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## COMPLAINTS HANDLING PROCEDURE

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### 1. Definitions and Interpretation

1.1 In this Complaints Handling Procedure the following expressions have the following meanings:

<b>“Appeal”</b>	means a request from a Customer to escalate a Complaint to Level Three following an unsatisfactory outcome at Level Two;
<b>“Appeal Handler”</b>	means an employee of Happy Energy Solutions Ltd working at Management level who will liaise between the Customer and the Directors with respect to Level Three Complaints;
<b>“Business Day”</b>	means, any day (other than Saturday or Sunday) on which ordinary banks are open for their full range of normal business in England;
<b>“Complaint”</b>	means a complaint about goods and or services sold by Happy Energy Solutions Ltd, about our customer service, or about our employees or subcontractors;
<b>“Complaints Policy”</b>	means our customer complaints policy, available from our website;
<b>“Complaint Reference”</b>	means a unique code assigned to a Complaint that will be used to track that Complaint;
<b>“Customer”</b>	means a customer of Happy Energy Solutions Ltd. and includes potential customers (no purchase necessary);
<b>“Data Protection Policy”</b>	means our data protection policy, available from our website;
<b>“Decision Letter”</b>	means a letter sent by a Complaint Handler or Appeal Handler to a Customer informing that Customer of the outcome of their Complaint;
<b>“External Resolution”</b>	means the referral of a Complaint to an external body or organisation for resolution by a Customer if that Customer is not satisfied with the outcome at Level Three;
<b>“Investigation Report”</b>	means the report detailing the investigation and assessment of a Complaint;
<b>“Level One”</b>	means the first stage in this Complaints Handling Procedure under which Complaints will be handled by a Level One Complaint Handler;
<b>“Level One Complaint Handler”</b>	means an employee of Happy Energy Solutions Ltd. who will handle Level One Complaints;

<b>“Level Two”</b>	means the second stage in this Complaints Handling Procedure under which a Customer may appeal the outcome of a Level One Complaint and under which Complaints will be handled by a Level Two Complaint Handler;
<b>“Level Two Complaint Handler”</b>	means an employee of Happy Energy Solutions Ltd. who will handle Level Two Complaints;
<b>“Level Three”</b>	means the third stage in this Complaints Handling Procedure under which a Customer may appeal the outcome of a Level Two Complaint and under which Complaints will be handled by an Appeal Handler;
<b>“Recommendation”</b>	means the recommended resolution to a Complaint; and
<b>“Resolution Action”</b>	means the available actions to be taken in response to a Complaint as detailed in Section 9.

## 2. What this Complaints Handling Procedure Covers

- 2.1 This Complaints Handling Procedure applies to Complaints pertaining to the sale of goods and or the provision of services by Happy Energy Solutions Ltd, to our customer service and to our employees or subcontractors.
- 2.2 For the purposes of this Complaints Handling Procedure, any reference to Happy Energy Solutions also includes our employees and subcontractors.
- 2.3 Complaints may relate to any of our activities and may include (but not be limited to):
  - 2.3.1 The quality of our customer service;
  - 2.3.2 The behaviour and/or professional competence of our employees or subcontractors;
  - 2.3.3 Delays, defects or other problems associated with the sale of goods;
  - 2.3.4 Delays, defects, poor workmanship or other problems associated with the provision of services.
- 2.4 The following do not constitute Complaints. Customers raising such questions or matters should be directed to the appropriate department:
  - 2.4.1 General questions about our goods and or services;
  - 2.4.2 Matters concerning contractual or other legal disputes;
  - 2.4.3 Formal requests for the disclosure of information including, but not limited to, those made under the Data Protection Act;

## 3. Receipt and Recording of Complaints

- 3.1 Customers may make Complaints to Happy Energy Solutions Ltd. using any of the following methods:
  - 3.1.1 In writing, addressed to The Complaints Department, Unit 1 New Road, Perranporth, TR6 0DL;

- 3.1.2 By email, addressed to [hello@happyenergy.co.uk](mailto:hello@happyenergy.co.uk);
- 3.1.3 By contacting us by telephone on 01872 574900.
- 3.2 Upon receipt of Complaints, the following steps should be taken within three Business Days:
  - 3.2.1 If a written request is received by post or email the Level One Complaint Handler must upload a copy of the correspondence to the Customer record on our CRM system;
  - 3.2.2 If request is made by telephone, the Complaint Handler must make detailed notes of the conversation and the request to make a complaint on the Customer record on our CRM system.
- 3.3 All Complaints must be given a Complaint Reference and forwarded to an appropriate Level One Complaint Handler, selected in accordance with Section 6.1 within one Business Day.
- 3.4 All Complaints must be acknowledged in writing within three business days of receipt by the Complaint Handler. The acknowledgement should inform the Customer of their Complaint Reference, their assigned Level One Complaint Handler and should include copies of Happy Energy Solution Ltd.'s Customer Complaint Policy and this Complaints Handling Procedure.

#### **4. Complaint Information**

- 4.1 Customers are advised in our Complaints Policy that the following information should be provided in as much detail as is reasonably possible when making a Complaint:
  - 4.1.1 The Customer's name, address, telephone number and email address, indicating any preferred method of communication;
  - 4.1.2 If the Customer is being represented by a third party, the information set out in Section 4.1.1 should be provided in reference to both parties;
  - 4.1.3 If the Complaint relates to a particular transaction, the invoice number should be provided;
  - 4.1.4 If the Complaint relates to a particular employee or subcontractor, the name and, where appropriate, position of that employee or subcontractor;
  - 4.1.5 Further details of the Complaint including, as appropriate, all times, dates, events, and people involved;
  - 4.1.6 Details of any documents or other evidence on which the Customer wishes to rely in support of the Complaint;
  - 4.1.7 Details of how the Customer would like Happy Energy Solutions Ltd. to resolve the Complaint. Whilst we undertake to make all reasonable efforts to accommodate such requests, however, we are not bound to take any action beyond that which we may be contractually or otherwise legally obliged to take.
- 4.2 If the information detailed in Section 4.1 is missing, insufficiently detailed, or incomplete, the Level One Complaint Handler should contact the Customer within two Business Days of receipt of the Complaint to request further information.

## 5. **Complaint Levels**

- 5.1 Happy Energy Solutions Ltd. operates a three-stage complaints handling procedure. Upon receipt, all new Complaints should be handled in accordance with the Level One procedure set out in Section 6 below. It is our policy to use all reasonable endeavours to resolve all Complaints to Customers' satisfaction at Level One.
- 5.2 If a Customer is not satisfied with the resolution of their Complaint at Level One, he/she may request that the Complaint is escalated to Level Two at which point the Complaint should be handled in accordance with the Level Two procedure set out in Section 7 below.
- 5.3 If a Customer is not satisfied with the resolution of their Complaint at Level Two, he/she may request that the Complaint is escalated to Level Three in the form of an Appeal at which point the Complaint should be handled in accordance with the Level Three procedure set out in Section 8 below.
- 5.4 If a Customer is not satisfied with the resolution of their Complaint at Level Three, he/she has the option of referring the matter to Stroma for External Resolution as detailed in Section 10 below.

## 6. **Level One Complaints**

- 6.1 The following staff members are qualified and eligible Level One Complaint Handlers for Level One Complaints:
  - Senior Operational Executive
  - Senior Energy Advisor
  - Technical Operational Executive
- 6.2 Upon receipt of a Complaint, the Level One Complaint Handler shall consider the Complaint and make a decision within ten Business Days whether to:
  - 6.2.1 Investigate the Complaint fully if it is considered to be valid, in which case the procedure should resume from Section 6.3; or
  - 6.2.2 Dismiss the Complaint if it is considered to be invalid, in which case the Level One Complaint Handler should inform the Customer of his or her decision in writing within fifteen Business Days.
- 6.3 Subject to delays arising from circumstances beyond his or her reasonable control (including, but not limited to, delays in other persons responding to communications), the Level One Complaint Handler shall have a period of fifteen Business Days in which to fully investigate the Complaint and to decide upon an Resolution Action(s).
- 6.4 If the Complaint relates to (a) particular employee(s) or subcontractor(s) (a "Complainee" or "Complainees"), the Level One Complaint Handler shall inform the Complainee(s) in question of the Complaint and arrange meetings and or telephone calls as required to discuss the Complaint. In such cases, the Complainee(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complainee(s) directly regarding the Complaint (which they are requested not to do in our Complaints Policy), the Complainee(s) should respectfully refuse to discuss the matter, referring the Customer to Section 5.2.3 of our Complaints Policy. Any such contact should be reported to the Level One

Complaint Handler.

- 6.5 If the Level One Complaint Handler requires additional information or evidence in support of the Complaint, the Level One Complaint Handler shall contact the Customer using the Customer's preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint, as per Section 5.2.4 of our Complaints Policy.
- 6.6 If a Customer is unable or unwilling to provide information or evidence requested under Section 6.5, the Level One Complaint Handler must nevertheless use all reasonable endeavours to resolve the Complaint. If, however, the Level One Complaint Handler considers that it is not possible to uphold the Complaint in the absence of the requested information or evidence, he or she may close the Complaint and inform the Customer of the outcome in accordance with Sections 6.9 to 6.12.
- 6.7 The Level One Complaint Handler shall examine and evaluate the Complaint, taking full account of all relevant statements, information, evidence and circumstances and shall maintain full objectivity and fairness at all times.
- 6.8 Following his/her examination of the Complaint, the Level One Complaint Handler shall reach a decision within the time period set out in Section 6.3 (subject to the exceptions noted therein). Resolution Actions that may be chosen are set out in Section 9.
- 6.9 Upon reaching a final decision under Section 6.8, , the Level One Complaint Handler shall send an Investigation Report and Decision Letter to the Customer by first class post or by email, as appropriate. Decision Letters shall set out the decision, the Resolution Action(s), and shall remind the Customer of their right to escalate the Complaint to Level Two. Electronic copy/copies of the Investigation Report and Decision Letter should be uploaded to the Customer record on our CRM system.
- 6.10 If a delay either occurs or is considered likely to occur at any stage of the Level One procedure, the Level One Complaint Handler shall inform the Customer using the Customer's preferred communication method. The Customer should be informed of the length or likely length of the delay and the reasons therefor.
- 6.11 The Customer shall have a time limit of five Business Days within which to request that the Complaint be escalated to Level Two.
- 6.12 Upon receipt of an escalation request, the following steps should be taken immediately by the Level One Complaint Handler:
  - 6.12.1 If a written request is received by post or email the Level One Complaint Handler must upload a copy of the correspondence to the Customer record on our CRM system, and forward the original Complaint to the Level Two Complaint Handler;
  - 6.12.2 If request is made by telephone, the Complaint Handler must make detailed notes of the conversation and the request to escalate the complaint on the Customer record on our CRM system. The case must then be referred to the Level Two Complaint Handler.
- 6.13 All escalation requests must be forwarded to an appropriate Level Two Complaint Handler, selected in accordance with Section 7.1 within one Business Days.

- 6.14 All escalation requests must be acknowledged in writing within two business days of receipt by the Level Two Complaint Handler. The acknowledgement should inform the Customer of their assigned Level Two Complaint Handler.

## 7. Level Two Complaints

- 7.1 The following staff members are qualified and eligible Level Two Complaint Handlers for Level Two Complaints:

- 7.1 The following staff members are qualified and eligible Level Two Complaint Handlers for Level Two Complaints:

Call Centre Manager,  
Compliance Manager,  
Health & Safety Manager,  
Sales & Proposals Manager,  
Surveyor and Heating Manager.

- 7.2 Upon receipt of an escalation request, the Level Two Complaint Handler shall consider the Complaint and make a decision within ten Business Days whether to:

7.2.1 Investigate the Complaint fully if it is considered to be valid, in which case the procedure should resume from Section 7.3; or

7.2.2 Dismiss the Complaint if it is considered to be invalid, in which case the Level Two Complaint Handler should inform the Customer of his/her decision in writing within fifteen Business Days. If the Complaint is so dismissed, the Complaint may be dismissed in its entirety, or the Resolution Action(s) from Level One may stand.

- 7.3 Subject to delays arising from circumstances beyond his/her reasonable control (including, but not limited to, delays in other persons responding to communications), the Level Two Complaint Handler shall have a period of fifteen Business Days in which to fully investigate the Complaint and to decide upon appropriate Resolution Action(s).

- 7.4 If the Complaint relates to (a) particular Complainee(s), the Level Two Complaint Handler shall inform the Complainee(s) in question of the Appeal and arrange meetings and or telephone calls as required to discuss the Complaint. In such cases, the Complainee(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complainee(s) directly regarding the Complaint (which they are requested not to do in our Complaints Policy), the Complainee(s) should respectfully refuse to discuss the matter, referring the Customer to Section 5.3.3 of our Complaints Policy. Any such contact should be reported to the Level Two Complaint Handler.

- 7.5 If the Level Two Complaint Handler requires additional information or evidence in support of the Complaint, the Level Two Complaint Handler shall contact the Customer using the Customer's preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint, as per Section 5.3.4 of our Complaints

Policy.

- 7.6 If a Customer is unable or unwilling to provide information or evidence requested under Section 7.5, the Level Two Complaint Handler must nevertheless use all reasonable endeavours to resolve the Complaint. If, however, the Level Two Complaint Handler considers that it is not possible to uphold the Complaint in the absence of the requested information or evidence, he or she may close the Complaint and inform the Customer of the outcome in accordance with Sections 7.9 to 7.12.
- 7.7 The Level Two Complaint Handler shall examine and evaluate the Complaint, taking full account of all relevant statements, information, evidence and circumstances and shall maintain full objectivity and fairness at all times.
- 7.8 Following his/her examination of the Complaint, the Level Two Complaint Handler shall reach a decision within the time period set out in Section 7.3 (subject to the exceptions noted therein). Resolution Actions that may be chosen that may be chosen are set out in Section 9.
- 7.9 Upon reaching a decision under Section 7.8, the Level Two Complaint Handler shall send an Investigation Report and Decision Letter to the Customer by first class post or by email, as appropriate. Decision Letters shall set out the decision and the Resolution Action, and shall remind the Customer of their right to escalate the Complaint to Level Three. Electronic copy/copies of the Investigation Report and Decision Letter should be uploaded to the Customer record on our CRM system.
- 7.10 If a delay either occurs or is considered likely to occur at any stage of the Level Two procedure, the Level Two Complaint Handler shall inform the Customer using the Customer's preferred communication method. The Customer should be informed of the length or likely length of the delay and the reasons therefor.
- 7.11 The Customer shall have a time limit of five Business Days within which to make an Appeal if he/she wishes to escalate the Complaint to Level Three.
- 7.12 Upon receipt of an Appeal, the following steps should be taken immediately by the Level Two Complaint Handler:
  - 7.12.1 If a written Appeal is received by post or email, the Level Two Complaint Handler must upload a copy of the correspondence to the Customer record on our CRM system,
  - 7.12.2 If an Appeal is made by telephone, the Level Two Complaint Handler must make detailed notes of the conversation and the request to escalate the complaint on the Customer record on our CRM system.
- 7.13 All Appeals must be forwarded to an appropriate Appeal Handler, who shall liaise with the Company Directors, selected in accordance with Section 8.1 within one Business Day.
- 7.14 All Appeals must be acknowledged in writing within two business days of receipt by the Level Two Complaint Handler. The acknowledgement should inform the Customer of their assigned Appeal Handler.

### **Level Three Complaints**

- 7.1 The following staff members are qualified and eligible Appeal Handlers for Level Three Complaints:

Senior Operations Manager,  
Senior Compliance Manager,  
Company Director.

- 7.2 Upon receipt of an Appeal, the Appeal Handler shall forward the Complaint and all accompanying information, evidence and documentation (including, but not limited to, Investigation Reports) to the Senior Manager, who shall consider the Appeal and make a decision within ten Business Days whether to:
- 7.2.1 Investigate the Complaint fully if it is considered to be valid, in which case the procedure should resume from Section 8.3; or
  - 7.2.2 Dismiss the Complaint if it is considered to be invalid, in which case the Appeal Handler should inform the Customer of the Senior Managers decision in writing within fifteen Business Days. If the Complaint is so dismissed, the Complaint may be dismissed in its entirety, or the Resolution Action from Level Two may stand.
- 7.3 Subject to delays arising from circumstances beyond their reasonable control (including, but not limited to, delays in other persons responding to communications), the Senior Manager shall have a period of fifteen Business Days in which to fully investigate the Complaint and to decide upon an appropriate Resolution Action.
- 7.4 If the Complaint relates to (a) particular Complainee(s), the Appeal Handler shall inform the Complainee(s) in question of the Appeal and arrange meetings and or telephone calls between the Complainee(s) and the Senior Manager as required to discuss the Complaint. In such cases, the Complainee(s) should not, under any circumstances, contact the Customer directly regarding the Complaint. If the Customer contacts the Complainee(s) directly regarding the Complaint (which they are requested not to do in our Complaints Policy), the Complainee(s) should respectfully refuse to discuss the matter, referring the Customer to Section 5.4.3 of our Complaints Policy. Any such contact should be reported to the Appeal Handler.
- 7.5 If the Senior Manager requires additional information or evidence in support of the Complaint, the Appeal Handler shall contact the Customer using the Customer's preferred method of communication, stating clearly what information or evidence is required. Customers should be respectfully reminded that any delay in their response to such a request may delay the resolution of their Complaint, as per Section 5.4.4 of our Complaints Policy.
- 7.6 If a Customer is unable or unwilling to provide information or evidence requested under Section 8.5, the Senior Manager must nevertheless use all reasonable endeavours to resolve the Complaint. If, however, the Senior Manager considers that it is not possible to uphold the Complaint in the absence of the requested information or evidence, the Complaint may be closed and the Appeal Handler shall inform the Customer of the outcome in accordance with Section 8.10.
- 7.7 The Senior Manager shall examine and evaluate the Complaint, taking full account of all relevant statements, information, evidence

and circumstances and shall maintain full objectivity and fairness at all times.

- 7.8 During the investigation of the Complaint, the Senior Manager shall have access to all records, information, employees and subcontractors that may be necessary to enable them to carry out an impartial and thorough investigation.
- 7.9 Following their examination of the Complaint, the Senior Manager shall reach a decision, within the time period set out in Section 8.3 (subject to the exceptions noted therein). Resolution Actions that may be chosen that may be chosen are set out in Section 9. The decision of the Senior Manager shall be final, subject to the Customer's right to seek External Resolution of their complaint.
- 7.10 Once the Senior Manager has reached their decision under Section 8.9, the Appeal Handler shall send an Investigation Report and Decision Letter to the Customer by first class post or by email, as appropriate. Decision Letters shall set out the decision and the Resolution Action(s). The Customer shall also be reminded of their right to seek External Resolution of their Complaint.
- 7.11 If a delay either occurs or is considered likely to occur at any stage of the Level Three procedure, the Appeal Handler shall inform the Customer using the Customer's preferred communication method. The Customer should be informed of the length or likely length of the delay and the reasons therefor.
- 7.12 An electronic copy of the Investigation Report and decision should be uploaded to the Customer record on our CRM System.

## **8. Resolution Actions**

When handling Complaints, Level One and Two Complaint Handlers and the Senior Manager may select from the following Resolution Actions, as appropriate to the facts and circumstances of a Complaint:

- 8.1 Rectification of substandard work;
- 8.2 Replacement of faulty parts supplied and fitted by Happy Energy Solutions Ltd;
- 8.3 A formal apology
- 8.4 Compensation.

## **9. External Resolution**

- 9.1 Customers have the right to seek External Resolution of Complaints from an independent organisation if they are not satisfied with the outcome resulting from this Complaints Handling Procedure.
- 9.2 Stroma handles any and all such referrals in accordance with Happy Energy Solutions Ltd.'s Complaints Procedure. The appropriate representative(s) of Stroma may require contact with employees and or subcontractors of Happy Energy Solutions Ltd. and may require access to documents and information pertaining to a Complaint in the event that a Customer refers their Complaint for External Resolution. Any and all such interactions between Stroma and

Happy Energy Solutions Ltd. shall take place via (unless otherwise authorised by Senior Management):

Senior Operations Manager,  
Senior Compliance Manager,  
Company Director.

- 9.3 Any and all requests made by Stroma for evidence or information, whether written or oral, shall be answered without undue delay, subject to the approval and authorisation of a Senior Manager, who shall ensure that said request is reasonable and pertinent given the nature of the Complaint.

## 10. **Implementation of Resolution Actions**

Upon the conclusion of a Complaint, whether at Level One, Two or Three or by External Resolution the Resolution Action(s) settled upon shall require implementation in a timely manner. Responsibility for the implementation of Resolution Actions ultimately lies with the following and may be delegated thereby, as appropriate:

10.1 Senior Operations Manager, 01872 228240.

## 11. **Recording of Resolution Actions**

- 11.1 Upon the conclusion of a Complaint and the implementation of the applicable Resolution Action(s), Complaint Handler or Appeal Handler shall save electronic copies of the correspondence and resolution to the Customer record on our CRM System.

## 12. **Confidentiality and Data Protection**

- 12.1 All Complaints, Appeals, evidence and other information gathered, held and processed under this Complaints Handling Procedure shall be treated with the utmost confidence at all times. Such information may be shared with employees or subcontractors of Happy Energy Solutions Ltd. only to the extent required to resolve the Complaint in question in accordance with this Complaints Handling Procedure.
- 12.2 In the event that the details of a Complaint are to be used for training or quality improvement purposes, in which case they will be shared with other employees or subcontractors of Happy Energy Solutions Ltd. beyond the scope of this Complaints Handling Procedure, the relevant Customer's express permission must first be sought using that Customer's preferred contact method. Personal details (that is, anything that may be used to identify the Customer) shall be removed from all information so used. Such permission may be revoked at any time in accordance with the Customer's right to do so under Section 6.2 of our Customer Complaints Policy.
- 12.3 All personal information collected by Happy Energy Solutions Ltd. (including, but not limited to, Customers' names and contact details) shall only be collected, used and held in accordance with the provisions of the Data Protection Act 1998 and our Customers' rights under that Act, as detailed and embodied in our Data Protection Policy.

**This Policy has been approved and authorised by:**

**Name:** Adrian Wright

**Position:** CEO

**Date:** 31<sup>st</sup> October 2019

**Signature:** 