

Our commitment to good business
Demonstrating integrity
in corporate conduct

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centrica

Version 1 July 2014



Group UK Good Repute Policy

Our Business Principles

- 1 Demonstrating integrity in corporate conduct
- 2 Ensuring openness and transparency
- 3 Respecting human rights
- 4 Enhancing customer experiences and business partnerships
- 5 Valuing our people
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Our commitment to good business

Business Principles and Group Policies

Our purpose is helping people today and securing energy for tomorrow. Our Business Principles and Group Policies are the foundation for how we operate to achieve this purpose. More than a tick box for compliance, how we conduct business defines us in the eyes of our people, our customers and our wider stakeholders. We are committed to ethical and responsible practice, as one business, with one set of Business Principles and Group Policies. Together, our eight Business Principles, which set out the operating standards we expect, and our Group Policies, which support these Business Principles, are our commitment to good business. The standards our people expect of themselves and one another are very high, and reflect the nature of our business, and our place within it. Our Business Principles and Group Policies are here to help us make the right decisions and provide guidance when needed.

Your commitment

- We remain a principled business as a direct result of every single employee conducting themselves with integrity.
- Every decision you make impacts those around you. You also need to know that you can rely on responsible and ethical decisions made by others.
- You, along with everyone else involved in Centrica's business and operations, have a personal responsibility to adhere to these principles and policies and to conduct business legally, responsibly and ethically.
- You must be confident about those decisions. Adhering to these principles and policies will give you that confidence.

Your commitment regarding this policy

- This policy is directed only at members of Human Resources (HR), recruitment teams and line managers as you have the power to protect, enhance or damage Centrica's reputation. You have a responsibility to uphold our Business Principle of "Demonstrating integrity in corporate conduct" when applying this policy.





Introduction



Effective good reputation controls safeguard our business, our customers and reputation by:

- preventing and detecting financial crime
- providing consumer confidence in our business
- minimising our exposure to risk of fraud, misuse of customer data and unauthorised systems activity
- enabling us to fulfil our regulatory obligations.

Your commitment includes satisfying yourself of the suitability of anyone – covering their honesty, integrity and competence – who is employed by us or acts on our behalf. You must consider these at all stages from staff recruitment to appointment and throughout length of service. It is not your responsibility to carry out background checks, but it is your duty to engage the services of the Centrica Recruitment Team (CRT) and request a check by them. The CRT and its specialist teams will provide you with advice and support where needed.

We follow a risk-based approach to ensure all individuals are assessed for good reputation to the right level for the role they are expected to perform. This includes conducting criminal record checks on all new starters.

Other checks include asylum and immigration, past and present conduct records, employment history and financial checks.

Professional membership and education checks may also be conducted when the role requires it.

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Introduction

Scope

This policy is aimed specifically at HR, recruitment staff and line managers.

Line managers are responsible for ensuring the policy is applied in their own areas.

Purpose

The policy explains your responsibilities for ensuring good reputé during the course of your HR and recruitment activities and for upholding our Business Principles.

Policy

You should apply this policy to all Centrica employees (permanent or temporary), franchises, agency staff, outsourced arrangements, contractors, consultants and agents.



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Responsibilities



Organisations that are contracted by Centrica to perform services on our behalf (i.e. outsourced, contracted, franchises or appointed representatives) usually employ their own workforces and have different mechanisms regarding good repute.

However, as they come under the scope of this policy, you must be satisfied that they are following its procedures. This also applies to recruitment agencies and service providers that undertake pre-employment checks for us.

See page 10 for more information.

You are also responsible for ensuring the good repute of individuals who are appointed by Centrica on a non-employment basis, both at recruitment and through length of service.

All hiring managers must follow the prescribed recruitment process managed by the CRT, which will include support with pre-employment checking. See Centrica Resourcing on the intranet.

- If any person's good repute has not been validated (e.g. potential employees attending assessment or interview, training providers, building tradespeople, short-term consultants), you must treat them as visitors to sites and not allow them unaccompanied access
- Make sure you follow Group and local security and access policies.



Responsibilities

Appointing Approved Persons

A limited number of individuals within, or appointed by Centrica are directly authorised by the Financial Conduct Authority to hold Approved Persons roles.

Our procedures must be followed. They are designed to meet our statutory responsibility of ensuring only fit and proper persons are engaged in controlled functions within the financial services industry.

The CEO of British Gas Insurance and the Chairman of British Gas Services are responsible for assessing each individual to ensure they are fit, proper and competent to perform their role before being appointed and on a continual basis. HR, Compliance and the British Gas Insurance Nominations Committee provide support.

Centrica Energy has its own process for appointing Approved Persons. Consult the HR team in Centrica Energy for further information.

See the Approved Persons Fitness and Propriety Competence and Training Procedures for information on the statement of principles, code of practice, fit and proper person checks via the British Gas Central Compliance Team.

Appointing Information Super Users

A limited number of Information Super Users within or appointed by Centrica have increased access levels to our IS architecture. They can access high volumes of customer and employee data, affect system security or access the system without leaving a footprint trace.

Centrica's nominated IS Director appoints and approves such users directly, and should be contacted if you have any queries about the Information Super User approvals process.

Recruiting new employees

New employees are obliged to disclose all information needed for us to make an informed decision on their good reputation. The CRT is responsible for validating the information by organising pre-employment checks.

See the Centrica Group UK Resourcing Policy from the Centrica Resourcing team on the intranet.

To fill any vacancies, always contact the CRT first by emailing recruitment@centrica.com or calling 0800 980 9893 (externally) or 748 545 (internally).



Responsibilities



International requirements

To avoid exposing Centrica to risk of data loss, fraud, theft or reputation, you must establish a person's good reputation in all circumstances, regardless of their operational location, by asking the CRT to do the background checking for you.

Any non-UK-based business or individual that is employed or works on behalf of any Centrica UK business must meet the requirements of this policy. UK-based new hires that have spent more than 18 months outside the UK in the previous five years will, where possible, be subject to a criminal record check in the other country as well as the UK.

It may be a lengthy process or not possible to conduct pre-employment checks to UK standards in some countries, so it is advisable to seek guidance and support as early in the recruitment process as you can.

If there are problems establishing checks, the relevant business area is responsible for determining what levels of increased controls are required and how they should be applied to safeguard Centrica.

Line managers are often able to conduct recruitment only infrequently but by working with the CRT on all recruitment activities you'll be able to meet this policy's requirements.



Responsibilities

Pre-Employment Checking

Every offer of employment must be made subject to the satisfactory completion of Pre-Employment Checks (PEC), which happen once a verbal offer is accepted. Minimum checks on all Centrica hires (apart from those under 18 years, where there's little value in carrying out some checks) will cover:

- asylum and immigration
- financial
- three-year work history
- basic level criminal record.

See [Appendix 1](#) for other PEC requirements.

Under-18s entering directly from full-time education shall not require a work history check, unless it's a specific requirement of the role. In such cases you will seek a reference from their school or college. A financial check will never be required. For those offered at the age of 15 to start once 16, the criminal record check shall be conducted after the person's 16th birthday.

If you're the recruiting manager, you should visually check specific trade or other qualifications for the role before the offer, e.g. plumbers, heating engineers or electricians.

Compare the results from the PEC process against the approved RAG (red, amber, green) criteria to assess the applicant's good repute.

See [Appendix 2](#) for a review of actions to be taken and the full criteria.

You should always:

- inform every individual that an offer of employment is subject to a satisfactory PEC outcome
- allow sufficient time to complete the checks before anyone starts employment with us
- avoid urgent recruitment without the PEC process being complete wherever possible.

Line managers should ensure reasonable measures are taken to manage risk around our customers' and employees' data or security while awaiting the results.



Responsibilities

Employees dealing with customers directly or entering Centrica assets

No employee is allowed to enter a customer's premises (any part of the building or boundaries, including gardens, alleys etc.) or access a Centrica asset unsupervised until you have established their good repute, specifically the result of their criminal record check.

This applies equally to employees who interact with customers in person such as during sales and lead generation.

Access to an asset is defined as any individual whose site privileges give them access to infrastructure involved in exploration, generation, production, treatment, storage or distribution of energy, such as power stations, production or exploration platforms, storage facilities, port or terminal facilities and windfarms.

The hiring manager is responsible for deciding how this definition applies to the site they are hiring for. You must consider the possibility of the individual accessing other sites that fall within the definition too.

Dealing with adverse PEC checks

Recruiters should review the offer of employment when a candidate doesn't meet the standards expected and investigate to establish the full facts.

If you believe the criteria is preventing the individual being hired but they don't pose a risk to customers, business or brand, ask the line manager and local HR to consider the case. They will decide whether the offer proceeds or is withdrawn.

Escalation to a Level 4 manager is required for anyone who falls within the red band of the RAG criteria.

You should record any decision to proceed with the offer, including the reasons why, on the decision record form ([Appendix 4](#)) and store it within the employee's recruitment records.

See the Centrica Group UK Resourcing Policy from the Centrica Resourcing team on the intranet.



Responsibilities



Non-permanent workers

This policy covers non-permanent workers such as those engaged via agencies or outsourced agents. It also covers independent contractors and consultants. Who shall carry out the PEC is stipulated in our preferred supplier contracts.

PEC requirements for all these individuals shall be in accordance with the guidance given on page 10 of this policy. The provider (e.g. the agency) must retain evidence that the checks have been completed and this should be made available for audit by Centrica or by a third party it nominates. In the event that the provider becomes aware as part of these checks that an individual has previously been in an employment relationship with Centrica, they should advise their Centrica contact to allow an internal reference to be carried out.

Checks do not need to be repeated if the provider has recently confirmed the good repute of an employed individual to perform other roles on its behalf before being appointed to a Centrica contract, provided that:

- the individual had their good repute established to the standards required for the role within Centrica
- the agency vouches for their good repute since the checks were last undertaken
- there is no evidence of past performance or behaviour that would give rise to concern
- the checks were conducted in the last three months and there has been no break in service or relationship between the provider and the individual since they were completed.

If agency staff, contractors or consultants become permanent Centrica employees, the PEC will be redone before appointment just like new employees recruited from outside the business.

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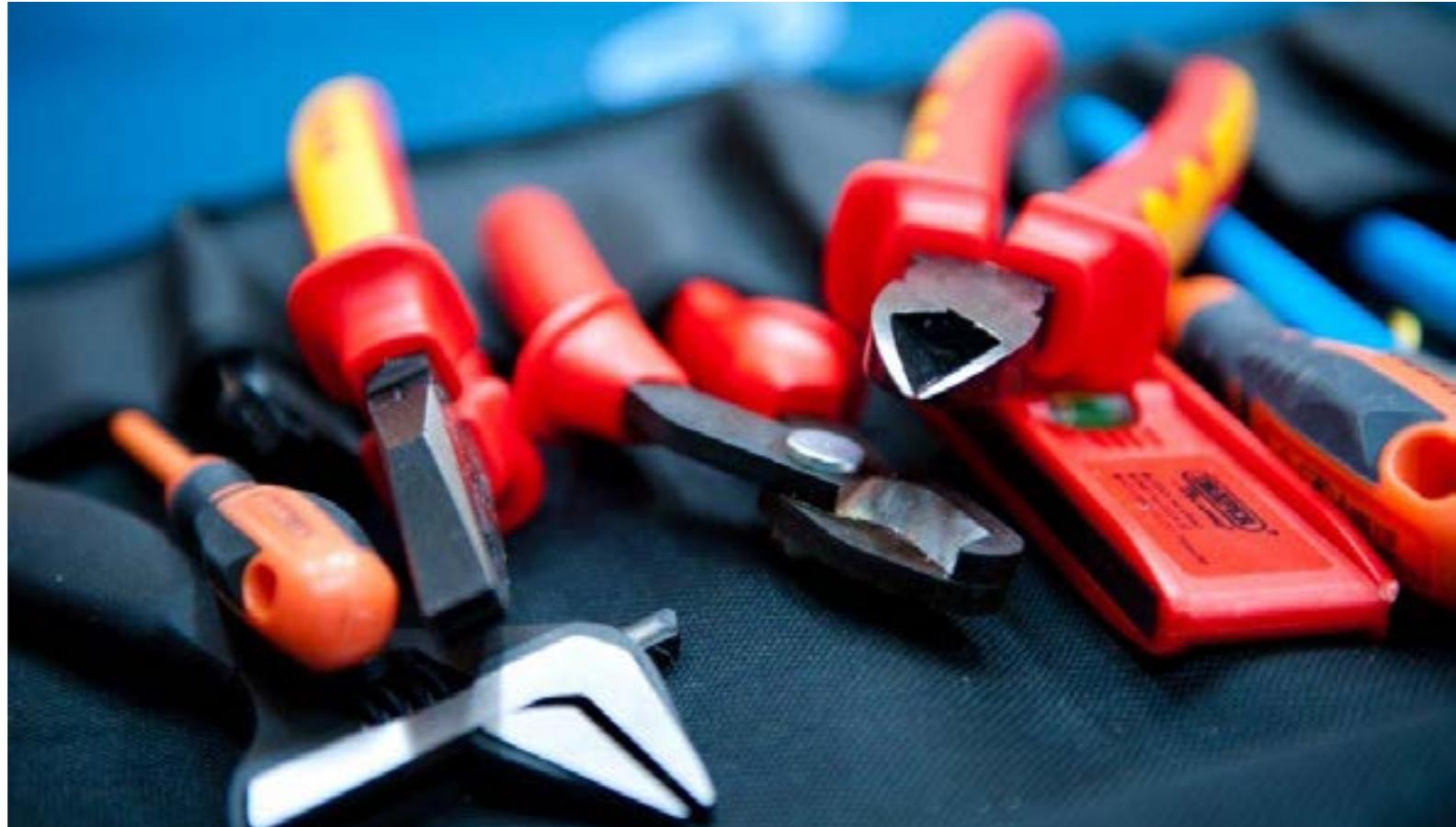
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Responsibilities

TUPE transfers

There is no need to run PECs again if the organisation can prove checks were made before hire. But if no checks were done, conduct the PEC as part of the TUPE transfer process.

Consider that the original checks may have been less than those required for the position the individual is undertaking under the transfer agreement. If so, conduct enhanced PECs – see [Appendix 1](#).



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Arrangements for existing employees

Good reputation is as important during employment as it is when joining the company.

We do not repeat the checks that were made when people entered the business, as we feel they don't add value in our commitment to ensuring our people's good reputation.

However, the exception is where Centrica agrees to additional checks as part of a tendering process or there exists some specific regulatory requirement for the role and then they'll be conducted as required. Email the Centrica Resourcing Team for more information: recruitment@centrica.com

Line managers are expected to play a key role in monitoring the performance and behaviours of their people, as well as following this policy and the relevant Codes of Conduct for their business area.

Primary controls

Our primary controls ensure our processes are robust at preventing and detecting fraud, misuse of customer data and unauthorised systems access and activity.

Central to this approach is Information Security. See the Centrica and British Gas Information Security and Policies and Standards.

Each business area is responsible for ensuring primary controls are used. You must monitor them to ensure they are effective, with regular information security checks taking place at a frequency that suits your area.

Any suspected breach of primary controls will be dealt with under the Code of Conduct and Disciplinary policies and procedures. If any elements potentially involve financial crime, they will be reported to the relevant Fraud Prevention team for that business area.

Group Fraud and the Risk, Audit and Compliance Committee (RACC) will review all reportable outcomes centrally.

Management information should also be used with primary controls to ensure lack of good reputation is detected and prevented in future. Each business area will monitor this differently. Business units are responsible for choosing and using the most appropriate monitoring controls. See the examples in [Appendix 5](#).



Responsibilities



Internal employee moves

You should engage Centrica Resourcing to manage the internal recruitment process of an employee changing roles within Centrica. When an employee is transferred to a new line manager and the PEC requirements are unclear, speak to your local HR manager or the CRT to ensure the individual meets the required standard.

If an existing employee changes roles internally, further checks aren't normally needed unless they're moving from a non-customer facing, non-asset-based role into a position that:

- gives them access to customers' properties
- involves face-to-face contact with customers
- provides access to Centrica assets.

Those moving internally to one of these types of position must either undertake a basic criminal record check or be shown to have undertaken one previously for Centrica. Centrica Resourcing has a list of all employees put through this check before it was made compulsory for all new hires in January 2014.

See page 11 for definitions of a customer's property and Centrica assets.

If you are a hiring manager, you are responsible for:

- deciding how the definition applies to the site you are hiring for, considering the possibility of the individual accessing other sites that fall within the definition too. If in doubt, ensure a criminal record check is conducted
- deciding whether to conduct education or qualification checks on an internal hire (financial checks not required).

Those nominated to FCA Approved Person positions require specific checks. See page 8 of this policy.

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Responsibilities

Changes to existing employees' **repute status**

Any existing employee who has changed their good repute status during their employment must declare the changes to their line manager – or a suitable person in higher authority than themselves – as soon as possible. These include criminal proceedings, convictions, and bankruptcies.

If an individual's circumstances change and impact on their financial or criminal status, this could expose Centrica to an increased level of risk, especially if the person joins a higher risk RAG band than they were at appointment.

Where this occurs, local managers and the HR team need to establish the facts in each case and deal with them independently to establish risk exposure. Each case must refer to the individual's employment contract and relevant Code of Conduct to help inform the requirements and outcome of the case.

Local managers must look to HR's guidance, as each case is individual and unique.

Other staff

If agency staff, contractors, franchise employees or consultants are made permanent employees, conduct a level of checks appropriate to the role.



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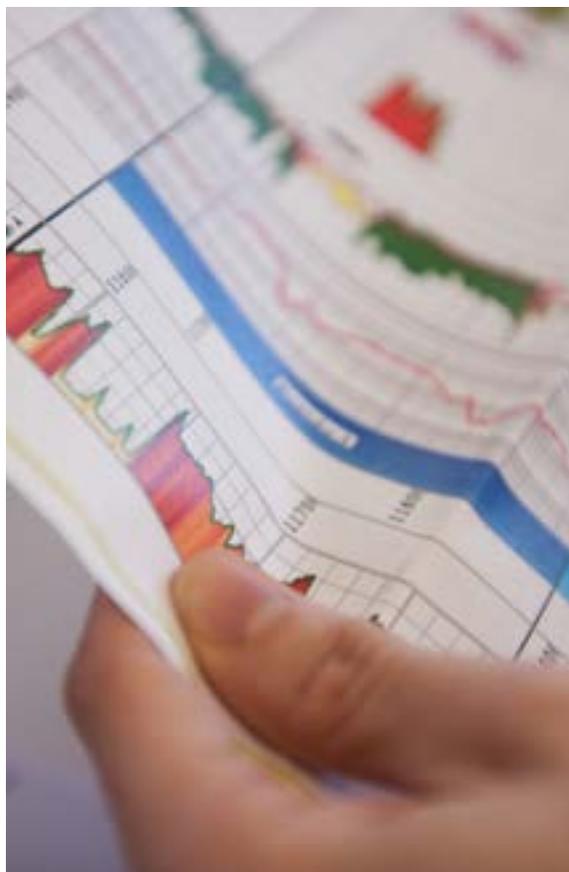
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Actions – what happens next



Governance

The Recruitment Compliance Team is responsible for the Good Repute Policy and reviewing its effectiveness.

The Approved Persons/Directors and senior management team within each business unit are responsible for ensuring their related primary controls remain robust and are developed to support this policy.

Information on what constitutes a breach or conflict will be communicated regularly to ensure continued focus on prevention and to keep within our Business Principle of Demonstrating integrity in corporate conduct.

Various mechanisms will be used including training, briefings, and communication strategies and staff appraisals. References will be made to the 'Speak Up' helpline referred to in our Business Principles and the Conflicts of Interest Register.

Raise any lack of controls or failures relating to good repute to the HR Leadership team and to the RACC and Compliance departments where appropriate.

The Resourcing Director and/or the HR Leadership team will raise and approve any variations regarding approaches to good repute, including those of an Appointed Representative, and refer them to the RACC as appropriate.

Record keeping

All such requirements must adhere to Centrica's data protection and retention policies.

All PEC information, including decision RAG records and declaration forms, are stored in recruitment systems and not in employees' personnel files.

Agency staff suppliers and outsourced providers must provide evidence that appropriate checks are made and acted upon.

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Primary control



Appendix 1

Pre-employment checking group requirements

Incremental

Centrica Group UK	FCA approved roles <ul style="list-style-type: none"> • Asylum and immigration checks • Financial check • Standard level criminal record check • 5-year work history check • Qualification and education checks* • FCA check • Director search 	Professionals and management <ul style="list-style-type: none"> • Asylum and immigration checks • Financial check • Basic level criminal record check • 3-year work history check • Qualification and education checks* 	Minimum standard – all new hires <ul style="list-style-type: none"> • Asylum and immigration checks • Financial check • Basic level criminal record check • 3-year work history check
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** A qualification/professional membership check or an education check should be conducted whenever a specific requirement for one forms part of the job specification, or where the applicant has gained an advantage in having claimed to possess them.*

Appendix 2

Pre-employment candidate RAG criteria

Red

The receiving manager or HR manager should be notified of any candidate that falls within this band and the offer withdrawn. This may only be over-ridden with L4 and HR approval. Details of this decision must be recorded on the Decision Record Form and stored in the candidate's record.

Criminal Record Check

Unspent criminal convictions shown on the basic disclosure form in relation to:

- Sex offences
- Violence against person(s)
- Possession or distribution of class A drugs
- Financial crime or fraud
- Theft
- Offences involving a weapon
- Current driving bans (field roles).

Financial Check

Four or more non-satisfied CCJs/SCDs irrespective of the total value.

Any number of CCJs/SCDs that when combined have a non-satisfied total value exceeding the greater of £3000 or 10% of base salary offered.

Non-discharged bankruptcies. Sequestration or Debt Relief Orders including where the discharge has been done but the person remains subject to Bankruptcy Restriction Order/Undertaking or a Debt Relief Restriction Order. Individual Voluntary Arrangements, Protected Trust Deeds, Administration or Composition Orders where:

- the candidate when asked has failed to cooperate with our requests for information, or
- when asked has not returned a signed IVA/PTD/Admin Order/Composition Order declaration form (Ref App 03).

Other Checks

Information received via the candidate or previous employer referencing that indicates involvement in financial crime or serious misconduct.

Unable to verify any of the references provided for the last 3 years (or 5 years in the case of a 5-year request).

Material non-disclosure or misrepresentation on the application form or during the take-on process – e.g. education/qualifications/professional memberships prove to be false.

Amber

A decision on whether or not to proceed with the offer should be made based on the role and the individual merits of the case. Details of the decision must be recorded on the Decision Record Form and stored in the candidate's record.

Criminal Record Check

Unspent criminal convictions shown on the basic disclosure form that **do not** relate to any area highlighted in the red band.

Motoring offences (field roles where a valid driving license is required) – e.g. 7 penalty points or above.

Financial Check

Three or less non-satisfied CCJs/SCDs that when combined have a total value of over £500 but not in excess of the greater of £3000 or 10% of the base salary offered.

Other Checks

A dismissal from a previous employer that was declared during the take-on process.

Information received via the candidate or previous employer referencing that indicates issues relating to performance or fitness and propriety.

Minor errors in information provided – e.g. grades of non-relevant exams.

Unable to verify the references provided for at least a total of 1 year in the last 3-year period (or 2 years in the last 5 for a 5-year request).

Green

It is acceptable to proceed with the candidate's offer. Where an IVA/PTD/Composition or Administration Order declaration form has been completed this must be stored in the candidate's record.

Criminal Record Check

No criminal convictions.

Motoring offences (non-field roles) 6 points or less on driving license (field roles where a valid driving license is required).

Financial Check

No adverse credit history.

Three or less non-satisfied CCJs/SCDs that when combined have a total value of £500 or less.

All reported CCJs/SCDs are satisfied.

All reported Individual Voluntary Arrangements, Protected Trust Deeds or Debt Relief Orders are satisfied, or that candidate has provided further information and signed an IVA/PTD/Composition or Administrative Order declaration form.

All reported Bankruptcies, Sequestrations or Debt Relief Orders are discharged and no retractions have been imposed such as a Bankruptcy Restriction Order/Undertaking or a Debt Relief Restriction Order.

Other Checks

No adverse references.

All 3 years (or 5 where applicable) accounted for (as a minimum we will accept more than 1 year accounted for in the last 3 or 2 years for a 5-year request).

No inaccuracies in the disclosure of education/qualifications/professional memberships.

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Appendix 3

Declaration for candidates

<p>Declaration form for candidates with:</p> <ul style="list-style-type: none">• Individual Voluntary Arrangements (IVA)• Protected Trust Deeds (PTD)• Administration Orders• Composition Orders.	<p>I confirm that my Insolvency Practitioner/Trustee/Court involved is aware of the terms and conditions of my offer of employment and arrangements are in place to ensure that the obligations continue to be met.</p> <p>I understand that should my financial circumstances change in any way that impacts my ability to perform the role for which I'm employed, I must make my line manager aware immediately.</p>	<p>It has been explained to me that once in employment the services of the Company's Employee Assistance Programme can be accessed at any time and that these services include financial & legal advice.</p>
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Name (print)
Signature:
Date:

Appendix 4

Decision Record

The principles underpinning our Pre-Employment Checking (PEC) process are that in making recruitment decisions we do our utmost to:

- Ensure our customers, our people and the public are safe from and not caused harm by our employees
- Protect our customers' (and our people's) assets from theft or misuse by our employees
- Protect the company's assets from the same
- Protect the Centrica/British Gas reputation and brand from damage caused by employing people of ill repute.

If any adverse report received places a candidate within the red band of the RAG guide the receiving manager or HR manager must be informed and the offer withdrawn. The only exception will be where an HR manager has been consulted and specific consent has been given by a Level 4 manager.

Where the adverse report places a candidate within the amber band you should make your decision taking into account the original principles underpinning the checks and having asked yourself the questions below. If a candidate has failed to self-declare during the take-on process, this is in itself a perfectly acceptable reason to withdraw the offer should you feel it appropriate.

You must take into account the nature of the role that you're hiring for but also bear in mind that people once hired do sometimes move within the organisation:

- Did the candidate freely declare the relevant issue when asked on their application or during the take-on process? If not, why not?
- What were the circumstances? (bear in mind you will only ever know the candidate's version of events)
- Where the issue relates to criminal convictions does the disclosure show more than one offence committed over a period of time?
- Where the issue related to criminal convictions does the offence, or the penalty imposed for it, negatively impact on the person's ability to perform the role for which they're being hired? (e.g. driving ban or high level of penalty points).

Complete and upload to candidate's i-Grasp record for all red and amber candidates.

Candidate name:
Role type:
Proceed with offer: Yes/No
Summary of issue:
Main reason for decision:
Authoriser:
Date:

Appendix 5

Primary control

QA Sales Process

This is the business as usual checking of advisors who sell insurance. Sales calls are checked for each advisor. The line manager will follow up with actions as necessary in respect of advisor training and in the case of customer detriment or suspected breaches of the quality requirements of the selling process.

Alleged mis-selling report (monthly)

This aim is to manage all reported customer instances of mis-selling, adding of products without the customers consent, duplicate products, cancel & set up new agreements, multiple contracts with same bank details, and contracts set up with own bank details. The process ensures that all reported instances of mis-selling are investigated by the responsible managers and that steps are implemented to improve performance. If an employee is found to be misusing/abusing the reward system for their or someone else's financial gain they may be suspended/excluded from such schemes and, where appropriate, the company disciplinary procedures will be followed. Criminal proceedings may also be brought against the individual(s) concerned following an investigation from the relevant fraud prevention department. A monthly report of mis-sales and re-offenders is issued.

Refund Audit Reports

These reports can audit refunds processed and ensure that they have been issued only where appropriate and to ensure that a visible audit trail is available as well as to confirm that no fraudulent behaviour has transpired.

Compensation Reports

To audit compensation transactions which have been carried out by staff and ensure there are no discrepancies. If discrepancies are found, they are highlighted and reported to the appropriate managers for feedback.

Financial Audit Process – including write-offs & outstanding balance amendments

To ensure that any transactions carried out by staff to increase or decrease outstanding balances are reported and regularly audited, investigated and any discrepancies highlighted and feedback given.

Returned Mail

To ensure that all mail returned undelivered by the Royal Mail is scanned, returned to the HCMO, investigated for reason, has appropriate action taken, and management information produced for trending. Corrective & Preventative Action includes raising AIMs (Action to Improve System).

Corrective and Preventive

The Business Integrity Corrective & Preventive Action proves identified incorrect actions taken on a customer account and process errors highlighted by a member of staff or as the result of failure to deliver acceptable customer service. The process enables such errors to be rectified and preventive action taken to ensure they do not recur and thus improve performance of service delivery. Errors are any situations that do or could adversely affect quality and performance to a British Gas customer, business process, or inter-business activity, e.g. Incorrect actions on customer account; required actions not completed; incorrect transfer of a call; failed appointment, failure to offer Standards of Service, job booking rules, etc. The process includes error reporting, data analysis, and taking corrective or preventative action, e.g. raising AIMs.

Data Capture Report

This report details all instances where an agent has input incorrect customer data and is available for all managers to view, feedback and error correction.

Audits and Assessments

The company Business Management System shall be assessed for process compliance, end-to-end process reviews and process improvement by both internal and external qualified assessors on a regular basis. This ensures that processes and policies operated within the business comply with written documentation and are consistently applied. End-to-end process reviews occur on a regular basis and improvements are implemented. Any issues or non-conformances found will have corrective actions agreed, actioned and preventive actions applied to avoid recurrence.



Useful info

Version 1 July 2014

Recruitment Compliance Team

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