

Customer Services Procedure

Summarises the expectations Infomedia places on itself and its Merchants in handling consumer complaints

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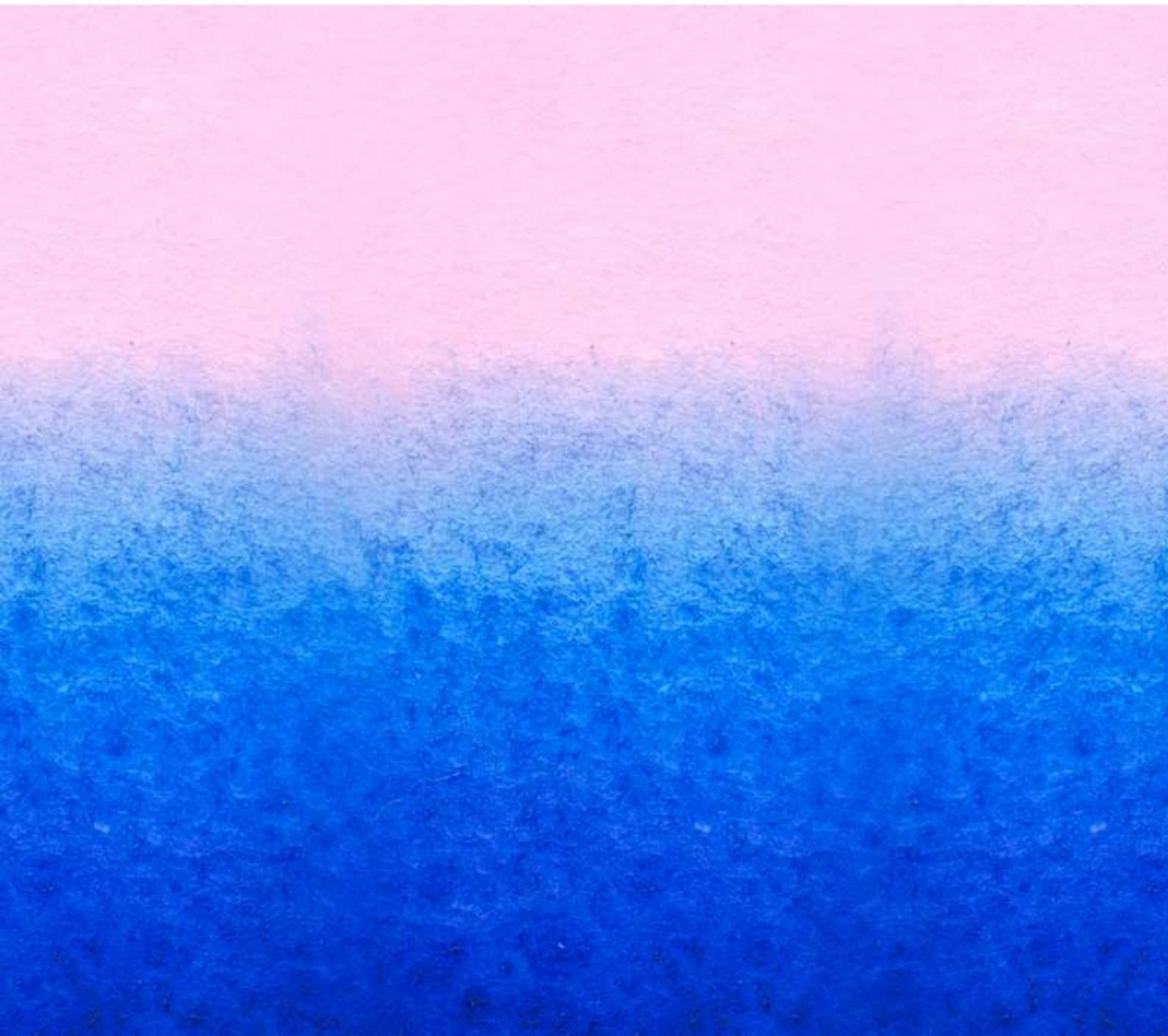


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Introduction

Infomedia is committed to the provision of high quality customer service and provides insights and guidance to all its partners. Infomedia recognises there are opportunities to continuously improve the way customers are engaged and the way compliments, comments and complaints are received, recorded and managed. In response to this, Infomedia has produced this Customer Service Framework.

Purpose of the Procedure

The purpose of this document is to set out the Infomedia Framework for Customer Services which is aimed at putting the customer at the heart of everything that we do, understanding our customers and raising the levels of customer satisfaction across our service delivery areas and channels.

This procedure should be used in conjunction with the Customer Services Framework and specifically sets out how merchants should manage customer services engagements. This is so that a high quality experience is provided at all time and resolutions to the satisfaction of the customer are arrived at as quickly as possible.

Individual mobile network operators may have specific additional rules and requirements which can be found in the Charge To Mobile (Compliance) Framework relevant to the territory in question, for example EE in the UK require all customers who have not interacted with a service for at least 120 days from purchase to be refunded upon request.

The document can be distributed to third parties that are used by the merchants for the handling of customer services engagements.

Complaints Procedure

A Complaint Procedure generally has four stages for a customer. Regular quarterly monitoring reports will be prepared for information to the Leadership Team who will determine any appropriate service improvement actions if this has not already been undertaken.

Each stage can handle the Complaint effectively. Reporting will be required from all sources a complaint can originate, Merchant, Carrier/MNO or Regulatory Body (PSA, OFCOM)

Stage 1- At the point of service (Merchant, Carrier/MNO, Regulator)

The relevant service will deal with the initial approach from the customer and will try to resolve the customer's concerns to the best of its ability and to the satisfaction of the customer.

Front line staff will pass any issues raised persistently to their line management.

There will be times when a Refund request is not justified and will be rejected. The important thing is that we respond properly, fairly and consistently when a complaint is made.

There will be times when a complaint is unfair. The important thing is that we respond properly, fairly and consistently when a complaint is made.

When a customer has been dealt with quickly and fairly, the customer feels they have been listened to and understood. Just as importantly, knowing how and why things have gone wrong is valuable information in helping us to improve our services, and make best use of our resources.

Remember - when a customer complains they are giving us another chance to get it right.

Stage 2 – Customer Service Manager / Operations Manager (Merchant, Carrier/MNO, Regulator)

Services should aim to settle complaints quickly and amicably. However, customers who are still not satisfied should be encouraged to write, email, use the telephone the Head of Service who is handling the matter to ask for it to be investigated further.

The complaint will then be investigated fully and objectively by the relevant Head of Service or an appropriate person nominated by them. The customer should receive an acknowledgement letter/email within five working days of receipt of their complaint, informing them of the *officer* dealing with the complaint and the timescale for replying to the complaint. A maximum of twenty working days is allowed to respond at this stage. If the complaint is likely to take longer than twenty working days to resolve the customer must be kept informed of timescales. The reply to the complainant must inform the customer of the availability of the third stage of the procedure and of how to refer the complaint again. This timescale may vary if additional information is required from the complainant. If this is the case the customer must be informed of the required information as soon as possible. Where appropriate a complainant will be kept informed of the progress on the issue he/she has raised.

The Complaint should also be notified at this stage to all parties within the value chain. (i.e a complaint handled by the Merchant will be notified to Infomedia who may, depending on the nature of the complaint, be required to notify the Carrier/MNO and the Regulator)

Stage 3 - by the Director of Customer Services / Director of Operations

If the customer remains dissatisfied with the responses at stages 1 and 2, they can ask that the complaint be considered by the Director of Customer Services / Director of Operations, will consider the complaint and gather any information they require in order that they can review the handling of the complaint. The customer should receive an acknowledgement letter within five working days and a full response within fifteen working days. Where there are unavoidable delays (ie staff holidays, sickness etc.) the customer must be informed of these and of the revised timetable. This timescale may vary if additional information is required from the complainant.

The customer will be made aware of the Ombudsman service should they not be satisfied with the outcome.

Stage 4 - Regulator

This is the final stage of the process when the customer can refer the matter to the Regulator. The customer has the right to do this at any stage of the process, but if they have not tried to resolve the matter through the Customer Care procedure, the Regulator is should point them in that direction first. If this happens and we don't follow our own procedures it could be found to be maladministration.

In all cases...

When a customer has made a written complaint to the Merchant, he or she must be informed of the outcome in writing.

A customer may telephone (rather than write) if they have learning difficulties but the complaint may require a detailed written response/investigation.

Handling Complaints

Nine golden rules to remember

- Treat all complaints seriously, don't take the complaint or criticism personally
- Make your first response positive. Don't rush onto the defensive
- Try to resolve the complaint as your first objective
- Avoid using jargon that the customer might not understand
- Be prepared to take responsibility for other people's mistakes - We are all Service Providers
- Take the initiative with suggestions to put things right and offer choices
- Try to make amends - but don't make promises we can't keep
- If the customer is wrong, don't embarrass them if you need to point it out
- Learn from mistakes

Complaints Involving More than one Department or Partner

In cases involving more than one Department or Partner, the receiver of the first call should take responsibility for co-ordinating the response to the customer, and ensure that the procedure and time scale are fulfilled.

Where there is uncertainty for a particular complaint the matter must be referred to the Stage 2 nominated Head of Service.

Monitoring Customer Feedback, Complaints and Compliments

All verbal, electronic or written complaints, and their outcomes, must be recorded. Records should enable the following information to be produced:

- number and nature of complaints relating to each service
- number of complaints dealt with at stages one, two, three and four
- performance in meeting the timescale set out for each stage of the procedure
- outcome of complaints at each stage, ie upheld, unresolved
- any long-term action undertaken as a result of complaints eg changed procedure

This information will be reported on a quarterly basis to all Partners

Special Cases

Complaints relating to individual Customer Service Manager / Operations Manager will be referred directly to the Director of Customer Services / Director of Operations and investigated in accordance with the timescales set out in Stage 3 of our procedure.

Some complaints may invoke internal disciplinary procedures. So far as is possible, such action should not frustrate the resolution of the customer's complaint. Where delay is unavoidable, the customer must be informed of the position.

Remedies

If a complaint has been found to be justified, the objective should then be, as far as possible, to put the customer in the position he or she would have been in had things not gone wrong. Depending on circumstances, this will usually be achieved by:

- apologising to the customer and explaining what went wrong
- providing the service, the customer required
- changing procedures so that the cause of the complaint is not repeated

There may be circumstances where the complainant feels justified in seeking financial compensation (refund) from the Service Provider. All such cases should be referred to the Refund Policy. The customer must be kept informed of progress.

Unacceptable Actions by Complainants

A small minority of customers make complaints that are vexatious or unreasonably persistent. Examples include;

Being abusive to staff

Refusing to accept the decision - repeatedly arguing the point and complaining about the decision.

In such cases it is permissible to refuse to accept further communication from the customer except in writing and clear notes should be made about the decision to refuse further contact from the customer to inform any future escalation and investigations. Other members of the value chain should be informed of the complaint and that it has been determined to feature unacceptable action by the complainant.

Customer Engagement and Consultation

Regular consultation and engagement with customers will capture their views on the services they receive and the way they are treated. Services should not be based on assumptions of what we think the customer wants.

Customer research can take on many forms. At its simplest level, it implies service deliverers “keeping an ear to the ground” and acting on suggestions and comments received. Customer feedback through such mechanisms as Customers Satisfaction (CSAT) and Net Promoter Score (NPS) for example, are relatively inexpensive to implement. These would give insights to the Customer Experience (Typically CSAT is scored 1-9 and rates the experience of the Customer Call/Interaction) and the Quality of the Service (NPS rates 0-10 and is “how likely would you be to recommend the brand to a friend”).

Customer Service and Contact Centre scripts should be provided for review and held by Infomedia as part of the Service Setup.

A review of customer calls should be performed monthly as part of the Operational Governance Monthly Review a minimum of 10 calls should be reviewed with criteria for review being agreed between Infomedia and the Merchant in the agenda setting phase.

Refund Guidance

Where a customer requests a refund the following must be considered.

1. Did the customer subscribe to the service, this can be confirmed using the Consent to Charge function or by using the Escalation Report Function within CS Lite – refer to the **CS Lite User Guide**

If there is no Consent to Charge data present a full refund should be offered¹.

2. Has the customer interacted with the service?
 - a. A service interaction shall be a single user session on the service. We recommend that a session should expire after 15-20 minutes inactivity (for any reason), and therefore any return to the service after such a gap of inactivity shall count as a new session.
 - b. Where it is not possible to measure sessions, measure each individual user login or subscription validation to the service shall suffice, with the same inactivity period/gap between re-validations.

A service interaction is a newly subscribed user who uses the service at least twice in the first week and again one additional time in the first month (between day 8 and day 31 from subscription date).

An automatic redirection to the service page will no longer be counted as a service interaction.

If there have been no Interactions it is strongly recommended that a full refund should be offered.

Refund Payments:

Refunds should be where possible provided through a Refund API direct to the Customers bill.

Alternatively, the following methods are acceptable for Refunds.

- Paypal
- Post Office
- Cheques

Best Practice:

Where the Refund has not been claimed within 3 working days a further contact with the customer should be performed. An understanding of why the refund has not been claimed should be sought and if necessary an alternate method offered.

¹ For services purchased after January 2017, prior to this best data and judgment must be applied on a case by case basis

Where the Refund has not been claimed for a further 5 working days a further contact with the customer should be performed. At this stage, you must notify Infomedia of this via csukrefunds@infomedia.co.uk

Bulk Refund Process:

Circumstances may arise whereby it is necessary to conduct a bulk refund of customer transactions. This may be necessary as a result of, for example, a technical incident resulting in customer overcharging, or a carrier or regulator instruction.

This part sets out the high-level steps and processes that will typically be taken when a bulk refund is necessary. This is with the caveat that bulk refunds are by their very nature the result of exceptional circumstances and in each case, will form part of a distinctly recorded and worked Incident, Project or Change Request.

Approach:

Issuing bulk refunds is a rare event at Infomedia and therefore technical resource will be assigned to the task on a case by case basis however all scripts and processes designed in a given incident shall be recorded and stored for future events.

A bulk refund request will be run by the Operations team as an Incident under either a Technical or Compliance lead, depending on the cause.

With Carrier Refund API:

Typically, each carrier refund API will have distinct configuration sitting behind Infomedia's user-facing CS UI which does not, by design, enable bulk refunds. A Change Request (see [Document]) shall be submitted for a custom script to be developed and run, with the consent of the carrier, to process the bulk refund. The CR shall also include, either as part of the same Request or as a companion CR, a request for an ad hoc bulk message campaign – see 'Customer Communications' below.

Without Carrier Refund API:

Where Infomedia does not have a carrier refund API available for a bulk refund, refunds shall be processed by either the merchant(s) involved in the causative incident or the carrier depending on who has the ability to contact customers directly.

As this varies significantly between different carriers these matters shall be dealt with on a case by case basis, following the principle of ensuring the most effective and prompt delivery of funds.

Customer Communications:

All customer communications relating to a bulk refund shall be designed and approved jointly between the Operations Director and Compliance Manager.

The guiding principles shall be as follows:

- Inform
- Explain
- Reassure
- Support

The effected customers shall be informed that a refund shall take place, so that the appearance of a credit on their bill is not unexpected and does not drive excess customer support queries. The cause of the refund shall be explained clearly and concisely but with due regard to avoiding trigger words that may again drive customer support queries. Communications shall also explain what actions have been taken to avoid recurrence to reassure the customer that they will not be exposed to the same situation again. Finally, communications shall include clear details of the most appropriate route to support services for any queries to prevent incorrectly directed queries to, for example, a carrier rather than a merchant.

An example of such a communication, via SMS, is:

From: GAMEHUB

Hello, we've fixed a technical error with your service & automatically refunded a £2.50 overcharge for which we apologise. Need more help? Call 01234567890

Treating People Fairly and with Respect

We all need to work together to positively reinforce the benefit from having diverse communities that helps not only enhance the services that we deliver but also our reputation. This is why equalities and diversity is a critical part of this Framework. We understand delivering services to our communities that are based upon local need is crucial. So, it is important that we not only raise the awareness of diversity in our communities but also promote equality in the delivery of all our services. We need to make sure that we collect information and data about our communities to help us to do this. Using this information will enable us to deliver more efficient services. We will use our Single Equality Scheme to monitor our progress in this area.

Contact Details

If you would like to know more about the information in this document please contact:

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