

Company referral process: Energy and post v2.0

Citizens Advice consumer
service

July 2021



Document information

Procedural summary information
Company referral procedure - energy and post (all energy and post trained delivery centre staff)
Process includes the procedure and agreement for referring clients to energy and post companies. This includes the agreed work to be completed by Citizens Advice, contact centres and partners.
Procedural leads: <i>Jess Hawker-Meadley</i> <i>Citizens Advice Operations Manager</i> <i>Contact Centre Client Services Manager</i>
Change process:
Associated processes: <i>Ombudsman Services: Energy Process, Extra Help Unit: Process, Energy Case Data Collection and Coding, Post Case Data Collection and Coding</i>

Modifications

Version	Name	Page(s) modified	Type of modification	Date
1.0	Lydia Anderson		Baseline from transition version 0.7	30/03/2012
1.1	Tom Ballard		Updating all pages	20/06/2016
1.2	Tom Ballard		Updating all pages	18/08/2014
1.3	Tom Ballard		Feedback from Kate Hobson	11/09/2014
1.4	Tom Ballard			11/09/2014
1.5	Jess Hawker-Meadley		Business process review, all pages. Combination of previous business process for Company referral procedure and agreement	10/09/2015
1.6	JHM		Review and update to email referral	9/2/18

1.7	JHM		Updates following Data Protection legislation changes	18/5/18
1.8	JHM		Updates following DPIA review	3/12/19
1.9	JHM		Business Process Review	July 2020
2.0	JHM		Business process review	May 2021

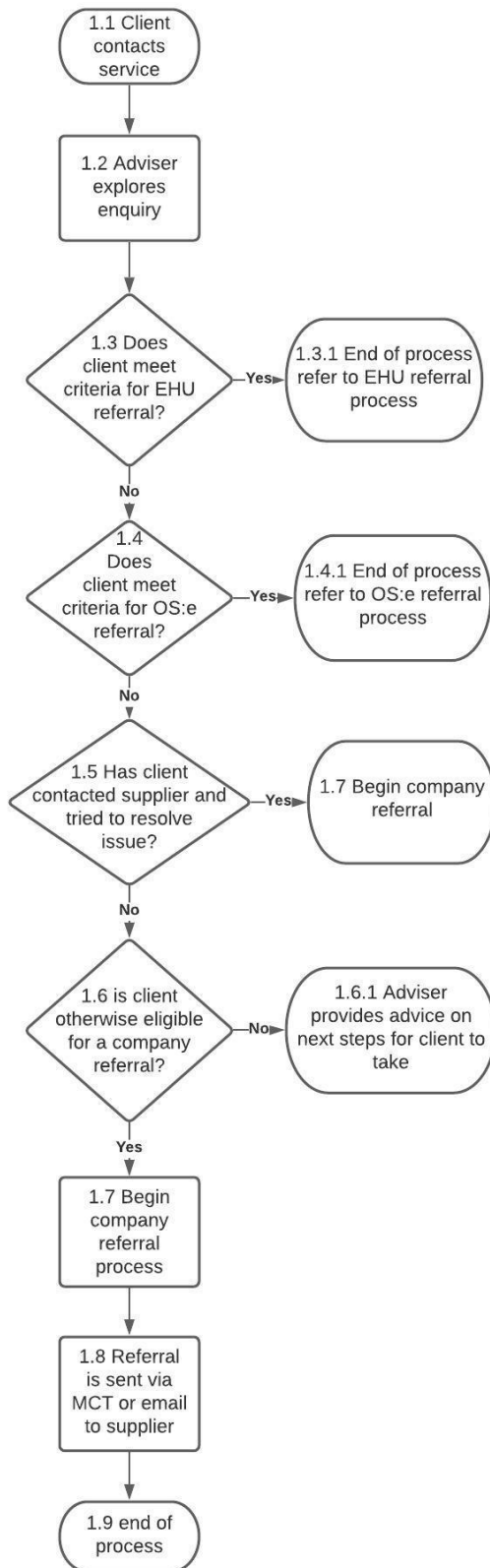
Distribution List

Name	Organisation	Purpose	Date

Contents

Document information	1
Contents	3
1. First section - quick reference	4
2. Second section - main procedure	6

1.0 Quick reference



Guide to quick reference

- 1.1 Client contacts the service.
- 1.2 Adviser explores query. Asks clients questions to identify what the issue is, what actions have been taken, identify any vulnerability.
- 1.3 Adviser checks if the case is relevant for Extra Help Unit (EHU). If so, the case is referred using the relevant process. Adviser is looking for criteria for vulnerability, complexity or disconnection or risk of disconnection.
 - 1.3.1 If the client is eligible for EHU referral, follow agreed process.
- 1.4 Adviser checks if the case is relevant for Ombudsman Services: Energy (OS:E).
 - 1.4 If the client is eligible for OS:E referral follow agreed referral process.
- 1.5 Adviser identifies if client has contacted their supplier.
- 1.6 Adviser identifies if the client is eligible for referral on basis of wider process such as specific circumstances that trigger a company referral.
 - 1.6.1 If the client has not contacted supplier and does not meet other criteria for referral adviser completes advice to client on how to resolve the issue.
- 1.7 If the client is eligible for a company referral this is completed as specified within this process. Explicit consent is sought from the client before proceeding with the referral and noted in the case by selecting "Y" in the company referral consent field. Before making a referral an adviser must be clear that the details of their case will be shared with the company. Only information integral to the case should be recorded. Details such as health, religion, ethnicity, criminal or alleged criminal offences should only be recorded if integral to the case. A referral is completed via mid call transfer (MCT) or by email. Details for each company's referral process is listed on the Referral Agency Signposting Tool.
- 1.8 Once the referral is complete, the process is complete. The company can provide feedback on cases to the operations mailbox if needed.

2.0 Main procedure

2.1 The Citizens Advice consumer service has referral agreements with specific energy companies and Royal Mail. This document outlines the procedures to be followed when making referrals to companies with which we have set up a referral pathway.

2.1.2 It should be noted that not all energy and post companies have these pathways. Domestic energy companies that have 25,000 customers meter points and non domestic energy companies with 10,000 meter point customers are brought onto this procedure. This is part of Section 9 of The Gas and Electricity (Consumer Complaints Handling Standards) Regulations 2008, however any supplier who wants to voluntarily join early without being added to the star rating can be with agreement.

2.1.3 This process covers the procedure and agreement for these referrals between Citizens Advice consumer service and the companies.

2.2 Background and introduction

2.2.1 The Citizens Advice consumer service will deal with 1st tier client contacts relating to the energy and postal industries and provide free, independent, confidential and impartial advice to everyone on their rights and responsibilities. It will value diversity, promote equality and challenge discrimination by way of:

- General, non product or organisation specific, pre-shopping advice requests
- Requests for information on consumer rights
- Requests for practical advice on how individual problems can be resolved and how to gain redress
- Internal signposting to other aspects of the Citizens Advice service
- Referring clients who have been disconnected and/or are defined as vulnerable to the Extra Help Unit (EHU)
- Signposting to other advice agencies e.g. Age UK, Energy Savings Trust
- Complaints and enquiries involving issues with energy companies
- Referring clients to the appropriate energy company to resolve their issue
- Complaints and enquiries involving postal issues
- Referring clients to Royal Mail
- Signposting/referring to the industry redress schemes e.g. Ombudsman Services: Energy

2.2.2 When a client contacts the Citizens Advice consumer service with an issue pertaining to their energy or postal supply, a delivery centre adviser will supply that client with advice and information.

2.2.3 Where possible the adviser will be encouraging them to contact the company involved and try to resolve the issue themselves. The adviser will give them the information and the tools to do this.

2.2.4 When relevant an adviser can refer clients to their energy companies using the referral protocol listed on their company protocols which are stored on the Referral Agency Signposting Tool (RAST). When a referral is made, explicit consent should be obtained from the client and recorded using the Company Referral consent field selecting "Y". Advisers should inform clients that the details of the case notes will be shared with suppliers. Only information integral to the case should be recorded. Details such as health, religion, ethnicity, criminal or alleged criminal offences or any detail that are considered special category data should only be recorded if integral to the case and recorded with explicit consent in the notes.

2.2.5 These referrals will be dealt with by specialist or escalated complaint handling teams within each company. The agreement between the Citizens Advice consumer service and the respective companies as to how these referrals are handled are detailed in this process.

2.2.6 The majority of clients are domestic customers however some companies accept business referrals. This will depend on the company and can be checked on the RAST. Reference to clients in this document covers both domestic and business clients as applicable based on the energy companies protocol.

2.3 Citizens Advice consumer service commitment to companies

2.3.1 The Citizens Advice consumer service agrees to offer advice and guidance to clients who have enquiries or complaints concerning their energy supplier or postal service received through telephone calls, webforms, webchat and letters. All enquiries and complaints will be dealt with in accordance with agreed Citizens Advice quality standards.

2.3.2 Encourage clients to resolve their issues, using the advice given by contacting the appropriate industry company.

2.3.3 Use the referral process to refer clients back to a higher tier complaints authority, within the energy company or postal suppliers customer service team to help resolve issues, if original contact has not settled the matter or in specific referral circumstances and where the client agrees to this. A referral is made with explicit consent from the client to share their case notes. This is recorded in the relevant field in Flare and only information integral to the case is recorded in the notes. Details such as health, religion, ethnicity, criminal or alleged criminal offences or any detail that are considered special category data should only be recorded if integral to the case and recorded with explicit consent in the notes. The energy data collection and coding guidance gives advisers guidance on how to record explicit referral consent with telephone, webchat and letter clients. With webform contacts consent is obtained in a field in the webform.

2.3.4 Identify when a client falls into agreed referral protocol regarding vulnerability and complexity and refer these clients to the EHU (where the client agrees) and the EHU referral process is followed.

2.3.5 Ensure referrals will be made to companies by a mutually agreed method and that commitments regarding response times to email referrals are as detailed in the referral protocols on the RAST.

2.3.6. Identify when an energy client falls into the agreed referral protocol regarding further redress and refer them to Ombudsman Services: Energy (OS:E).

2.3.7 Ensure referrals will be made to the OS:E by a mutually agreed method and that commitments regarding response times are as detailed in the referral protocol.

2.3.8 Keep clients expectations at a reasonable and realistic level throughout the whole process.

2.3.9 Distinguish when a matter is urgent (using the EHU agreed referral protocols) and send referrals without delay clearly marked as such.

2.3.10 Provide reasonable notification of operational changes.

2.3.11 Offer the agreed service provision between 9am – 5pm, Monday to Friday (excluding bank holidays and public holidays).

2.3.12 Provide the service in English and Welsh. Other languages will be available as part of a multi lingual service to be carried out with support agencies.

2.3.13 Ensure that these services are delivered to the highest possible standard, in a timely manner, by:

- Training staff a high standard of customer service
- Keeping staff up to date with developments, particularly pertaining to the energy and postal industry, by a series of measures such as briefing notes and specific training sessions and advice quality feedback.
- Ensuring that all staff are kept fully aware of consumer issues as they impact upon the service
- Treating all data as confidential in line with Citizens Advice consumer service guidelines, including those set out in legislation
- Operating within the data protection legislation of GDPR (UK) and DPA 2018

2.3.14 Provide a service support team (SST) who are contactable via (operations@citizensadvice.org.uk) or phone (0300 5000 922).

2.4 Company commitment to Citizens Advice consumer service

2.4.1 The company will undertake to: receive referrals via mid call transfer (MCT) and by email through a Secure Post Office (SPO).

2.4.2 Companies will agree to answer all MCT referrals within one minute of the adviser connecting with the company's designated telephone line.

2.4.3 Where clients have not been referred via MCT to the company, contact the client referred to them within the agreed timescales detailed in the RAST, this should be no longer than 5 working days.

2.4.4 Agree to the automatic acknowledgement of receipt of referrals through the SPO. This will be automatically received by the consumer service as soon as a referral is opened by the company. Referrals should be opened within one working day of being sent.

2.4.5 Take ownership of the referral and maintain communication with the client. There is no expectation to update the Citizens Advice consumer service on the referral.

2.4.6 Update the RAST if the agreed service cannot be offered, even for a short time due to operational issues. The company will ensure that referrals that have already been sent will be actioned.

2.4.7 Ensure the relevant referral protocol is kept up to date on the RAST and to let the SST at the operations mailbox know if there are any changes to users, such as new users or removing of users.

2.4.8 If there is no access to the RAST, to make the SST at the operations mailbox aware as soon as possible of any changes to the referral protocols.

2.4.9 Provide reasonable notice of any changes or restructuring that may impact on its interaction with Citizens Advice consumer service.

2.4.10 Work with Citizens Advice consumer service to review issues arising from referrals and advice provided.

2.4.11 Attend quarterly meetings to review the processes.

2.4.12 Appoint a named person to act as a contact for the Citizens Advice consumer service, and record this on the RAST protocol under the "Citizens Advice contact details" tab.

2.4.13 Each supplier must appoint a named contact for all Data Protection enquiries and have this person named on the RAST protocol under the "Citizens Advice Contact Details" tab. This person will be contacted for any data protection issues - such as a breach of data, or a client exercising a right of access,

2.5 Referrals

2.5.1 Advisers for the Citizens Advice consumer service will initially advise the client being mindful of potential criteria that enables a client to be referred to the EHU, OS:E or to their company.

2.5.2 If after advising the client first, the adviser then identifies the client meets the criteria for a referral, the client may be referred to either the EHU, OS:E or their company or supplier.

2.5.3 A company referral may be suggested when either the client has followed the advice provided and after a reasonable period of time the supplier has not

resolved their issue or if the enquiry meets the specific circumstances for a referral.

2.5.4 The Citizens Advice consumer service will refer a client to a company using a standard referral if one of the following is the case:

- 2.5.5. They have already progressed through or part-way through the company's complaint procedures and clients are not getting a reasonable resolution. This includes cases where the company has failed to allow appropriate escalation through their internal complaints procedure. Company complaint procedures are available to contact centre advisers on the RAST and should be updated by companies.
- 2.5.6. They are unable to raise a complaint with the company, after concerted efforts, with the company. **Note: this includes cases where clients have been unsuccessful in contacting the company due to busy phone lines.**
- 2.5.7. Following completion of the energy company referral review in 2016, any cases that are coded for a breach of the erroneous transfer charter or marketing issues (including miss-selling or misrepresentation) that were not referred to the OS:E or EHU are also eligible for referral to the supplier. This only relates to energy referrals.

2.5.8 Additionally it is possible to make company referrals if the company requests specific cases to be related to any practice and that is detailed in the relevant supplier protocol on the RAST.

2.5.9 The Citizens Advice consumer service will re-refer the case back to the company if a previous referral has not been actioned or has not resulted in the client being satisfied and there is still value in a referral (bearing in mind the role of the OS:E).

2.6 Means of referral

2.6.1 Unless specified otherwise on the company protocols, advisers will attempt a warm mid-call transfer (MCT) for company referrals. Referrals will either be made by telephone (MCT) or email

2.6.2 These will then be backed up by an email referral ensuring there is a clear audit trail for all referrals. If the client does not wish for their call to be transferred via MCT then the centre will refer via email but make it clear in the case notes why the case was not transferred via a MCT. The adviser will explain to the client how the referral will be sent.

2.6.3 To ensure minimum impact on the Citizens Advice consumer service, companies will agree to answer all MCT referrals within one minute of the adviser connecting with the company's designated free phone telephone line.

2.6.4 Once the contact centre adviser has successfully contacted the company the following information will be provided to the company before the client is transferred. To ensure the client journey is as smooth as possible the following information is given to the receiving company adviser to ensure the transfer is conducted as efficiently as possible:

- Client's name
- Client's postcode and house number
- Client's telephone number
- Client's account number (if available)
- Client's Flare Case reference number
- A description of the complaint and a summary of the resolution required (if known). For example, Mr XXX has an issue with their PPM meter as their card is not charging. They would like a new card as soon as possible.

2.6.5 The energy companies will agree to accept all MCT referrals unless the contact centre adviser has referred to the wrong company.

2.6.6 In all other cases the companies will use the agreed feedback process to inform the centre of any issues they experience with MCT referrals. The feedback process should be used after accepting a referral to ensure the customer journey remains as smooth as possible. Suppliers can complete the feedback form stored on the partner pages of the Citizens Advice website and send it to the operations mailbox.

2.6.7 In the event that the company fails to answer within the required one minute, the referral will be sent via email. The case notes should be clear as to why the case is being emailed without a referral.

2.6.8 If a MCT fails as a result of delayed answer, refusal from receiving adviser, disconnection by supplier or other reasons the adviser should notify their team leader. The team leader can then raise this with SST at the operations mailbox.

2.6.9 When a failed MCT has been passed to SST at the operations mailbox, they should notify the supplier of this copying in the Citizens Advice Energy team, as

per the duty business process process. Contact details for the supplier can be found on the RAST.

2.6.10 In instances where the contact centre adviser initiates an MCT referral to the wrong company, the contact centre adviser will speak again to the client and explain the appropriate next steps (either MCT or an email to the appropriate company).

2.6.11 Where a contact is received via inbound mail and requires a company referral the contact centre adviser should contact the consumer to seek consent for the referral. Where the client provides a telephone number and has not specified that their preferred contact method is “letter” then the contact centre adviser may seek consent from the client via the telephone and offer to MCT the case at the end of the call. When consent is obtained it is recorded in the relevant field in Flare.

2.6.12 Where a contact is received via webform and requires a company referral the contact centre adviser should check the consent for the referral in the Flare case record. The client is asked on the webform if they give permission for their details to be shared with a third party, if they consent to this field, a referral can be sent without checking with the client. If they do not consent, where the client provides a telephone number and has not specified that their preferred contact method is “email” then the contact centre adviser may seek consent from the client via the telephone and offer to MCT the case at the end of the call.

2.6.13 In the majority of other referral cases from calls, webforms, webchat and inbound mail, the Citizens Advice consumer service will email company referrals to the company with a commitment that they will contact the client within an agreed period of no more than 5 working days. For full details of these commitments, contact centre advisers should refer to the appropriate company referral protocol on the RAST.

2.6.14 Regardless of method of referral (phone or email) the supplier will receive the case notes via a secure post office. The case notes will contain the following information.

Client Details	Case Details
Case ID	Address serviced
Title	Primary supplier

First name	Secondary supplier
Last name	Supplier type
Address	Customer type
Postcode	Payment method
Telephone	Selling Method
Email	Account number
DPA Permission	Electricity supply number
Primary person on account	Gas meter supply number
Address type	Company complaint number
Third Party Details: Title	Customer off supply
Third Party Details: First name	First time contacting company?
Third Party Details: Last name	Issue details
Third Party Details: Address	Advice given
Third Party Details: Postcode	Action taken
Third Party Details: Telephone	Call MCT
Third Party Details: Email	Potential vulnerable or urgent
Third Party Details: Primary person on account	Issue code
	Method of contact
	Referral consent
	Repeat referral
	Referring Centre

2.6.15 Under the changes to Data Protection legislation which came into force May 2018 it is important that advisers are clear with clients that any personal information that is recorded on the case will be shared with the supplier and if the client does not consent to this, their personal information should not be noted in the case notes.

Any special category data recorded should be done so with the client’s consent, and client’s consent should be noted. The adviser should explain what special category data is to the client. The Information Commissioner’s Office defines special category data in the following categories:

- race
- ethnic origin
- politics
- religion
- trade union membership
- genetics
- biometrics (where used for ID purposes)
- health
- sex life
- sexual orientation

Only record special category data when it is necessary for the case, for example in cases of discrimination or if a health issue is relevant to a case.

2.7 Case coding requirements and monitoring

2.7.1 The coding of referrals will be completed in the following way:

- 2.7.2 When a successful MCT referral is made a referral will be attached and be coded as “Company Referral” and “Mid call transfer – Successful”. If the referral is a repeat referral then advisers should select Y for “repeat referral”.
- 2.7.3 When an unsuccessful MCT referral is made, a referral will be attached and be coded as “Company Referral” and “Mid call transfer – Unsuccessful. If the referral is a repeat referral then advisers should select Y for “repeat referral”.
- 2.7.4 In some cases a referral is sent via email. This is used generally for webform, webchat or letter clients with explicit consent. This may also be the case when correcting a referral error such as not coding the referral when one is identified and consent obtained.

Success of MCT	Referral type	Referral method
Successful	Company referral	M1 - MCT success
Unsuccessful	Company referral	M2 - MCT unsuccessful
Email	Company referral	E - Email

2.7.5 In energy cases where there are two companies relating to a case the primary company should be the supplier who can resolve the issue, for example

with cases of erroneous transfer, the supplier who the client is being transferred to and the secondary company the supplier that the client is being transferred from.

2.7.6 Additionally the completion of relevant fields should follow the Energy Data Collection and Coding and the Post Data Collection and Coding business processes as appropriate.

2.7.8 Companies can provide feedback to delivery centres on referred cases. Feedback can include issues such as the information was collected incorrectly or the incorrect advice was given. The feedback will be implemented and used to identify training needs within the delivery centre. A copy of the feedback form is on the partner pages. The form is called “Consumer energy and post feedback form.”

2.7.9 Monitoring will include:

- A point of contact within each delivery centre that can deal with day to day, operational issues, e.g. a referral that has been sent with no contact details.
- Regular meetings with companies to discuss ongoing operational issues and other matters can be discussed with the delivery centre and the Citizens Advice operations team.

2.7.10 Advisers are empowered to use the data enquiry services Ecoes (for electricity customers) and Xoserve (for gas) if there is any ambiguity as to who to send the company referral to. This may happen if the client is unclear on the supplier, in cases of erroneous transfer or if company names are very similar.

2.8 Incorrect referrals process

2.8.1 There may be instances when delivery centre advisers send a referral to the wrong company or supplier. In these cases, the company in question should contact the operations mailbox immediately in order for the case to be reviewed. This is the only circumstance in which a company can dispute a referral. This feedback should be sent to the operations mailbox on operations@citizensadvice.org.uk, quoting the consumer service case reference.

2.8.2 The delivery centre should then ensure that changes to the case are carried out and, if appropriate, a referral is sent to the correct company.

2.8.3 Any company that receives an incorrect referral of this nature should ensure all records are deleted from system and any other information that contains clients details

2.8.4 If a supplier notifies Citizens Advice operations of an incorrect referral, this will be checked if upheld this will also be passed to the Data Unit to ensure this is reflected in complaints data

Free, confidential advice. Whoever you are.

We help people overcome their problems and campaign on big issues when their voices need to be heard.

We value diversity, champion equality, and challenge discrimination and harassment.

We're here for everyone.

The Citizens Advice consumer service provides free, confidential and impartial advice on energy issues in England, and Wales.

Citizens Advice

200 Aldersgate Street
London EC1A 4HD

Telephone: 03000 231 231

www.citizensadvice.org.uk

www.adviceguide.org.uk

Citizens Advice is an operating name of The National Association of Citizens Advice Bureaux.
Registered charity number 279057.

