



**National
Customer Code**
Energy Comparators &
Energy Moving Services
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KNOW YOUR LEAD

Better practice guide to
lead generation, consent + traceability



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About this guide

Customers should be able to understand who they are dealing with and what they are agreeing to when they provide their personal information.

For businesses using third-party lead generation, this can become more complex when a customer lead passes through several organisations before reaching a comparator, moving service or retailer.

This guide has been developed through the **Energy Comparators + Moving Services Customer Code** to share practical approaches businesses may wish to consider when reviewing their lead-generation arrangements.

It is not a compliance standard or legal or regulatory guidance. The Customer Code is voluntary, and the practices outlined here are intended to support signatories in considering opportunities to strengthen customer consent, transparency and confidence.

A useful question to ask

How confident are we that we could trace a lead back to its original source and understand what the customer believed they were agreeing to?

Five better-practice considerations

1. Understand where the lead started

Where practicable, businesses could consider whether they have visibility beyond their immediate lead supplier to the original source of the customer lead.

Useful information might include the originating source or business, website or URL, date and timestamp and the path the lead took before reaching the business.



2. Understand what the customer saw

Better practice could include being able to understand or reproduce the information presented to the customer when they provided their details.

This can help a business satisfy itself that the customer would reasonably have understood that providing their information could result in contact about an energy comparison or moving service.

3. Look beyond a record of consent

A record showing that consent was obtained is useful. Businesses could also consider whether they have enough information to understand **what the customer was told and what they understood they were agreeing to.**

A record of consent tells you that consent was captured. Understanding the customer journey helps you recognise the consent behind it.

4. Consider the complete lead journey

Where several organisations are involved, businesses could consider how much visibility they have across the complete journey:

Customer → original lead source → intermediary
→ lead supplier → comparator/moving service
→ retailer

The question isn't necessarily whether every business must hold every piece of information. Rather:

- **Do we have enough visibility and assurance to be confident about the leads we accept?**
- **Is there easy access to your privacy policy?**
- **Are prospects given an opportunity to opt out?**

5. Test the customer experience

In addition to contracts and system records, businesses might consider periodically testing what happens in practice.

For example, sampling a small number of customers and asking where they first provided their details, what they thought they were agreeing to and whether they expected to be contacted about an energy comparison could provide useful insight into the effectiveness of existing arrangements.

Better-practice self-check

How well can you follow your leads?

Consider whether your current arrangements give you confidence that:

- ☐ you can identify the original source of leads where appropriate;
- ☐ you have reasonable visibility where leads pass through intermediaries;
- ☐ useful information such as source, URL and timestamp can be accessed;
- ☐ you can understand what information the customer saw;
- ☐ you can understand what the customer agreed to;
- ☐ your lead suppliers have appropriate arrangements for retaining information about source and consent;
- ☐ you have some form of assurance beyond simply accepting that consent was obtained; and
- ☐ you can investigate effectively if a customer says, "I didn't ask to be contacted."

Better visibility can support better customer outcomes.

Understanding where a lead came from, how consent was obtained and what the customer expected can help businesses identify issues earlier, strengthen relationships with lead-generation partners and give customers greater confidence in the comparison process.

Case study:

Lead A – clear trail:

Sarah visits an identifiable comparison-related page



sees clear information about what she is agreeing to



provides consent



source, timestamp and consent wording are retained



lead passes to comparator comparator can
reconstruct Sarah's journey.

Lead B – unclear trail:

Michael enters a competition online



details pass through several businesses



comparator receives a record showing "consent obtained"



original webpage and wording aren't available



Michael says he never expected an energy company to contact him.



"Would your current processes identify the difference?"



The Energy Charter

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