Monitoring and Reporting
Main Objectives of the GD CoP

Requirements set out in the GD CoP are designed to ensure that all Participants:

- operate fairly and transparently
- deliver good customer service
- have appropriate levels of training
- provide appropriate redress mechanisms for consumers.
## Monitoring Matrix

<table>
<thead>
<tr>
<th>Document</th>
<th>UKAS</th>
<th>CB</th>
<th>GDP</th>
<th>GDORB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Code of Practice</td>
<td></td>
<td>✓ Monitor Assessors Installers</td>
<td>✓ Verify Assessors Installers</td>
<td>✓ Monitor CBs Providers</td>
</tr>
<tr>
<td>PAS 2031</td>
<td>✓ Monitor Installer CBs</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>PAS 2030</td>
<td></td>
<td>✓ Monitor Installers</td>
<td>✓ Verify Installers</td>
<td></td>
</tr>
<tr>
<td>CB Assessor Standards</td>
<td>✓ Monitor Assessor CBs</td>
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<td></td>
<td></td>
</tr>
<tr>
<td>Assessor Standards</td>
<td></td>
<td>✓ Monitor Assessors</td>
<td>✓ Verify Assessors</td>
<td></td>
</tr>
<tr>
<td>GD Mark Licence</td>
<td>✓ Verify Installers Assessors</td>
<td>✓ Verify Installers Assessors</td>
<td>✓ Monitor CBs Providers Non-Accredited</td>
<td></td>
</tr>
</tbody>
</table>
GD ORB’s role in monitoring Providers
GD ORB will monitor:

• **Providers**
  • Compliance to the Code of Practice;
  • Relevant requirements under the Framework Regulations;
  • Quality Mark Licence

• **Non-accredited parties**
  • Use of Quality Mark/ ‘near’ Quality Mark

• **Certification Bodies***
  • Code of Practice;
  • Quality Mark Licence

*ORB will **NOT** duplicate the role of UKAS or CBs
GD ORB’s approach to monitoring
GD ORB’s Approach

- Positive and constructive
- Preventive, not reactive
- Problem-solving and solution oriented
- Co-operative and handholding
- Learning through the process
Compliance Checks

When:  
- 1 in first year of Green Deal operation, thereafter at least 1 every 2 years

Where:  
- Off-site with option for follow-up visit

What:  
- QM use, marketing and promotion materials on GD, DPA compliance, procedures and results of monitoring employees’ CoP compliance, complaints analysis reports, sample of records (e.g. training on CoP, complaints handling)

Sample:  
- All authorised Green Deal Providers active in the market
Analysis of Complaints

**When:**  
- Monthly

**Where:**  
- ORB will monitor internally

**What:**  
- ORB will receive Providers’ complaint reports directly
  - High levels of unresolved complaints (vs. Market trends and proportional to number of Providers)

**Trigger:**
Other Market Intelligence/Feedback

**When:**
- As and when feedback is received

**What:**
- ORB will receive feedback about Providers’ directly from other market participants e.g. CBs, UKAS, Ombudsman

**Trigger:**
- Proportionally high levels or issues raised that result in potential high levels of market detriment
The ORB logs all issues

- If potential serious breach of CoP requires investigation/explanation immediately

- If non serious- GD ORB builds a picture of complaints and analyse status each month to inform of triggers

- Those participants triggering will be seen more regularly and will be subject to SoS sanctions
A Monitoring Governance Steering Group will be established to advise GDORB on:

- Consistency and timeliness of monitoring strategy implementation
- Making recommendations to DECC SoS for changes to the Framework Regulations/CoP
- Revisions to the GD Monitoring Strategy going forward in light of market developments.
Complaints Process
Contents

• Defining a Complaint

• Complaints Processes for the Green Deal

• Complaints Reporting
Defining the Green Deal Complaints
A Complaint is....

‘Any expression of dissatisfaction, whether oral or written, and whether justified or not, from or on behalf of an eligible complainant about the provision of, or failure to provide a service’.

(Ombudsman Investigation Service)
Defining a Green Deal Complaint

Eligible complainant:

- Improver, bill payer, homeowner (as outlined in Framework Regs and CoP);
- Any Green Deal participant, certification body, service provider or potential customer.

Types of Complaints:

- Complaints about the service provided (all participants and service providers);
- Complaints about the Supply Chain (e.g. Providers);
- Escalated complaints (e.g. CBs, UKAS, Ombudsman, ORB);
- Also extends to matters in connection with any energy plans which are not green deal plans.
Complaints vs. Potential Breaches

• Breaches of Code of Practice/ Legislation
• Breaches of the relevant standards
• Misuse of the Quality Mark

• By Installers → report to Certification Body
• By Assessors → report to Certification Body
• By Providers → report to ORB
• By Certification Bodies → report to ORB/UKAS
Complaints Processes
Complaints handling - key stakeholders

1. Providers
   - Service Provided
   - Complaints about the Supply Chain

2. CBs, UKAS, ORB, OIS
   - Service Provided
   - Escalated Complaints
   - Quality Mark (CBs and ORB)

3. EST and EST Scotland
   - Service provided

4. FOS, Citizens Advice, Trading Standards, OFT
   - Escalated complaints
Complaints-GD Plan in place

- **Provider must:**
  - Acknowledge the complaint within 7 working days;
  - Provide their complaints handling procedure (or any other relevant complaints procedure);
  - Provide the details of the Ombudsman Service;
  - Use reasonable endeavours to investigate and resolve the complaint;
  - Notify of the decision within eight weeks;
  - In the event of a breach of the relevant requirements by an installer/assessor, notify the Certification Body;
  - Where complaint is a about Assessor before the plan in entered into, refer to Assessor organisation and provide details of the relevant Certification Body.
Escalation to Ombudsman

- Customer
  - Complaint
    - GD Provider
      - Complaint Resolved
        - Ombudsman
          - Complaint Resolved
            - Secretary of State
              - Considers evidence and makes decision
                - Sanctions
Disclosure and Acknowledgement

Customer → GD Provider

- Confirms that a disclosure and acknowledgement breach may have taken place, or dispute the complaint. Complaint referred to the OIS

GD Provider → Ombudsman

- Makes enquiries to confirm the dispute and then investigates the complaint

Ombudsman → SoS

- Reports investigation to the SoS via the GD ORB

SoS → Secretary of State

- Considers evidence and makes decision

Secretary of State → Sanctions
Customer Complaints - No Green Deal Plan in place

1. Customer contacts ESAS/HES to complain and does not have a GD finance plan
   - About Provider? Yes → Complain to Provider
     - Resolved to customer’s satisfaction? Yes → End
     - No → Report a complaint to CITACS → End
   - No → Complaint about Assessment or Assessor? Yes → Complain to Assessor
     - Resolved to customer’s satisfaction? Yes → End
     - No → Escalate to certification body
       - Resolved to customer’s satisfaction? Yes → End
       - No → Report a complaint to CITACS
   - No → About installer or installation? Yes → Complain to Installer
     - Resolved to customer’s satisfaction? Yes → End
     - No → Report a complaint to CITACS
   - No → About Certification Body? Yes → Complain to Certification Body
     - Resolved to customer’s satisfaction? Yes → End
     - No → Report a complaint to CITACS
   - No → Misuse of the Quality Mark? Yes → Capture details on CRM
     - Refer to GD ORB in weekly complaints report
       - If customer wants to report misuse directly they can email: gdhelpdesk@gemserv.com
       - Report a complaint to CITACS
   - No → CitACS no: 08454 04 05 06
Complaints Reporting
GD ORB Reporting Scope

Includes complaints that:

• Are within the scope of the organisation’s operations;

• Are submitted as a complaint according to the organisation’s complaint procedures; and

• Falls within the scope of the organisation’s Green Deal complaints handling obligations (as defined in the CoP, relevant standards or service contracts).

All other complaints should be referred to the relevant organisation/body and are not reported to ORB.
## Complaints Reporting - Green Deal Participants

<table>
<thead>
<tr>
<th>Organisation</th>
<th>Type of complaint</th>
<th>Complaints</th>
<th>Breaches</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Service provided</td>
<td>Supply chain</td>
</tr>
<tr>
<td>Providers</td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Certification Bodies</td>
<td></td>
<td>✓</td>
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<td>UKAS</td>
<td></td>
<td>✓</td>
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<td>EST Scotland</td>
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<td>✓</td>
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<tr>
<td>Ombudsman</td>
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<td>✓</td>
</tr>
<tr>
<td>ORB</td>
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<td>✓</td>
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</tr>
<tr>
<td>Financial Ombudsman</td>
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<td></td>
</tr>
<tr>
<td>Citizens Advice / OFT</td>
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<td>✓</td>
<td></td>
</tr>
<tr>
<td>Trading Standards</td>
<td></td>
<td>✓</td>
<td>✓</td>
</tr>
</tbody>
</table>

- Report to ORB
- Report to ORB if there is a (escalated) complaint lodged
Complaints reporting (example)

<table>
<thead>
<tr>
<th>Report from</th>
<th>Date</th>
<th>Reason Code</th>
<th>Measure Code</th>
<th>Received From</th>
<th>About</th>
<th>Country</th>
<th>Postcode</th>
<th>Status Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Provider</td>
<td>20120201</td>
<td>IN</td>
<td>120</td>
<td>CUS</td>
<td>INS</td>
<td>England</td>
<td>SW</td>
<td>Unresolved</td>
</tr>
<tr>
<td>ESAS</td>
<td>20120201</td>
<td>AL</td>
<td>100</td>
<td>CUS</td>
<td>ESA</td>
<td>England</td>
<td>RH</td>
<td>Resolved</td>
</tr>
</tbody>
</table>

- A complaint received by a provider from a customer about an installation (hot water systems) carried out by a contracted installer;
- A complaint received by ESAS from a customer about the advice service provided by an ESAS energy advisor;

- Submitted to ORB monthly
- Cumulative data required as status code (resolved/unresolved) should be updated
Ombudsman Services: An Introduction
Key Attributes

- Each complaint on its own merits (no precedents)
- Eight weeks to resolve
- Free of charge (for the customer)
- We listen to both sides and look at the facts
- If the ombudsman makes an award and the complainant accepts it, it is legally binding on the company that has been complained about
The Enquiry Process

Signpost

Initial Contact

Send out filled in complaint form

Receive signed complaint form & supporting documents

Case opened
Investigation Process

Valid Complaint

Investigation Required

findings presented

final findings

Customer Agrees

Both Agree

 Closure

Not Binding

 Customer Disagrees

Remedy Implementation

Request for Review by either party

MAS *

* Mutually Acceptable Settlement
Reviews

Must be able to:

• Show that there was a significant error in the facts which makes a material difference, or

• Produce significant new evidence which may make a material difference, along with an explanation of why that information was not previously made available.
Ombudsman Services have regard to:

- Current regulation and law
- Codes of Practice
- Good industry practice
- Natural justice
- The balance of probabilities
Remedies:

- The ombudsman can require:
  - A service or some practical action to be provided
  - An apology or explanation
  - A financial award (£25,000 maximum remedy)

- OIS may **recommend** changes in policies and procedures
- Enforceable via the courts
- Important for reputation of Ombudsman Services, participating companies and the industry
Visit OIS at:

www.ombudsman-services.org.uk
Secretary of State Sanctions
Sanctions that can be imposed by SoS

- The SoS may impose one or more of the following sanctions:
  I. **cancellation** or **reduction** of a Green Deal Plan on a Green Deal Provider or payee;
  II. **compensation** further to cancellation on an improver or a notifier, as applicable;
  III. **suspension** of authorisation on an authorised person other than a Green Deal Provider;
  IV. **compliance notice** on a Green Deal Provider;
  V. **financial** penalty on a Green Deal Provider;
  VI. **withdrawal of authorisation** on an authorised person.

- The SoS to consider if the bill payer has suffered a substantial loss;

- The SoS may accept an enforcement undertaking in place of sanctions III, IV, V and VI as listed above.
Provider Reporting
Contents

– Provider Reporting Obligations

– GD ORB Obligations

– Reports
  • P1 - Installers and Measures installed
  • P2 - Green Deal Plan Report
  • P3 - Complaints Report
  • P4 - Assessment Report
  • (8 Week Procedures)

– GD ORB Approach to Collecting Data and Timeframes
Provider Reporting Obligations
Framework Regulations

Regulation 24

• Reporting requirements to be completed by the 7th day of the month.

• Schedule 2; Section 1 – Monthly Reports
  – Number of Green Deal Plans
  – Number of Green Deal Plans cancelled
  – Value of plans sold
  – Number of plans written off
  – Unresolved and resolved Customer Complaints
  – Unresolved Complaints for 8 weeks or more and steps taken to resolve it
  – Assessments carried out by independent Assessors
  – Number and type of installation
  – Comparable detail on Energy Plans
Framework Regulations

Regulation 24

- Schedule 2; Section 1 – Annual Reports

- Action taken following customer complaints, breach of Regulations and breach of the Green Deal Code of Practice requirements
- Details of partnership arrangements between the Provider and other organisations
- Overview of Green Deal Operations including geographical coverage, number of Energy and Green Deal plans
- Details of any decisions taken during the reporting period regarding how the Provider intends to market and sell Energy plans and Green Deal plans in the next reporting period.

Qualitative data to be collated by the GD ORB using an online survey from March 2014
GD ORB’s Obligations

To act on behalf of the SoS

• **Monthly and Annual Market Reporting**
  – To feed into DECC figures demonstrate market activity

• **Monthly Compliance Reporting**
  – Understanding Triggers and Trends which feed into the monitoring strategy

• **Protection of Data**
  – ISO27001 and IL2
  – Only share trends rather than individual figures
Provider Reports
Report P1- Installers and Measures Information

What we require;

A CSV File, with an exact file name and the following data items;

- Year
- Month
- Installer ID
- Measure 1 – 10
- Domestic/Non Domestic
- Country
- Postcode (First 2 Digits)
Report P2- Green Deal Plan Information

What we require;

A CSV File, with an exact file name and the following data items;

- Month
- Year
- Number of plans entered into
- Number of plans cancelled
- Amount sold
- Amount repaid
- Amount written off
- Country
- Postcode (First 2 Digits)
Report P3- Complaints Information

What we require;

A CSV File, with an exact file name and the following data items;

- Date
- Reason Code
- Measure Code
- Received From
- Received About
- Country
- Postcode (first 2 digits)
- Status Code
Report P4 - Assessment and Assessors Information

What we require;

A CSV File, with an exact file name and the following data items;

• Month
• Year
• Number of Assessments
• Number of Independent Assessments
8 Week Procedures

What we require:

• Providers to maintain records of steps taken on all complaints that reach 8 weeks

• The ORB will require visibility of these records on an ad hoc basis and build in checks in the monitoring strategy
ORB Approach to collecting the data & Timeframes
Report P4- Approach and Timeframes

- Submitted to us on the 7th of each month

- GD ORB will work with you in the first month to support you compiling the data and have provided you with detailed instructions

- In the first few months you will send data directly to us by e-mail. Following that you will upload reports directly onto our reporting tool
The Green Deal Provider
Post-Authorisation Support Service Team

providersupport@gemserv.com
Tel: +44 (0)20 7090 7760

Thank you