ombudsman Services: Energy mentioned on bills and statements**



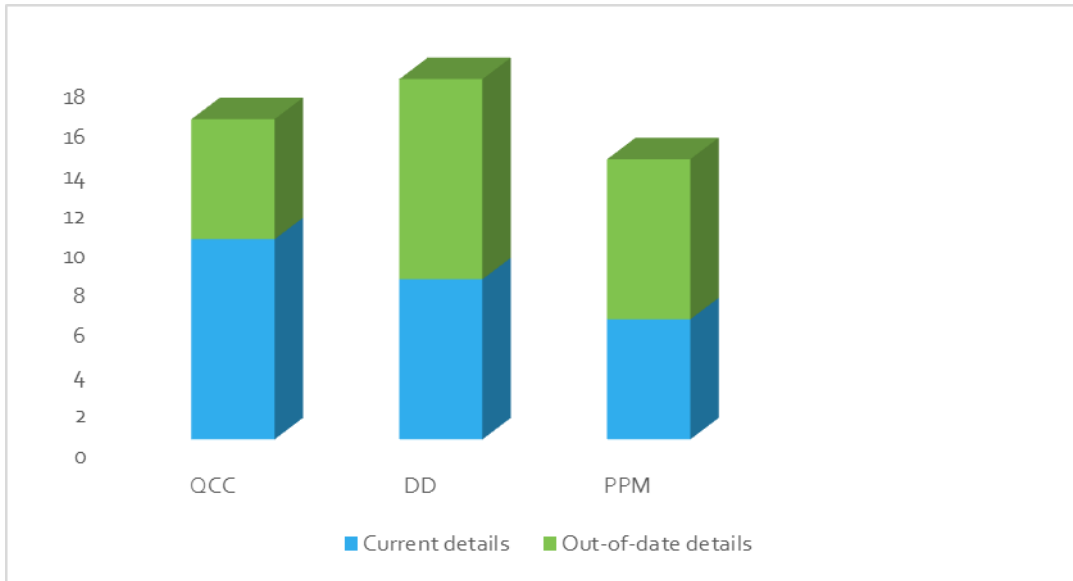
**Whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given**

Full contact details for the Citizens Advice consumer service, including website and telephone number, were given by most suppliers in 2013 and by all suppliers in 2014, on all three types of bill and statement. In 2013, two suppliers did not include these contact details on QCC bills and one supplier omitted the details from their PPM statement.

However, it should be said that the contact details given for the Citizens Advice consumer service on bills and statements audited in 2014 were as likely to be out of date as they were to be current. This was disappointing, given that suppliers had been issued with the new details before the 2014 audit.

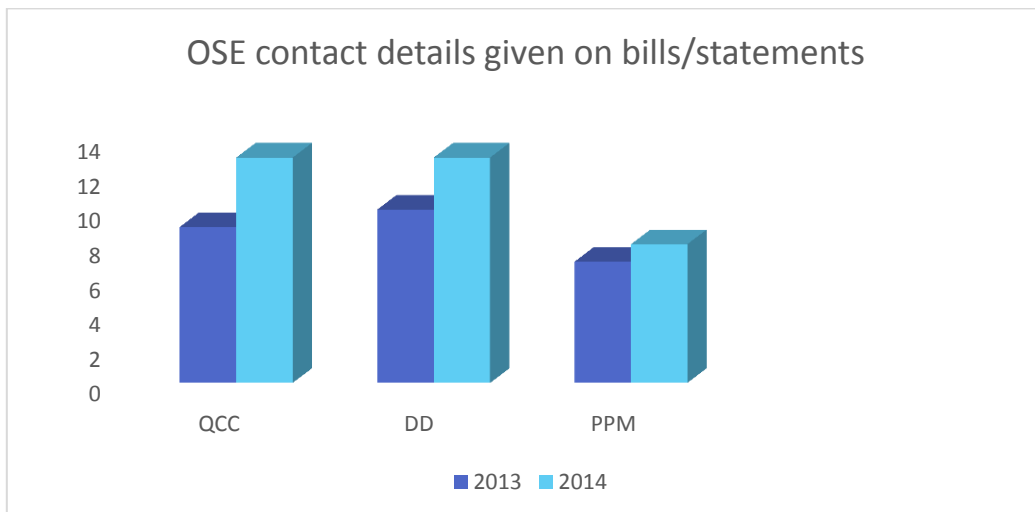


**Chart 10: Current Citizens Advice consumer service contact details mentioned on bills and statements**



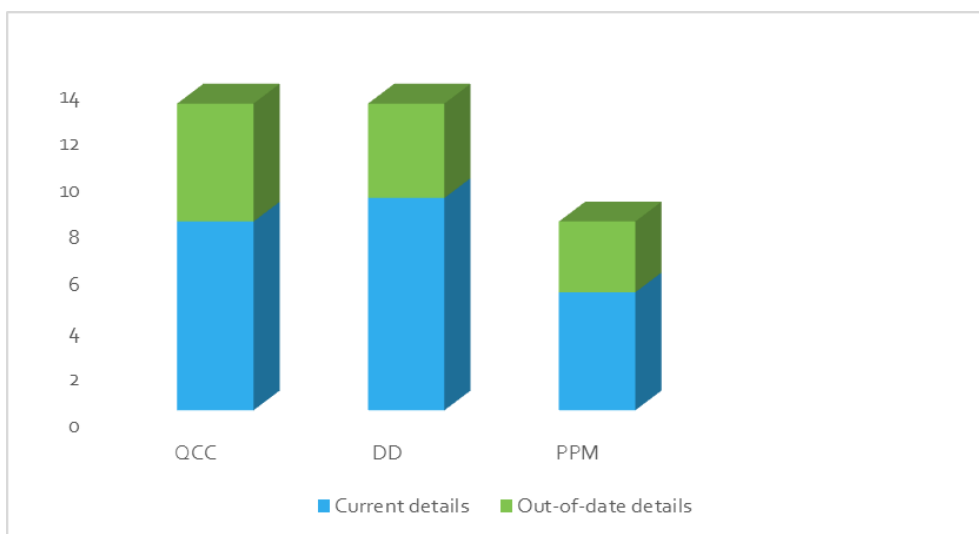
As in 2013, the number of suppliers giving contact details for Ombudsman Services: Energy was lower than the number giving contact details for the Citizens Advice consumer service. There had been some improvement over the year for QCC bills (13 suppliers had given contact details in 2014 compared with nine suppliers in 2013), and for DD statements (13 suppliers had given contact details in 2014 compared with 10 suppliers in 2013). Contact details contained within PPM statements showed little improvement.

**Chart 11: Ombudsman Services: Energy contact details given on bills and statements**



As with the Citizens Advice consumer service, several suppliers had out-of-date details for Ombudsman Services: Energy on their bills and statements.

**Chart 12: Current Ombudsman Services: Energy contact details mentioned on bills and statements**



The table below shows how many suppliers met the other audit criteria for bills and statements in 2014.

**Table 9: Other audit criteria met**

	<b>QCC: Number out of 16</b>	<b>DD: Number out of 18</b>	<b>PPM: Number out of 14</b>
<b>Dedicated complaints section</b>	14	15	10
<b>Complaints procedure steps outlined and include Ombudsman Services: Energy</b>	11	11	7
<b>Citizens Advice consumer service mentioned in complaints section</b>	10	11	8
<b>Ombudsman Services: Energy mentioned in complaints section</b>	12	13	8
<b>Citizens Advice consumer service mentioned before Ombudsman Services: Energy</b>	9	10	6
<b>Citizens Advice consumer service given greater or equal prominence</b>	13	14	9
<b>Reference to 'Know Your Rights' document</b>	13	15	1
<b>Citizens Advice consumer service described as free and independent/impartial</b>	12	14	8
<b>Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after eight weeks and the decision is binding for the supplier</b>	5	7	4

Table 10 shows the differences in the number of suppliers including each criteria between 2013 and 2014, for QCC bills. The findings were similar for QCC and PPM statements. There were some dramatic improvements in the levels of inclusion of criteria, and in particular with the addition of reference to the 'Know Your Rights' document and the fact that the Citizens Advice consumer service is free and independent/impartial.

**Table 10: Other audit criteria met**

	<b>2014 (QCC): Number out of 16</b>	<b>2013 (QCC): Number out of 16</b>
<b>Dedicated complaints section</b>	14	10
<b>Complaints procedure steps outlined and include Ombudsman Services: Energy</b>	11	9
<b>Citizens Advice consumer service mentioned in complaints section</b>	10	6
<b>Ombudsman Services: Energy mentioned in complaints section</b>	12	9
<b>Citizens Advice consumer service mentioned before Ombudsman Services: Energy</b>	9	5
<b>Citizens Advice consumer service given greater or equal prominence</b>	13	11
<b>Reference to 'Know Your Rights' document</b>	13	3
<b>Citizens Advice consumer service described as free and independent/impartial</b>	12	4
<b>Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after 8 weeks and the decision is binding for the supplier</b>	5	2

However, there is still a lot of scope for improvement amongst some suppliers. Key areas in which suppliers can improve are:

- mentioning the Citizens Advice consumer service in a dedicated complaints section
- mentioning the Citizens Advice consumer service before Ombudsman Services: Energy
- giving a full description of Ombudsman Services: Energy.

Given that bills and statements are a key vehicle for consumers finding out how they can contact the Citizens Advice consumer service and Ombudsman Services: Energy, with 19 per cent of those contacting the Citizens Advice consumer service having found the details on their bill, it is obviously vital that all suppliers make the required information readily available on all their bills and statements. It is also important for all suppliers to check that they are including the correct information.

### **3.3 Annual statements**

The number of documents submitted for audit was 16 in 2013, and 17 in 2014.

For suppliers to be compliant with Ofgem regulations, they must provide customers with information about where they can obtain impartial advice and information about changing supplier.

All suppliers mentioned the Citizens Advice consumer service on their annual statements. This was an improvement on the 2013 audit, when two suppliers failed to mention the organisation on the document.

The working party originally agreed a list of criteria on which annual statements should be audited, which was as follows:

- Mention of the Citizens Advice consumer service
- Reference made to the 'Know Your Rights' publication and Ofgem confidence code
- The Citizens Advice consumer service should be described as impartial
- Website details and telephone number for the Citizens Advice consumer service should be provided

#### **Overall scores for annual statements**

Scores for the 2014 audit ranged from 26 to 14 out of 26. It was gratifying to see 6 suppliers scoring full marks for their annual statements. In 2013, no supplier had scored full marks; the highest score being 24 and the lowest being 2.

The average score for annual statements had risen slightly from 18 to 21 in 2014, but the median score had actually fallen from 22 to 21.

The following table shows scores for annual statements.

**Table 11: Ranking of suppliers (annual statements)**

	Score 2014 (out of 26)	Position 2014	Increase/decrease in score since 2013	Position 2013
Ecotricity	26	1	ns '13	
EDF Energy	26	1	+	16
First Utility	26	1	+	12
Green Energy	26	1	+	3
iSupplyEnergy	26	1	+	10
LoCO2	26	1	+	10
British Gas	21	7	-	3
e.on	21	7	-	3
npower	21	7	+	15
SSE	21	7	-	7
Economy Energy	19	11	+	14
Flow Energy	19	11	ns '13	
Spark Energy	19	11	-	3
Utilita	19	11	-	11
Co-operative Energy	17	15	-	3
Good Energy	17	15	ns '13	
Scottish Power	14	17	-	3

### Key aspects of annual statements

The most important criteria were agreed by the working party to be:

- whether the Citizens Advice consumer service was mentioned
- whether the website address and telephone number for the Citizens Advice consumer service were given.

### Whether the Citizens Advice consumer service was mentioned

As has already been mentioned, in 2013, 14 out of 16 suppliers mentioned the Citizens Advice consumer service. In 2014, all suppliers submitting annual statements for audit mentioned the service.

### Whether the website address and telephone number for the Citizens Advice consumer service was given

Once again, suppliers did not always give the current contact details for the Citizens Advice consumer service – only 6 suppliers gave the correct telephone number and website. Out-of-date contact details were given by 11 suppliers for either the website, telephone number or both.

In 2013, although most suppliers had included a reference to the Citizens Advice consumer service and contact details on their annual statements, few had included any reference to ‘Know Your Rights’ or the Ofgem Confidence Code. The 2014 audit showed a much greater awareness of the need to include these references on their annual statements.

**Table 12: Other audit criteria met**

	<b>2014: Number out of 17</b>	<b>2013: Number out of 16</b>
<b>Reference to ‘Know Your Rights’</b>	11	2
<b>Reference to Ofgem Confidence Code</b>	14	4
<b>Citizens Advice consumer service described as impartial</b>	17	8

In the 2013 audit, there was some confusion surrounding the Ofgem Confidence Code. Of the four suppliers mentioning the code on their annual statement, only one supplier actually attributed it to Ofgem. Two suppliers labelled it as the ‘Consumer Focus Confidence Code’ and the other supplier referred to it as the ‘Citizens Advice Consumer Code’.

This confusion had been largely eradicated by the 2014 audit, with only one supplier calling the code anything other than the ‘Ofgem Confidence Code’ (referring to the publication as ‘Staying Connected’).

### 3.4 Notification of unilateral contract variation

The number of documents submitted for audit was 16 in 2013 and 17 in 2014.

For suppliers to be compliant with Ofgem regulations, they must provide customers with information about where they can obtain impartial advice and information about changing supplier.

14 of the 17 suppliers in the 2014 audit were compliant with Ofgem regulations, which was an improvement on the 9 suppliers who were compliant in the 2013 audit.

The criteria on which notifications of unilateral contract variation were audited were as follows:

- Mention of the Citizens Advice consumer service
- Reference made to the 'Know Your Rights' publication and Ofgem Confidence Code
- The Citizens Advice consumer service should be described as free and independent/impartial
- Website details and telephone number given for the Citizens Advice consumer service

#### **Overall scores for notification of unilateral contract variation**

Scores ranged from 29 (full marks) to 0. The average score had risen from 10 to 16, and the median score had risen from 0 to 17.

EDF Energy made an impressive effort to improve the company's notification of unilateral contract variation, moving from last position to first position in the ranking and scoring full marks. It was disappointing to see that both Green Energy and Utilita did nothing to improve their scores of 0 in the first round of auditing.

**Table 13: Ranking of suppliers (notification of unilateral contract variation)**

	Score 2014 (out of )	Position 2014	Increase/ decrease in score since 2013	Position 2013
EDF Energy	29	1	+	16
LoCO2	27	2	+	7
Utility Warehouse	27	2	+	3
Scottish Power	25	4	same	1
iSupplyEnergy	24	5	+	16
Flow Energy	20	6	ns '13	
npower	20	6	-	1
First Utility	17	8	+	16
Spark	17	8	+	16
SSE	17	8	-	3
Co-operative Energy	15	11	+	16
Ecotricity	15	11	-	3
Ovo	15	11	+	7
e.on	10	14	same	7
Green Energy	0	15	same	16
Green Star	0	15	ns '13	
Utilita	0	15	same	16

### Key aspects of notification of unilateral contract variation

The most important criteria were agreed by the working party to be:

- whether the Citizens Advice consumer service was mentioned
- whether the website address and telephone number for the Citizens Advice consumer service was given.

### Whether the Citizens Advice consumer service was mentioned

As has already been seen, 14 of the 17 suppliers submitting a document for audit in 2014 mentioned the Citizens Advice consumer service, compared with 9 suppliers in the previous audit.



### **Whether the website address and telephone number for the Citizens Advice consumer service was given**

In 2013, only 6 out of 16 suppliers provided both the Citizens Advice consumer service website and telephone contact details on their unilateral contract variation notification. In 2014, this figure had risen to 14 of the 17 suppliers. However, only 5 of those 14 suppliers gave the updated website and telephone number.

Numbers of suppliers including the other audit criteria within their annual statements were as follows:

**Table 14: Other audit criteria met**

	<b>2014: Number out of 17</b>	<b>2013: Number out of 16</b>
<b>Reference to ‘Know Your Rights’</b>	6	0
<b>Reference to Ofgem Confidence Code</b>	3	0
<b>Citizens Advice consumer service described as free and independent/impartial</b>	6	2

There were some improvements, but large numbers of suppliers still did not have the required references to ‘Know Your Rights’ and the Ofgem Confidence Code, as well as not including a full description of the Citizens Advice consumer service. These are criteria which can clearly be improved upon.

### **3.5 Energy supply contract**

The number of documents submitted for audit were 18 in 2013 and 19 in 2014.

In the 2013 round of auditing, some suppliers stated that they sent additional documentation to customers with their energy supply contracts. This additional documentation did not form part of the audit, and so many suppliers received low scores in 2013 for not mentioning the Citizens Advice consumer service on the actual contracts.

To be compliant with Ofgem regulations, the supplier must provide information about what a customer can do if they have any concerns, including details of how the Citizens Advice consumer service can be contacted. The Ofgem regulations state that it is acceptable to include this information on accompanying literature rather than on the contract itself. After the first audit, suppliers were told that it was the view of Citizens Advice (Consumer Futures at the time) that details of the Citizens Advice consumer service should be included within the contract itself, since customers are more likely to throw away or lose accompanying literature.

The criteria on which energy supply contracts were audited were as follows:

- Mention of the Citizens Advice consumer service and Ombudsman Services: Energy
- The existence of a dedicated complaints section
- The steps involved in the complaints procedure should be outlined, and include Ombudsman Services: Energy
- Details of the Citizens Advice consumer service and Ombudsman Services: Energy located in the complaints section
- The Citizens Advice consumer service mentioned before Ombudsman Services: Energy
- The Citizens Advice consumer service being given greater or at least equal prominence to Ombudsman Services: Energy
- Reference made to the 'Know Your Rights' publication
- The Citizens Advice consumer service should be described as free and independent/impartial and can be consulted at any stage in the complaints process
- Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after eight weeks and the decision is binding for the supplier
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy

### **Overall scores for supply contracts**

A maximum score of 70 was achieved by EDF Energy for its energy supply contract in 2014. The lowest score was 0. In 2013, the maximum score was 60, and again the lowest was 0. The average score had risen from 13 to 35 (still only half of the maximum score) and the median had risen from 0 to 29. These increases are a reflection of the low level of information contained within contracts in the 2013 audit, and the efforts of some suppliers to rectify this before the 2014 audit.

**Table 15: Ranking of suppliers (supply contracts)**

	Score 2014 (out of 75 )	Position 2014	Increase/ decrease in score since 2013	Position 2013
EDF Energy	75	1	+	5
iSupplyEnergy	70	2	+	18
npower	70	2	+	4
Green Star	65	4	ns '13	
Utility Warehouse	65	4	+	18
Scottish Power	60	6	+	6
Green Energy	43	7	+	18
e.on	41	8	-	3
LoCO2	37	9	+	18
Spark	29	10	+	18
British Gas	22	11	+	6
Utilita	20	12	+	18
First Utility	15	13	+	6
Ovo	15	13	+	18
SSE	15	13	-	1
Ecotricity	5	16	+	18
Flow	5	16	same	6
Good Energy	5	16	+	18
Co-operative Energy	0	19	-	2

EDF Energy, iSupplyEnergy, npower, Scottish Power and Utility Warehouse had all made major improvements to their supply contracts. Green Energy had also introduced major improvements, though still has some way to go until a maximum score is achieved. Both Co-operative Energy and SSE had scored well in the 2013 audit but appear to have changed their documents with detrimental effect – the latter is currently revising their supply contract.

## **Key aspects of supply contracts**

The most important criteria were agreed by the working party to be:

- whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned
- whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given.

### **Whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned**

In 2013, only five suppliers mentioned the Citizens Advice consumer service on their contracts, and only 3 mentioned Ombudsman Services: Energy. In 2014 there was a marked improvement, with 14 suppliers mentioning the Citizens Advice consumer service and nine mentioning Ombudsman Services: Energy on their energy supply contracts.

### **Whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given**

In 2013, only four suppliers gave the full contact details for the Citizens Advice consumer service on their supply contract. By 2014, this number had increased to 13, though it should be noted that only four of the 13 had included up-to-date contact details.

In 2013, only two suppliers gave the full contact details for Ombudsman Services: Energy. By 2014 this number had increased to seven, though again, two suppliers gave contact details that were out of date.

The number of suppliers passing the other audit criteria within their supply contract was as follows:

**Table 16: Other audit criteria met**

	<b>2014: Number out of 19</b>	<b>2013: Number out of 18</b>
<b>Dedicated complaints section</b>	13	7
<b>Complaints procedure steps outlined and include Ombudsman Services: Energy</b>	8	3
<b>Citizens Advice consumer service mentioned in complaints section</b>	9	2
<b>Ombudsman Services: Energy mentioned in complaints section</b>	9	3
<b>Citizens Advice consumer service mentioned before Ombudsman Services: Energy</b>	7	1
<b>Citizens Advice consumer service given greater or equal prominence</b>	8	3
<b>Reference to 'Know Your Rights'</b>	9	0
<b>Citizens Advice consumer service described as free and independent/impartial</b>	9	3
<b>Customers told that they can consult the Citizens Advice consumer service at any stage</b>	4	1
<b>Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after 8 weeks and the decision is binding for the supplier</b>	5	1

Although the number of suppliers having a dedicated complaints section had increased, along with the number of those now including each criteria within their supply contracts, there is still huge room for improvement. Fewer than half of all suppliers included nine of the 10 criteria agreed to be important by the working party within their supply contracts.

### **3.6 Complaints leaflets**

The number of documents submitted for audit was 14 in 2013 and 20 in 2014.

Ofgem regulations require suppliers to signpost to the Citizens Advice consumer service and Ombudsman Services: Energy with regards to their complaint handling procedures.

Suppliers were asked to send in any booklets or leaflets that are sent out to customers and contain information about making complaints.

The criteria on which the working party agreed that complaints leaflets should be audited were as follows:

- Mention of the Citizens Advice consumer service and Ombudsman Services: Energy
- The steps involved in the complaints procedure should be outlined, and include Ombudsman Services: Energy
- The Citizens Advice consumer service mentioned before Ombudsman Services: Energy

- Reference made to the 'Know Your Rights' publication
- The Citizens Advice consumer service should be described as free and independent/impartial and can be consulted at any stage in the complaints process
- Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after eight weeks and the decision is binding for the supplier
- Website details and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy

### **Overall scores for complaints leaflets**

In 2013, scores for complaints leaflets ranged from 54 out of a possible 61 points, to 0. In 2014, 3 suppliers scored maximum points and the lowest score was 17. Mean scores had increased from 39 in 2013 to 44 in 2014, but the median score had actually decreased from 49 to 42.

**Table 17: Ranking of suppliers (complaints leaflets)**

	Score 2014 (out of 61)	Position 2014	Increase/decrease in score since 2013	Position 2013
<b>British Gas</b>	61	1	+	1
<b>EDF Energy</b>	61	1	+	6
<b>Utility Warehouse</b>	61	1	+	7
<b>Scottish Power</b>	57	4	+	10
<b>LoCO2</b>	56	5	+	7
<b>SSE</b>	56	5	+	1
<b>iSupplyEnergy</b>	54	7	ns '13	
<b>Green Star</b>	47	8	ns '13	
<b>First Utility</b>	47	8	ns '13	
<b>Good Energy</b>	44	10	ns '13	
<b>Utilita</b>	44	10	-	7
<b>e.on</b>	42	12	-	4
<b>Npower</b>	42	12	-	4
<b>Flow Energy</b>	39	14	-	1
<b>Economy Energy</b>	37	15	+	12
<b>Spark Energy</b>	32	16	+	
<b>Green Energy</b>	29	17	+	
<b>Ecotricity</b>	27	18	+	
<b>Co-operative Energy</b>	22	19	ns '13	
<b>Ovo</b>	17	20	same	11

No supplier had made dramatic improvements to their complaints leaflets, though it was good to see British Gas, EDF Energy and Utility Warehouse making the required improvements to achieve maximum points.

## Key aspects of complaints leaflets

The most important criteria were agreed by the working party to be:

- whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned
- whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given.

### Whether the Citizens Advice consumer service and Ombudsman Services: Energy were mentioned

In 2013, 10 out of the 14 suppliers who submitted complaints leaflets for audit referred to the Citizens Advice consumer service and 13 referred to Ombudsman Services: Energy within their complaints leaflets.

In 2014, 18 of the 20 suppliers mentioned the Citizens Advice consumer service, and all 20 suppliers mentioned Ombudsman Services: Energy.

### Whether the website address and telephone number for the Citizens Advice consumer service and Ombudsman Services: Energy were given

In 2013, 10 suppliers gave contact details for the Citizens Advice consumer service and 11 gave details for Ombudsman Services: Energy. In 2014, more suppliers (15) gave contact details for the Citizens Advice consumer service, though 8 of these gave out-of-date details. 17 suppliers gave the contact details for Ombudsman Services: Energy; 10 of which were outdated.

The number of suppliers mentioning the other audit criteria within their complaints leaflets/brochures was as follows:

**Table 18: Other audit criteria met**

	<b>2014: Number out of 20</b>	<b>2013: Number out of 14</b>
<b>Complaints procedure steps outlined and include Ombudsman Services: Energy</b>	20	10
<b>Citizens Advice consumer service mentioned before Ombudsman Services: Energy</b>	9	6
<b>Reference to 'Know Your Rights'</b>	6	1
<b>Citizens Advice consumer service described as free and independent/impartial</b>	15	7
<b>Customers told that they can consult the Citizens Advice consumer service at any stage</b>	9	1
<b>Ombudsman Services: Energy described as free, independent, investigates complaints if no resolution after 8 weeks and the decision is binding for the supplier</b>	15	8



The major positive change in audit criteria being met was that all suppliers outlined the complaints procedure in their documentation, and included Ombudsman Services: Energy in it. All criteria had shown an increase in scores, though there is still much room for improvement from some suppliers.

### **3.7 Audits of the Citizens Advice consumer service, Ombudsman Services: Energy and Energy UK websites**

It was felt that the websites of the Citizens Advice consumer service, Ombudsman Services: Energy and Energy UK should be audited in 2014 to see whether the three organisations are currently providing a joined-up service.

The audit of the websites of these organisations found that this was not the case.

The Citizens Advice consumer service had many good features and it was very easy to get information about Ombudsman Services: Energy from the organisation's website.

However, the description of the Citizens Advice consumer service on the Citizens Advice complaints page was not the standard description provided to suppliers, on which they were audited. The Citizens Advice consumer service should be described as free as well as being independent/impartial, and customers should also be told that the Citizens Advice consumer service can be consulted at any stage in the complaints process. The description on the Citizens Advice consumer service website also contained the out-of-date telephone number for the service, which was something suppliers were also penalised for, but this was amended as soon as the error was realised.

Whilst the Ombudsman Services: Energy website had some good features, representation of the Citizens Advice consumer service on the website was very poor. No mention was made of the Citizens Advice consumer service itself. Citizens Advice merely appeared as one of many in a list of organisations that can be contacted for general advice, and not for energy specific advice. The link given was to the Citizens Advice general home page rather than the energy-specific home page.

Ombudsman Services: Energy has a webpage entitled 'Complaining to an Energy Company'. Ideally, the Citizens Advice consumer service should appear on this webpage.

Customers need to be directed to the Citizens Advice consumer service if they are experiencing problems with their energy supplier and require independent advice. They should also be advised that the service can be consulted at any stage in the complaints process. It would be helpful if the Ombudsman Services: Energy website had a link to the Citizens Advice consumer service web form.

There was no link to the current 'Know Your Rights' document on the Ombudsman Services: Energy website. Although there is no requirement to have this link, it is felt that this would be good practice.

Again, the Energy UK website had some good points, including the appearance of both the Citizens Advice consumer service and Ombudsman Services: Energy on a dedicated page devoted to making a complaint. The website also outlined the steps involved in making a complaint, and the role that the Citizens Advice consumer service and Ombudsman Services: Energy can play in the process.

However, there was an inadequate description of the Citizens Advice consumer service and no mention of the fact that the service is free and independent/impartial, or that the organisation can be consulted at any stage in the complaints process.

It would also have been good to see a link to the updated 'Know Your Rights' document contained within the Citizens Advice consumer service description.

The Energy UK website also failed to include adequate contact details for both organisations – there were no details of the address of the Citizens Advice consumer service home page and no telephone number. The link provided took customers to the Citizens Advice general home page rather than to the energy-specific home page, and there was no link to the Citizens Advice consumer service web form.

There was also an inadequate description of Ombudsman Services: Energy and no mention of the fact that the organisation is free, independent, investigates complaints if there is no resolution after eight weeks and that the decision is binding for the supplier.

Again, there were no details of or link to the Ombudsman Services: Energy home page, and no telephone number was given.

Given that these organisations should both be working and appear to be working in partnership to direct consumers to the most appropriate sources of advice, it is important that there is greater awareness of the need to provide adequate and consistent signposting amongst all three organisations.

## 4.0 Conclusions

The 2013 audit of energy suppliers revealed that there were inconsistencies across suppliers as to how well signposting to the Citizens Advice consumer service and Ombudsman Services: Energy appeared on websites and other forms of communication to customers. All energy suppliers were given detailed reports showing how they could improve their signposting.

Levels of improvement shown in the follow-up audit, which was conducted in 2014, were disappointing. Although average scores had improved for all documents, levels of improvement were not as great as might have been anticipated. Several suppliers scored particularly poorly with their supply contracts and unilateral contract variation notices, and scores were also poor for the PPM statements issued by some suppliers.

There was room for improvement amongst all suppliers when it came to websites, these being a particularly important source of information for customers seeking advice about contacting the right organisation for advice about making a complaint.

Some suppliers' scores dropped between the two audits, generally because contact details for Citizens Advice consumer service or the 'Know Your Rights' document had not been updated.

EDF Energy stands out as the supplier which had improved on its scores across the board to achieve maximum scores in all of the documents provided for audit, together with a very good score for the company's website.

The six larger energy suppliers, with the exception of npower, tended to feature towards the top of the tables when it came to scoring, but some of the smaller and newer entrants to the energy supply market achieved good scores in all of the areas audited, most notably iSupplyEnergy which appears in seventh place or above for every document submitted for audit.

Before the 2014 audit suppliers were sent updated contact details for Citizens Advice consumer service. A disappointingly low number of suppliers had actually changed the contact details. Some suppliers also included out of date contact details for Ombudsman Services: Energy. Suppliers need to make sure that all of the contact details provided for both Citizens Advice consumer service and Ombudsman Services: Energy are current.

Suppliers were also sent the up to date version of the 'Know Your Rights' document before the 2014 audit. Again, not all suppliers had swapped the old version for the new one on websites and electronic correspondence. Suppliers need to make sure that all documents issued by the Citizens Advice consumer service and Ombudsman Services: Energy are regularly updated.

In 2013, there was some confusion about the Citizens Advice consumer service. Some suppliers referred to the organisation as Consumer Focus or Consumer Direct. This confusion seems to have largely disappeared, though a small number of suppliers made references to both organisations on their websites and documents, and need to remove all references to both organisations.

Some suppliers, in some of their documents, only mentioned the Citizens Advice consumer service in terms of offering advice about switching. Suppliers need to inform consumers that the Citizens Advice consumer service is there to provide advice about making complaints as well as about switching.

The websites of the Citizens Advice consumer service, Ombudsman Services: Energy and Energy UK were also included in the audit to see whether the three organisations offer a joined-up approach to

customers seeking advice about energy issues. This was not found to be the case. The Ombudsman Services: Energy website in particular made little reference to the Citizens Advice consumer service, and the organisation needs to make it very much clearer that customers should use the Citizens Advice consumer service if they are experiencing problems with their energy supplier and require independent advice. They should also be advised that the service can be consulted at any stage in the complaints process.

## APPENDIX – SUPPLIER SCORING SYSTEM

### WEBSITES

	<b>SCORE</b>
1 click from home page to CS	10
2 clicks from home page to CS	5*
1 click from home page to OSE	10
2 clicks from home page to OSE	5*
The word 'complaints' appears on the home page without moving cursor	10
The word 'complaints' appears on the home page with moving cursor	5*
Taken immediately to the complaints page if the word 'complaint' is entered into the search facility	5
Complaints procedure is described on website as opposed to a PDF document	5
Dedicated complaints page on website	5
CS located on dedicated complaints page	10
OSE located on dedicated complaints page	5
2 or fewer 'page downs' hit to see CS details on complaints page	5
2 or fewer 'page downs' hit to see OSE details on complaints page	5
Steps involved in the complaints procedure outlined and includes OSE	5
CS mentioned before OSE	2
Link to 'Know Your Rights' document (updated version)	5
CS description – free and independent/impartial	5
CS description – can be consulted at any stage in the complaints process	5
New CS website details ( <a href="http://www.citizensadvice.org.uk/energy">www.citizensadvice.org.uk/energy</a> ) and the new 0345 phone number given on webpage	10
Link to CS website on webpage	5
Link to CS online web form on webpage <a href="https://forms.adviceguide.org.uk/complaint_energy.aspx">https://forms.adviceguide.org.uk/complaint_energy.aspx</a>	2
OSE description – free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier	5
OSE website details and 0330 phone number given on webpage	10
Link to OSE website on webpage	5
Link to OSE email on webpage	2
<b>TOTAL</b>	<b>131</b>

\* - not included in maximum score

**BILL FOR QCC CUSTOMERS, STATEMENT OF ACCOUNT FOR DD CUSTOMERS AND STATEMENT OF ACCOUNT FOR PPM CUSTOMERS**

	<b>SCORE</b>
CS mentioned	10
OSE mentioned	10
Dedicated complaints section	5
Steps involved in the complaints procedure outlined and includes OSE	2
CS located in dedicated complaints section	5
OSE located in dedicated complaints section	2
CS mentioned before OSE	2
Both organisations given the same prominence	2
Reference to 'Know Your Rights' publication within CS description	2
CS description – free and independent/impartial	5
New CS website details ( <a href="http://www.citizensadvice.org.uk/energy">www.citizensadvice.org.uk/energy</a> ) and the new 0345 phone number given	10
OSE description – free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier	5
OSE website details and 0330 phone number given	10
<b>TOTAL</b>	<b>70</b>

**ANNUAL STATEMENT**

	<b>SCORE</b>
CS mentioned	10
Reference to 'Know Your Rights' publication within CS description	2
Reference to Ofgem confidence code	2
CS description – impartial	2
New CS website details ( <a href="http://www.citizensadvice.org.uk/energy">www.citizensadvice.org.uk/energy</a> ) and new 0345 phone number given	10
<b>TOTAL</b>	<b>26</b>

**NOTIFICATION OF UNILATERAL CONTRACT VARIATION**

	<b>SCORE</b>
CS mentioned	10
Reference to 'Know Your Rights' publication within CS description	2
Reference to Ofgem confidence code	2
CS description – free and independent/impartial	5
New CS website details ( <a href="http://www.citizensadvice.org.uk/energy">www.citizensadvice.org.uk/energy</a> ) and new 0345 phone number given	10
<b>TOTAL</b>	<b>29</b>

## ENERGY SUPPLY CONTRACT

	SCORE
CS mentioned	10
OSE mentioned	10
Dedicated complaints section	5
Steps involved in the complaints procedure outlined and includes OSE	2
CS located in dedicated complaints section	5
OSE located in dedicated complaints section	2
CS mentioned before OSE	2
Both organisations given the same prominence	2
Reference to 'Know Your Rights' publication within CS description	2
CS description – free and independent/impartial	5
CS description – can be consulted at any stage in the complaints process	5
New CS website details ( <a href="http://www.citizensadvice.org.uk/energy">www.citizensadvice.org.uk/energy</a> ) and new 0345 phone number given	10
OSE description – free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier	5
OSE website details and 0330 phone number given	10
<b>TOTAL</b>	<b>75</b>

## COMPLAINT HANDLING LEAFLET/BOOKLET

	SCORE
CS mentioned	10
OSE mentioned	10
Steps involved in the complaints procedure outlined and includes OSE	2
CS mentioned before OSE	2
Reference to 'Know Your Rights' publication within CS description	2
CS description – free and independent/impartial	5
CS description – can be consulted at any stage in the complaints process	5
New CS website details ( <a href="http://www.citizensadvice.org.uk/energy">www.citizensadvice.org.uk/energy</a> ) and new 0345 phone number given	10
OSE description – free, independent, investigates complaints if no resolution after 8 weeks and decision is binding for supplier	5
OSE website details and 0330 phone number given	10
<b>TOTAL</b>	<b>61</b>

Please note that partial scores were given in some instances – for example, if a supplier had the old Citizens Advice consumer service details they were given 5 points instead 10 points.