

# Complaints Code of Practice

## For customer service and complaints handling

### Version

Date	Changes	Approved
15.10.18	Original draft as amended.	S C Hayhurst
16.10.18	Minor address update.	D P Burns

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## 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.

To add an additional authorised account holder please use this [link](#).

This document should be read in conjunction with our **Code of Conduct** which is available at <http://www.boundlessnetworks.co.uk/downloads/>

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

Ofcom class Boundless Networks 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<sup>1</sup>.

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<sup>1</sup> Ofcom define a Small Business Customer as employing 10 or less employees.

## 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](mailto: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](mailto: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:

<b>Call us on this number:</b>	01138 941 951
<b>Email:</b>	<a href="mailto:customerservice@boundlessnetworks.co.uk">customerservice@boundlessnetworks.co.uk</a>
<b>Online:</b>	<a href="https://boundlessnetworks.wufoo.com/forms/z1qjphky1sxgcox/">https://boundlessnetworks.wufoo.com/forms/z1qjphky1sxgcox/</a>
<b>Write to:</b>	Kate Outram, Customer Services Manager, Boundless Networks Ltd, Hangar 1, Southside Aviation Centre, Yeadon, Leeds, LS19 7UG

## 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 Boundless Networks 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 Boundless Networks 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.

## Annex A

### Deadlock Example Letter (IER)

Date:

Dear Sir/Madam,

#### **Final Position/Deadlock Letter**

I am sorry that we have been unable to resolve this matter to your satisfaction. We have exhausted our internal complaints process. This is our final position and we are now at deadlock.

#### **What we cannot agree on and why**

[explain your position]

#### **Our final position**

[explain your final offer]

#### **Taking your complaint further**

You now have the right to refer your complaint for an Independent External Review by UKWISPA if you want to. You have up to 8 weeks from first communicating the complaint to do this. If you do not respond at the end of the 8 weeks we will issue you with a further deadlock letter providing details of the Ombudsman Services.

The Independent External Reviewer's role is to help to resolve complaints. The service is free to use and is independent. It has the authority to resolve complaints by requiring;

- a) an apology;
- b) an explanation of what went wrong;
- c) a practical action to be taken to correct the problem; and,
- d) a financial award.

If you accept the External Reviewer's decision it is binding on us and we must put in place any remedy that is required. You can decline the decision if you want to and you will not be held to it or charged.

The contact details for UKWISPA are given below. If you can, it is usually best to phone and state that you have received this deadlock letter and require an Independent External Review of the Complaint.

#### **UKWISPA contact details:**

**Phone:** 03333 660036

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

**Email:** [info@ukwispa.org](mailto:info@ukwispa.org)

**Website:** <https://ukwispa.org/>

Yours faithfully,

Name

Position in Company



## Annex B

### Deadlock Example Letter (ADR)

Date:

Dear Sir/Madam,

#### **Final Position/Deadlock Letter**

I am sorry that we have been unable to resolve this matter to your satisfaction. We have exhausted our internal complaints process. This is our final position and we are now at deadlock.

#### **What we cannot agree on and why**

[explain your position]

#### **Our final position**

[explain your final offer]

#### **Taking your complaint further**

You now have the right to refer your complaint to Ombudsman Services if you want to. You have up to 12 months to do this.

The ombudsman's role is to help to resolve complaints. The service is free to use and is independent. It has the authority to resolve complaints by requiring; an apology; an explanation of what went wrong; a practical action to be taken to correct the problem; and, a financial award. If you accept the ombudsman's decision it is binding on us and we must put in place any remedy that is required. You can decline the decision if you want to and you will not be held to it or charged.

The contact details for Ombudsman Services are given below. If you can, it is usually best to phone and you should say that you have received this deadlock letter.

#### **Ombudsman Services contact details:**

**Phone:** 0330 440 1614  
**Textphone:** 0330 440 1600  
**Post:** PO Box 730, Warrington, WA4 6WU  
**Email:** [osenquiries@os-communications.org](mailto:osenquiries@os-communications.org)  
**Website:** [www.ombudsman-services.org](http://www.ombudsman-services.org)

Yours faithfully,

Name  
Position in Company

## Appendix C

### Eight Week Letter

Date:

Dear Sir/Madam,

#### **Ombudsman Services – eight week notification letter**

It has been eight weeks since you first told us about your complaint. You now have the right to refer your complaint to Ombudsman Services if you want to.

The ombudsman's role is to help to resolve complaints. The service is free to use and is independent. It has the authority to resolve complaints by requiring; an apology; an explanation of what went wrong; a practical action to be taken to correct the problem; and, a financial award. If you accept the ombudsman's decision it is binding on us and we must put in place any remedy that is required. You can decline the decision if you want to and you will not be held to it or charged.

The contact details for Ombudsman Services are given below. If you can, it is usually best to phone and you should say that you have received this eight-week letter.

In the meantime, we will continue to work on your complaint. We are very sorry that we have been unable to resolve it as quickly as we would like.

A member of our complaints team may have tried to contact you recently to update you on our progress. We are doing everything we can to resolve your issue and we will contact you again as soon as we have any further information.

If you would like to speak to us about your complaint, please call us on 01138 941951. We are open Monday – Friday 08:30 – 17:00.

We also operate an out of hours call back service, Monday-Friday 17:00 – 20:00, and at weekends 10:00-16:00.

#### **Ombudsman Services contact details:**

**Phone:** 0330 440 1614  
**Textphone:** 0330 440 1600  
**Post:** PO Box 730, Warrington, WA4 6WU  
**Email:** [osenquiries@os-communications.org](mailto:osenquiries@os-communications.org)  
**Website:** [www.ombudsman-services.org](http://www.ombudsman-services.org)

Yours faithfully,

Name  
Position in Company

## Appendix D

### Apology and Resolution Letter

Date:

Dear Sir/Madam,

#### **Apology and Resolution**

I have personally completed a review of your complaint and would like to firstly apologise for the matter escalating to the point that you felt you needed to make a formal complaint. Most issues are resolved at first contact with one of our highly trained support staff and we are sorry that was not the case in this instance.

Please be assured that we do take great pride in the service our company and staff provide to our subscribers and please take comfort that we will learn from this experience.

#### **What Happened and Why**

[explain your position]

#### **Our resolution offer**

[explain your final offer]

#### **What to you need to do**

If you are happy with our explanation and resolution offer then please confirm to us using your preferred method of contact. If we do not hear back from you within 28-days from the date of this letter then we will assume you consider the matter closed.

Yours faithfully,

Name

Position in Company