

Complaints Procedure

Introduction

The purpose of this complaints procedure is to help customers who wish to make a complaint. This document will guide the customer through the process we follow in handling complaints.

Underpinning the procedure is the **ethos** of **'getting it right first time'**. Our emphasis is firmly on quicker, simpler and more streamlined complaints handling with local, early resolution by empowered and well trained staff. Our procedure is designed to address customer dissatisfaction by providing a quick, fair and considered response to complaints, explaining clearly the reasons for any disagreement we may have with service users, and using the lessons we have learned from complaints to improve our services.

We recognise that some of our subscribers may be vulnerable or need extra help with their service or to raise a complaint. Our staff are trained to recognise such circumstances and encourage additional authorised account holders to be added to the account as well as using the most appropriate means of communication for the circumstance.

This document should be read in conjunction with our **Code of Conduct**, which is available at <https://www.intouchsystems.co.uk/shares/its-code-of-conduct.pdf>

Our complaints procedure complies with section C4 and C5 of Ofcom's customer complaints code guidance dated 30 July 2018.

Ofcom class InTouch Systems as a **'Communications Provider'** and as such a **'Regulated Provider'**.

This complaints procedure covers complaints received from the following, described by Ofcom as **'Relevant Customers'**,

- Residential - 'Domestic customers',
- Small Business Customers[1].

How we will deal with your complaint

We adopt a four stage process for handling complaints made to us.

Stage 1 - Front line resolution

Our front line team handle issues that are straightforward and easily resolved, typically those requiring little or no investigation. We aim to resolve such issues within 5 working days and resolution may include any one or more of the following actions:

1. 'On-the-spot' apology,
2. explanation,
3. or other action to resolve the complaint quickly.

In exceptional circumstances it may take longer than 5 days. Our front line staff are trained to deal with such complaints and in some circumstances they may pass on your complaint to the appropriate point for frontline resolution.

Your complaint will remain open until we have received confirmation from you that you are satisfied with our response or 28-days has elapsed from the date of the response.

We will use complaint details, outcomes and resolutions to help continuously to improve our services.

Stage 2 - Investigation and communicating the outcome

We will initiate a formal investigation for issues that have not been resolved at the frontline stage, or that are complex, serious or 'high risk'.

We aim to provide a definitive response within 20 working days following a thorough investigation of the points raised. Our response will be signed off by senior management; our senior management take an active interest in complaints and use information gathered to improve our services.

We will communicate the outcome using your preferred method of contact.

Your complaint will remain open until we have received confirmation from you that you are satisfied with our response to you, or 28-days has elapsed from the date of the response.

Stage 3 - Independent External Review

You have the opportunity to escalate your complaint for issues that we are unable to resolve at the front line or by investigation. We are members of the industry body representing wireless networks, **UKWISPA**. If you wish to escalate your complaint to this organisation we will give them a summary of the case to date and provide you a copy of the summary together with their contact details so you can directly monitor the progress of your case.

UKWISPA is committed to providing a **response within 2 weeks** of being notified of the detail of the complaint .

Phone: 03333 660036

Email: info@ukwispa.org

Address: Member Complaints, UKWISPA, 4 Croftside Court, Cullingworth, Bradford, BD13 5DE

Stage 4 - Access to Alternative Dispute Resolution

If you disagree with the Independent External Review then you have then have the opportunity to further escalate your complaint to the Alternative Dispute Resolution Scheme (ADR).

ADR: Ombudsman Services

Phone: 0330 440 1614

Email: osenquiries@oscommunications.org

Address: Ombudsman Services: Communications PO Box 730 Warrington WA4 6WU

How to Make a Complaint

You can initiate a complaint by calling our customer service department, emailing us, online or writing to us. We do not differentiate complaints by how they are raised so please use the most appropriate contact method for making your complaint:

Call us on this number:	01603 425209
Email:	enquiries@intouchsystems.co.uk
Online:	www.itswisp.co.uk/contact or www.intouchsystems/contact
Write to:	InTouch Systems 36 Hurricane Way Norwich NR6 6HU

How we will respond

We will respond in line with our 4 step process described above, in the timescales we have committed to.

Our preference is to respond to you by email, however if you prefer an alternative method of contact please inform us when making your complaint.

After your confirmation that the complaint is resolved we will email you with a summary of the final outcome.

Unresolved Complaints

Independent External Review (IER)

Unresolved complaints will be referred initially for an Independent External Review (IER) of the complaint.

The IER for InTouch Systems is **UKWISPA**.

An IER email will be sent by us to the complainant in the following circumstances;

- a) We have told the complainant of the outcome of its investigation into the complaint;
- b) The complainant has told us that they consider the proposed outcome does not resolve the complaint to their satisfaction; and

- c) We do not intend to take additional steps to resolve the complaint to the complainant's satisfaction that would produce a different outcome.

It is usual for the IER information to be contained within the complaint outcome notification.

UKWISPA response time is up to 2-weeks from receiving the case file and the outcome will be communicated both to the complainant and us.

Alternative Dispute Resolution (ADR)

If the complainant does not accept the findings of the IER, or the complaint remains **unresolved after 8-weeks** since the date on which the complaint was first received, then we will issue an Alternative Dispute Resolution (ADR) email to the complainant.

The ADR for InTouch Systems is **Ombudsman Services**.

An ADR email will be sent by us to the complainant in the following circumstances;

- a) We have told the complainant of the outcome of its investigation into the complaint;
- b) The complainant has told us that they consider the proposed outcome by the IER does not resolve the complaint to their satisfaction; and
- c) We do not intend to take additional steps to resolve the complaint to the complainant's satisfaction that would produce a different outcome.

Closing Complaints

We will not close a complaint unless;

- a) The complaint has been resolved in accordance with the circumstances set out below;
 - I. The Complainant has expressly agreed that the complaint has been resolved to the complainant's satisfaction;
 - II. It is reasonable for us to conclude that the Complaint has been resolved to the Complainant's satisfaction because;
 - III. We have informed the Complainant of the outcome of our investigation and complied with our obligations as set out in this document; and
 - IV. The Complainant has not come back to us within 28-days to say they consider the Complaint remains unresolved
- b) An ADR letter has been issued by us to the Complainant
- c) It is reasonable for us to consider the Complaint to be frivolous or vexatious.

Record Keeping and Monitoring

For each complaint received, we will keep a record in writing of:

- a) The date on which the Complaint was received;
- b) How the Complaint was made (for example, by email or by phone);
- c) The identity of and contact details of the Complainant;
- d) A description of what the Complaint is about;
- e) All communications made or received between us and the Complainant regarding the Complaint, including, as a minimum:
 - I. The date on which the communication was made or received;
 - II. How the communication was made or received (for example, by email or by phone);
 - III. A description of what was contained in the communication (for example, advice given and/or action proposed to be taken and/or action agreed with the Complainant to be taken, to resolve the Complaint);
 - IV. copies of any written communication; and
 - V. the date on which the Complaint was resolved or otherwise closed.

Where the Complaint is resolved because:

- a) The Complaint expressly agrees that the Complaint has been resolved to the Complainant's satisfaction, we will keep a record in writing of that express agreement;
- b) We will keep a record showing the basis for concluding the Complaint has been resolved and that it complies with this guidance.

Where the Complaint is closed by us on the basis of:

- a) An ADR letter being issued and the relevant time passes, then a copy of the ADR letter must be retained;
- b) We consider the Complaint to be frivolous or vexatious, a record must be kept detailing the reasons why.

Our management team will oversee all complaints that are logged and use the finding to continuously improve the service and communication to our customers. We will also encourage feedback on our complaints handling using an online questionnaire.