

Introduction:

The purpose of this Code of Practice is to:

- Ensure good practice and responsible selling in the marketing of our fixed line telephone products and services.
- Ensure our customers and potential customers understand our services and the behaviour to be expected from our representatives.
- Provide reassurance to our customers as to what constitutes good practice in the sales and marketing of our services.

Status of the Code:

- Compliance with this code does not guarantee compliance with any legal requirement.
- Non-compliance with this code does not affect the validity of any contract between the company and the consumer, unless the law states otherwise.
- General Condition 24 on sales and marketing of fixed line telephony services.
- We aim to comply with all aspects of this condition, full details of which can be found at the Ofcom website.
- Sales, marketing, advertising and promotion.
- Customer approaches may occur in various ways e.g. promotions at events, post, fax, electronic mail, telesales or in person. In all cases, we act responsibly and do our best to comply with relevant legislation.
- Customers' wishes will be respected where they have registered with any relevant preference service, including the Mailing Preference Service, the Telephone Preference Service (TPS), the Fax Preference Service and the E-mail Preference Service.
- We will endeavour to ensure that our advertising and promotional activity complies with the British Codes of Advertising and Sales Promotion. In addition, advertising and promotional literature will be clear, unambiguous, accurate and fair, containing no false or misleading information about price, value or service and does not denigrate other companies.

Recruitment and Sales Training:

- Xi Comms follow strict procedures for the selection of staff and outsourced companies involved with direct contact with customers for the purposes of sales and marketing activity on behalf of Xi Comms.
- Whilst operating within current employment legislation, we take into account the following factors when recruiting new staff:
 - Behaviour and appearance - we recognise that the sales person may be seen as the 'public face' of the company and the industry.

Security references and relevant convictions for criminal offences will be checked and taken into account where appropriate.

- Evidence of mis-selling or lack of integrity in any previous selling employment. In addition, the applicant must provide proof of NI number, photographic proof of I.D. and two references.
- Referees cannot be related to the applicant.
- Business referees must not both be from the same company.

If a sales person transfers to another company, a copy of his or her records will be retained for a minimum period of three years.

All company property including contracts and identification badges should be returned from staff leaving the company.

- We train our sales and marketing employees to ensure they have a good understanding of our services and of industry practice in general and do not give our customers misleading advice. Our training ensures our employees are familiar with the relevant principles of consumer protection law.
- Remuneration systems for Xi Comms will not be such as to encourage misleading or exploitative sales practices. All agencies representing Xi Comms disclose all details of incentive schemes related to Xi Comms.

Customer Contact:

- Our representatives are given clear guidelines on contacting consumers' premises, particularly during the hours of darkness. No face to face contact will be made outside the hours of 08.00 to 20.00, and no telephone calls will be made outside the hours of 08.00 to 21.00, unless at the customer's request.
- All representatives will immediately identify themselves, the company they represent and the purpose of the call and the expected call duration. If visiting or meeting in person, they should draw the customer's attention to their identity card.
- All representatives will be courteous, use appropriate language and offer clear and straightforward explanations. It is essential that they do not misrepresent the services being offered. All information should be factual and accurate. They must check that customers entering into contracts understand the terms and intend them.
- All representatives will cease contact with any person who indicates that the contact is inconvenient, unwelcome, inappropriate or too long. If the customer requests it, the discussion will be ended immediately and, if making a doorstep call, the premises will be left immediately.
- Our representatives will not abuse the trust of vulnerable customers e.g. those who are elderly or whose first language is not English, or who have special needs.
- Where there is sheltered housing, contact will be made with the warden or other person in authority before any approach is made to the customer.
- We will not direct sales or marketing activity at those who it is suspected or known are under the legal age for entering into contracts.
- Marketing campaign records will be maintained for six months, including the date and the approximate time of the contact with the customer. All such records will allow subsequent identification of the salesperson(s) involved and assist in dealing with any complaint or query.

Entering into a Contract - information, order forms and contracts:

- We check that the person entering into a contract is authorised to enter into the contract for the fixed line telephone services/bills at the premises.
- Order forms and contract forms are designed such that the contractual nature of the document is clear to the customer and it contains a statement of the contractual nature of the document immediately adjacent to where the customer signs the document so the statement cannot easily be obscured or concealed.

We will give you the following information:

- The identity of the company, its address, telephone and e-mail contact details.
- A description of the telephone service chosen, including how it works, the cost of any standing charges, the payment terms, line rental, key call types and details of "protected or special support" arrangements.

The arrangements for provision of the service, including the order process and, as accurately as possible, when it is likely to start.

- The right of cancellation and the process for exercising it.
- The period for which the charges remain valid, and the minimum period of contract, and minimum contract charges, if any.

- At the customer's request, full written information about tariffs will be made available.
- If a customer signs an order form following face to face contact, or enters into a written contract, the customer will be given a copy of the order form or contract, as well as the following details in writing either at the same time or within 5 working days, unless previously supplied in writing prior to contract:
 - Information about any after-sales services or guarantees; and arrangements for ending the contract.
 - Orders placed by distance selling means will comply with Distance Selling Regulations. Our telephone scripts are designed to ensure that you understand that you are entering into a contract and you will be sent the information detailed above.
 - In the case of internet orders, a well sign-posted hyperlink to this information which is easily visible to the web site visitor will be prominently displayed with the information being readily available for downloading and printing.
 - We confirm orders where appropriate by sending a Welcome Note to you within 5 working days of a signed contract being received by us.
 - This letter will contain the following information:
 - Date of notification
 - CLI(s) affected
 - Pre Installation instructions
 - Target date of switchover
 - Xi Comms' contact details for any queries
 - This letter may be sent electronically if you have applied online and have confirmed that you wish future correspondence to be sent electronically.
 - Regardless of our method of selling, customers may cancel orders and terminate contracts in writing or by e-mail to Customer Services, 0330 333 9200, Windsor House, Cornwall Road, Harrogate, North Yorks, HG5 9JA or hello@xicomms.com

Audit of Contracts:

- We carry out regular audits of the systems, procedures and documents we use in sales and marketing.

Customer Complaints Procedure:

- Xi Comms' internal procedures for handling customer complaints also include those relating to their sales and marketing activities. We ensure that all staff and representatives who deal directly with customers are made aware of this procedure and that they should inform customers of the existence of their complaints procedure if required.
- The Code of Practice for Complaint Handling and Dispute Resolution sets out how customers may complain about the company's sales and marketing and other activity and what further steps are available if they believe their complaint has not been dealt with satisfactorily.

You should first direct your complaint to Xi Comms. If we cannot resolve the complaint to your satisfaction, you may contact the Ombudsman Service and/or Ofcom.

- Ombudsman Services
- Telephone 0330 440 1614
- Website: [www.https//;www.ombudsman-services.org](http://www.ombudsman-services.org)
- Ofcom – Riverside House, 2a, Southwark Bridge Road, London, SE1 9HA.
- Telephone 0300 123 333
- Website: www.ofcom.org.uk
- Direct Marketing Association – DMA House, 70 Margaret Street, London, W1 8SS
- Telephone 020 7291 3300
- Website: www.dma.org.uk