



OFFICE *of the*  
RAIL REGULATOR



# RAIL COMPLAINTS

*Rail Complaints Bulletin*  
*Report Number 3*

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This is the third Rail Complaints Bulletin published by my Office, and the second full year of complaint data that we have collected from passenger train operators. Complaints are often seen as a negative indication of a company's performance and to an extent this is a correct view. Customers complain when they are dissatisfied with the quality of a product or service that they have received. However complaints also represent an opportunity to understand the expectations of customers and to improve the quality or delivery of that product or service. This is the way in which I expect train operators to view complaints, and I expect them to use complaint data to make those improvements.

Complaints are a fact of life. No company will ever (if they encourage customer feedback) completely eradicate complaints. From time to time things go wrong, mistakes are made, and most customers understand this. What those customers, and I, expect from train operators is that they use the information provided in complaints to identify areas where services can be improved, and that they make those improvements. There is much work being carried out in the railway industry to improve the quality of the network, and a great many complaints from passengers will not ultimately be resolved until new trains are purchased and track, signalling equipment and stations are improved. This work is underway and, once completed, will lead to a substantially better level of service being provided. This work, however, must not be carried out at the expense of poor or deteriorating service to passengers in the short term, and must not be used by train operators as a standard excuse for every complaint.

Many areas of passengers' concern and complaint can, and should, be put right now. There are many things that train operators can do, quickly and cheaply, to improve the service provided to passengers. Improving the quality of information to passengers, both at stations and on trains, ensuring that trains are cleaned regularly and that catering stocks are sufficient, are things that should be happening now. I do not expect passengers to have to make continual complaints about these issues. The problems should be identified and rectified quickly, and I will be looking to train operators to make better use of complaint information to improve services.

To identify these problems, and ensure that the information is used to make service improvements,

train operators must see complaint management as a key business function. I am pleased to see that during the last year a number of train operators have made significant investment in this area and are now focusing on proactive complaint management rather than reactive complaint handling. Other operators have a long way to go, however, to reach this position. It is simply not acceptable for customers to be unable to contact train operators, or to wait a long time for a reply and then only receive a poor quality proforma response. Train operators should value complaints from their customers and, accordingly, should ensure that their customer service teams have sufficient resources to deal with customer complaints quickly and effectively. Neither I, nor passengers, can have any confidence that a train operator is committed to making service improvements if it cannot even provide a staffed telephone number throughout office hours, or if it provides responses that bear no relation to the complaint made. Where I have such evidence of such poor performance by train operators, I will take clear and firm action to secure improvements for passengers, as my Office has already done with a number of operators during the last year.

The data in this report has been provided by the train operators themselves. During the year, my Office has commissioned an external, independent assessment of their ability to record and report accurate information on complaints to the Regulator. The report of our consultants has exposed a number of inaccuracies and inconsistencies in the way in which train operators collect, record and report on complaints. I will be taking up the recommendations made in the report to improve the quality of the information published in future bulletins. There are a number of actions for my Office to take in terms of clarifying how operators should report information, but I am concerned that a number of examples of poor data recording were identified. This should be as much a concern for the train operators as it is for me, since it suggests that the information reported internally within some train operating companies may not be completely accurate. I am very concerned that some train operators may not fully understand their own information and will be following this up during the year.

TOM WINSOR  
Rail Regulator August 1999

## Monitoring performance

- Over 1,000,000 complaints were registered by the passenger train operators in 1998-99. 700,000 of these were made in writing and nearly 300,000 by telephone. This represents 122 complaints per 100,000 journeys.
- Train operators have different target response times to customer complaints. Measured against a 20 working day benchmark, individual train operator performance ranges from 67% of cases closed within that time to 100% of cases closed.
- The largest single reason for passengers to complain is train service performance which accounts for 55% of all complaint comments registered.
- 53% of written complaints were made on pre-printed complaint forms. At an individual train operator level, this ranges from 87% to 10%.

## The Regulator's conclusions

- Train operators should actively seek customer feedback on their services. The information gathered from passenger complaints should be used to initiate service improvements.
- A number of train operators need to provide their customers with better access by telephone and to make it easier to fully resolve passenger complaints by telephone.
- Most train operators have improved their speed of response to customer complaints. A small number need to make further improvements.
- Train operators must focus on quality of complaint handling as well as speed.
- There is further work to be done to improve the accuracy and consistency of complaint data provided to the Regulator.

## Next steps

- The Regulator plans to pursue improvements to the quality of complaint data provided by train operators and published in this report, and to require annual audits of the data provided.
- The Regulator plans to consult train operators on changes to their Complaint Handling Procedures to improve the delivery of service to passengers.

## Principles of good complaint handling

Each train operator has a licence obligation to have a complaints handling procedure in place which has been approved by the Regulator, and is based on guidelines issued by him. These guidelines set out the principles which the Regulator expects to see reflected in train operators' procedures (see Annex A). At their core are the Service First (formerly the Citizen's Charter Unit) principles that complaints systems should:

- be easily accessible and well publicised;
- be simple to understand and use;
- allow speedy handling and provide for information on progress;
- ensure a full and fair investigation; and
- ensure an effective response and appropriate redress.

The Regulator's guidelines also lay down the processes for complaints handling. Train operators should be the first point of receipt for complaints since they are responsible for service delivery. Rail Users' Consultative Committees (RUCCs) can be involved where complainants are dissatisfied with a train operator's response. If the RUCCs cannot resolve a complaint themselves they can refer the matter to the Regulator who has a wider range of powers.

## The Regulator's Role

The Regulator's role in complaints handling is to:

- Set standards – through approving operators' complaints handling procedures and subsequent revisions to those procedures.
- Monitor compliance with these standards – through receiving direct feedback in the form of correspondence from members of the public and MPs, from individual monitoring of key complaints statistics provided by train operators, and through independent auditing of train operators' complaint handling procedures and systems.
- Promote Best Practice by facilitating the sharing of best practice information throughout the industry.
- Enforce standards – by using his formal powers to secure improvements for the benefit of passengers.
- Resolve cases referred from RUCCs - by investigating and taking appropriate action.

## Introduction

The Regulator requires train operators to provide him with regular data on the number of complaints made by passengers, the nature of those complaints, and their performance at responding to passengers. In this report, complaint refers to a single contact from a passenger to a train operator, even where that contact contains several issues.

In this report we have shown for each train operator:

- the total number of written complaints received between 1 April 1998 and 31 March 1999;
- the percentage of total complaints made by telephone;
- the percentage of written complaints received on pre-printed forms; and
- the percentage of complaints closed within 20 working days and the percentage within each operators' target closure time.

We have also produced tables showing each train operator's complaints received against the total passenger journeys and total passenger miles recorded for that train operator. Additionally, for the industry as a whole, we have shown the total number of letters and phone calls recorded and the subject matter of those complaints registered.

## Data accuracy

The information in this report relates solely to those complaints made direct to train operators. Only data which is sufficiently robust is being published in this report. During the year we commissioned consultants to carry out an independent audit of the accuracy and consistency of the data provided by train operators.

The report produced by our consultants identified a number of areas of concern about data quality. They have produced detailed recommendations which we will be progressing in discussion with the train operators.

Key areas of concern identified within the report are:

- some train operators have included general telephone enquiries in their telephone complaint volumes;
- that some train operators have included Passenger's Charter compensation claim forms within their complaint totals, whilst others have not; and

- that a number of train operators are adopting different practices in relation to the date of receipt recorded for complaints – the data on which speed of response to complaints is based.

We have tried to ensure that the data in this report is as consistent as possible, by clarifying with operators whether the data for telephone complaint volumes includes general enquiries, and whether their written complaint volumes include Passenger's Charter claim forms. The issue of the adoption of different practices for recording the date of receipt for complaints is a more serious one which we are taking up with operators. Due to the inconsistencies in this data, caution should be exercised in comparing the performance of different operators.

It is important to note that before the publication of the Regulator's first Rail Complaints Bulletin, the data contained in this report was never published in this format for the privatised rail industry. Whilst the Central Rail Users Consultative Committee (CRUCC) has published data about the number of passengers making complaints to its Regional Committees, that data excludes the much larger number of initial complaints made direct to train operators.

## Total complaint volumes

**Table 1:** Total complaints reported by passenger train operators for 1998-99

Total written complaints	Total telephone complaints	Total complaints journeys	Ratio to passenger
737,276	335,627	1,072,893	122:100,000

In the year 1998-99, passenger train operators received a total of 1,072,898 complaints, equivalent to 122 complaints per 100,000 passenger journeys. This represents an increase of 11% on the figure for the previous year. This increase should be seen against a rise of 5% in passenger journeys made in the same year. There are a number of possible reasons for this increase in complaints. In the year covered by this report, overall train service performance as measured by the shadow Strategic Rail Authority worsened, and there is a clear correlation between service performance and complaints volumes.

However, in the year, a number of train operators have taken measures to improve their accessibility, particularly by telephone, and improved ease of complaint may also be a factor in the number of complaints made. The increase in complaints made to

passenger train operators overall also disguises significant differences in increases or decreases in complaints made to individual operators. The number of written complaints made to individual operators is detailed in Table 2 below.

Due to the previously expressed concerns in the report on data consistency care should be taken in drawing comparisons between individual operators. Having said that, as explained in previous Rail Complaints Bulletins, there is a clear correlation between the type of rail services provided and the number of complaints received related to passenger journeys.

Train operators operating primarily commuter based rail services receive a lower level of complaint related to passenger journeys than operators providing primarily longer distance leisure or business rail services. It is understandable that passengers who travel regularly on the railway will have a different expectation of the level of service provided, and a different understanding of how to use the railway than passengers who use the railway less frequently. This may account for the step change in the number of complaints received per 100,000 passenger journeys between longer distance train operators and those with primarily shorter average journey lengths.

Train company	Written complaints per 100,000 journeys	Written complaints on pre-printed forms per 100,000 journeys
Anglia Railways	323	258
Cardiff Railways	31	14
Central Trains	92	57
Chiltern Railways	81	47
Connex South Central	21	10
Connex South Eastern	19	7
First Great Eastern Railways <sup>1</sup>	45	39
First Great Western	399	186
First North Western Trains	97	50
Gatwick Express	18	10
Great North Eastern Railway	579	244
Island Line	10	1
LTS Rail	26	17
Merseyrail Electrics	17	6
Midland MainLine	261	156
Northern Spirit	48	24
ScotRail Railways	34	16
Silverlink Train Services	54	39
South West Trains	31	17
Thames Trains	37	15
Thameslink Rail	34	10
Virgin CrossCountry	890	501
Virgin West Coast	730	462
Wales & West Passenger Trains	183	79
West Anglia Great Northern	32	18

1. First Great Eastern's complaints totals include Delay Repay claims not included in last years report

**Table 2:**  
Number of written complaints received per 100,000 passenger journeys by train operator

### *Resolving complaints at source*

This report only includes data on complaints made to train operators by letter, fax, e-mail, comment cards or telephone. It does not include complaints made directly to railway staff by passengers during their journey. It is right that train operators should try and resolve passenger concerns and complaints at source, providing immediate redress where possible and, if handled well, these concerns should reduce the number of complaints made more formally to the train operators. Complaints made and resolved at source, should however, not be ignored by train operators. They should try and capture this information as much as that from more formally made complaints, to identify service improvements that could be made and reduce the future level of passenger complaints.

### *Accessibility of complaint procedures*

Research carried out by the Office of Fair Trading (OFT) in 1996 suggested that 19% of railway and underground passengers were dissatisfied to some extent with the service which they purchased<sup>1</sup>. It is important that all businesses understand the concerns of their customers and seek to obtain as much feedback from their customers as they can. OFT research also shows that 70% of customers will take their business elsewhere if they are dissatisfied with a product or service and do not complain, whereas 75% of customers will remain brand loyal if they complain and their complaint is resolved satisfactorily<sup>2</sup>.

There is, therefore, significant benefit in encouraging complaints, and ensuring that those complaints are dealt with effectively. Train operators, like all businesses, will not be able to meet the expectations of their customers if they do not understand what those expectations are. All train operators have an obligation to make their complaint procedures accessible to passengers. One of the ways in which this is achieved, is by making pre-printed customer comment forms available. Details of the percentage of all written complaints made on these forms by individual train operators are shown in Table 3 following.

**Table 3: Percentage of written complaints received on pre-printed complaint forms**

Train Company	Percentage of written complaints received on pre-printed forms
Anglia Railways	80
Cardiff Railways	47
Central Trains	63
Chiltern Railways	58
Connex South Central	48
Connex South Eastern	37
First Great Eastern Railway	87
First Great Western	47
First North Western Trains	52
Gatwick Express	57
Great North Eastern Railway	42
Island Line	10
LTS Rail	68
Merseyrail Electrics	33
Midland MainLine	60
Northern Spirit	49
ScotRail Railways	47
Silverlink Train Services	72
South West Trains	57
Thames Trains	42
Thameslink Rail	31
Virgin CrossCountry	56
Virgin West Coast	63
Wales & West Passenger Trains	43
West Anglia Great Northern	55
INDUSTRY TOTAL	55

<sup>1</sup> *Consumer dissatisfaction – Research paper 9 (November 1996)*

<sup>2</sup> *Consumer loyalty (1990)*

### *Making complaints by telephone*

Increasingly, customers wish and expect to be able to conduct their contact with businesses by telephone, and more recently, by e-mail. This expectation is one which train operators must do more to meet, in terms of enabling passengers to make, and importantly resolve, complaints by telephone.

Train operators have recognised the benefits of providing telesales services to allow passengers to buy tickets by telephone, and the 57 million calls made in 1998 to the National Rail Enquiry Service (NRES) for information about railway services are testimony to passengers' desire to use the telephone to conduct business. Unfortunately, the figures shown in Table 4 suggest that several train operators do not make it easy for passengers to make complaints by telephone, with only 31% of reported complaints to all train operators being made by telephone.

A number of train operators have improved their call answering facilities, and have ensured that their call centres are sufficiently well resourced to answer passenger complaints. These companies are to be applauded, and the Regulator will be looking to other train operators to follow their example. The Regulator is concerned, however, that even where it is easy for passengers to make complaints by telephone, the procedures adopted by train operators often act to dissuade passengers from using the telephone. Many operators require passengers to follow up their telephone complaints in writing – a requirement that may be reasonable in some cases, but which can act to dissuade passengers from pursuing their complaint.

Train operators must ensure that, as far as possible, they seek to resolve telephone complaints from passengers either during the initial call, or by a return telephone call. There is as much benefit to the train operators themselves as to passengers in this policy. Use of the telephone to resolve complaints is generally faster, administratively more efficient and cheaper, and the direct contact with passengers may help to ensure that all of their concerns are addressed fully, which may lead to greater levels of customer satisfaction.

### **Resolving complaints**

It is of course vital that passengers receive prompt, full and considered responses to any complaints that they may make and the Regulator is pleased to be able to report significant improvement by the majority of train operators in their speed of response to written complaints. All but six operators have reported a greater percentage of complaints receiving a full

**Table 4: Percentage of total complaints received by telephone, by train operator**

Train Company	Percentage of total complaints received by telephone by train operator
Anglia Railways	4
Cardiff Railways	13
Central Trains	1
Chiltern Railways	19
Connex South Central	17
Connex South Eastern	19
First Great Eastern Railway	4
First Great Western	29
First North Western Trains <sup>1</sup>	38
Gatwick Express	4
Great North Eastern Railway <sup>1</sup>	35
Island Line	21
LTS Rail	1
Merseyrail Electrics	64
Midland MainLine	4
Northern Spirit <sup>1</sup>	45
ScotRail Railways	10
Silverlink Trains Services	27
South West Trains	12
Thames Trains <sup>1</sup>	71
Thameslink Rail	24
Virgin Rail <sup>1,2</sup>	30
Wales & West Passenger Trains	17
West Anglia Great Northern <sup>1</sup>	76
INDUSTRY TOTAL	31

<sup>1</sup> Includes general enquiries as well as complaints  
<sup>2</sup> Virgin cannot split telephone calls between CrossCountry and West Coast

response against both of the standards shown in Table 5. Unfortunately, a small number of operators have reported an unacceptably low percentage of cases closed within their own target response times.

We made it clear to those operators concerned that their obligations to passengers must be met, and towards the end of the year improvements were made, which we expect to continue.

Successful resolution of customer complaints is something that train operators must strive for. Not only is it expected by the Regulator and by passengers, but it is in their own interests. Complaint management should not be a linear path with the sole aim being to answer complaints as quickly as possible, but a circular relationship, using information from complaints to improve service delivery and performance, which should help reduce the number of future complaints, while also improving customer loyalty.

Prompt responses to complaints do not in themselves guarantee customer satisfaction. As important is the quality of the response and the consideration of appropriate redress, which may range from a simple explanation and apology, to monetary or other compensation. Whilst we expect train operators to

provide prompt responses to passenger complaints, this must not be achieved at the expense of response quality. In measuring the quality of train operators' complaint handling, the Rail Users' Consultative Committees (RUCCs) play a very important role, and we look to the Committees to advise the Regulator of instances of poor complaint handling, so that action can be taken.

## Types of complaint

For train operators to be able to use information from complaints effectively in making improvements to services, they must be able to fully analyse the data they receive. We require operators to break down the complaints they receive into 12 major subject categories. Each complaint contact may have more than

Train Company	% of written complaints closed within 20 working days	% of written complaints closed within operator's own target response time	Train operators' target response times
Anglia Railways	100	83	10 calendar days
Cardiff Railways	79	68	15 calendar days
Central Trains	100	98	3 weeks
Chiltern Railways	100	96	10 working days
Connex South Central	97	82	10 working days
Connex South Eastern	98	84	10 working days
First Great Eastern Railway	98	94	10 working days <sup>1</sup>
First Great Western	100	36	5 working days
First North Western Trains	93	81	5 working days
Gatwick Express	98	89	10 working days
Great North Eastern Railway	67	67	20 working days
Island Line	100	96	10 working days
LTS Rail	67	40	5 working days
Merseyrail Electrics	100	100	20 working days
Midland MainLine	91	91	20 working days
Northern Spirit	99	100	1 month <sup>2</sup>
ScotRail Railways	93	93	20 working days
Silverlink Train Services	69	59	10 working days
South West Trains	98	91	10 working days
Thames Trains	86	77	10 working days
Thameslink Rail	97	92	10 working days
Virgin CrossCountry	74	46	10 working days
Virgin West Coast	74	47	10 working days
Wales & West Passenger Trains	89	85	10 working days
West Anglia Great Northern	99	97	10 working days

<sup>1</sup> 10 days from January 1999

<sup>2</sup> 15 days from January 1999

**TABLE 5:**  
Target response time and % of written complaints closed within target by train operator

one complaint issue, and we expect operators to be able to capture and report on all of these issues. Figure 1 shows, for all train operators, the percentage of complaints by category made by passengers.

We intend to be able in future to break this information down by individual train operator, but are concerned that not all operators are yet able to record every complaint issue within a complaint contact accurately. Many train operators have installed, or have commissioned, new complaint recording systems that allow full recording of complaint issues, and we will be discussing with other operators the actions they need to take to achieve this.

As not all operators are currently recording all complaint issues, the data shown in Figure 1 does not show the full picture, but is, nevertheless, broadly accurate across the industry.

Figure 1 shows that over half of all complaint issues made in the year were about train service performance, although, compared to 1997-98, this figure has fallen in proportion to other complaints. Complaints about train quality and fares, retailing and refund issues both account for over 10% of all complaint types, with the retailing and refund issues having increased on the figure for the previous year.

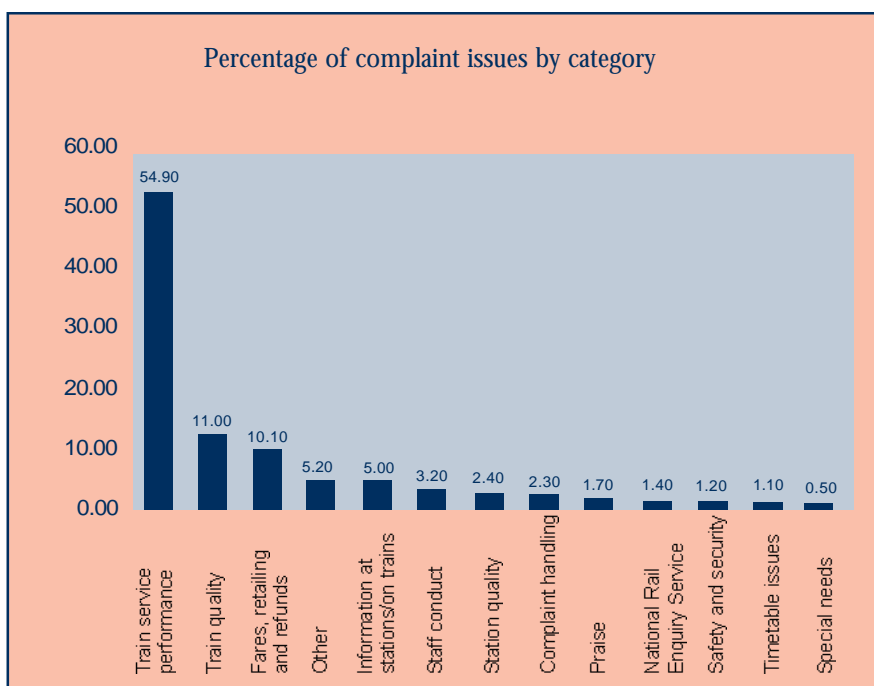
Significantly, the improvements in performance made by NRES in the last year have resulted in a substantial fall in the number of complaints made about the service.

## Data quality

ORR has completed an independent assessment of the train operators' ability to record and report complaint data accurately. The report produced by the consultants who carried out the assessment has identified a number of weaknesses in processes for providing consistent and accurate information and ORR is considering their recommendations for securing improvement. We intend to discuss with train operators the basis on which complaint data is gathered and provided to the Regulator, and to take steps to improve the data quality. These actions should provide a greater degree of confidence in the data published in future reports and will allow more definitive comparisons to be made between individual operators and by a single operator over time. ORR also intends that once these actions have been taken, there should be an annual audit of the data provided by operators to provide assurance of its accuracy.

## Developing standards

The Regulator plans to consult train operators on revisions to his document *Summary of Principles for Complaints Handling Procedures* (at Annex A) during 1999-2000. The proposals for consultation will include measures to improve consistency between train operators' procedures for handling complaints from passengers, and measures to introduce standardised, enforceable measures against which train operators' performance in handling complaints against their own targets can be measured.



**Fig 1: Percentage of complaint issues by category**

## Annex A

### Summary of principles for complaints handling procedures

#### Introduction

1. Passenger and station operators are required to have complaints handling procedures, approved by the Regulator, in place from commencement of licensed operations.
  2. Operators are recommended to consult the Citizen's Charter Complaints Task Force booklet *Effective Complaints Systems, Principles and Checklist* in preparing their complaints handling procedures. (Booklet available free of charge from the Citizen's Charter Unit, Government Offices, Horseguards Road, London SW1P 3AL. Tel: 0171 270 1838). This booklet covers the principles and procedures needed for an effective complaints handling process. Operators are free to propose whatever procedures best suit the needs and expectations of their customers and the requirements of their business. However, this note sets out fundamental principles, which the Regulator will expect to see reflected in any complaints process submitted to him for approval.
- be addressed. The Regulator's preference is that a notice should be posted in each carriage of a train, as well as at stations. In cases where rolling stock is regularly shared between more than one train operator, the notice could say either:
- that passengers should consult a notice at their destination station for the name and address to which complaints should be sent; or
  - that passengers can get a complaint, comment or Passenger Charter form from the guard or conductor (in the case of staffed trains).
5. Complaint/comment forms should be available on-train wherever possible as well as at each staffed station. At unstaffed stations, a notice should be displayed saying where claim forms can be obtained. Posters should be prominently displayed at all stations. At multi-operator stations, posters need to make clear who the different contact points are for complaints about different services. An important point is that all material publicising the complaints handling procedure, including posters, should display the address and telephone number of the relevant Rail Users' Consultative Committee(s) (RUCC).

#### Principles

3. Complaints systems should:
  - be easily accessible and well-publicised;
  - be simple to understand and use;
  - allow speedy handling, with established time limits for action, and keep people informed of progress;
  - ensure a full and fair investigation;
  - respect people's desire for confidentiality;
  - address all the points at issue and provide an effective response and appropriate redress;
  - provide information to management so that services can be improved and
  - observe the Passenger's Charter on matters relating to service performance.

#### Accessibility and publicity

4. The guiding principle is that it should be easy to complain and to find out to whom a complaint should
6. All front-line staff should be trained to receive and pass on complaints. The customer should not have to find the 'right' person unless they particularly want to. Moreover, passengers may not know to which operator to address a complaint. At the very least, operators should be ready to co-operate in passing on complaints to others if the complainant has come to the wrong operator. The passenger should only have to write one initial letter of complaint. Where appropriate, operators should consider co-ordinating a single response.
7. Operators should have clear internal procedures and timescales for replying to complaints which everyone understands, as well as a system for chasing difficult cases.
8. One option worth considering is giving discretion to certain front-line staff to resolve certain types of

#### Simplicity of understanding and use

complaint on the spot, without reference to senior management. Sensitive on the spot handling of difficult situations may help to avoid a large number of written complaints.

### Full and fair investigation

9. The key requirement here is for good, clear internal procedures with minimum recourse to ad hoc decisions on how to deal with a particular complaint.

### Effective response and appropriate redress

10. Replies to complaints should mention the relevant RUCC(s) as the next port of call in any case in the letter containing the operator's final offer, but never later than the second reply to the complaint. The address and telephone number of the relevant RUCC(s) should also be given. Operators will need to establish rules or guidance on the types of redress available and the level of authorisation needed.
11. For the system to continue to be effective, a means of regularly reviewing procedures is desirable and there should be some sort of regular report to management on both the number and type of complaint. The Regulator will also wish to see periodic statistics on complaints as part of his regular monitoring of licence compliance. The Regulator will wish RUCC(s) to receive the same information as he receives himself.

### Interface with insurance claim publicity and procedures

12. The Claims Allocation and Handling Agreement approved by the Regulator requires his separate

approval to arrangements for publicising information on how to make an insurance claim against an operator. Operators will need to consider the options for dealing with on-train information on both complaints and insurance. One possibility is for two separate contact points to be published. Another is for one contact point to be identified but for there to be clear internal procedures for insurance claims to be passed on to the relevant handling contact as quickly as possible.

### Consultation

13. The Regulator will expect operators, as a matter of course, to consult their local RUCC(s) and take account of their comments before submitting their complaints procedures to him for approval. It will be a condition of the licence that the RUCC(s) are consulted on all proposed changes to approved procedures before these changes are submitted to the Regulator for approval.
14. In order to meet the requirement to have complaints handling procedures approved by the Regulator in place from commencement of licensed operations, operators should:
  - begin their consultation with the RUCC(s) at least eight weeks before commencement of licensed operations and
  - submit their proposed complaints handling procedure to the Regulator at least three weeks before commencement of licensed operations.

## Annex B

*Number of complaints received per 1,000,000 passenger miles by train operator*

Train Company	Total written complaints per 1,000,000 miles	Written complaints on pre-printed forms per 1,000,000 miles
Anglia Railways	55	44
Cardiff Railways	33	15
Central Trains	42	26
Chiltern Railways	30	17
Connex South Central	14	7
Connex South Eastern	13	5
First Great Eastern Railway	24	21
First Great Western	46	22
First North Western Trains	53	27
Gatwick Express	7	4
Great North Eastern Railway	37	16
Island Line	22	2
LTS Rail	14	9
Merseyrail Electrics	26	8
Midland MainLine	30	18
Northern Spirit	24	12
ScotRail Railways	18	8
Silverlink Train Services	33	24
South West Trains	16	9
Thames Trains	21	9
Thameslink Rail	16	5
Virgin CrossCountry	81	51
Virgin West Coast	49	35
Wales & West Passenger Trains	52	23
West Anglia Great Northern	16	9

## Annex C

### Train Operator Base Data

*Total written complaints 1998-99 by train operator*

Train Company	Total number of written complaints	Total written complaints made on pre-printed forms
Anglia Railways	21,866	17,524
Cardiff Railways	1,873	874
Central Trains	31,659	19,834
Chiltern Railways	7,847	4,540
Connex South Central	20,194	9,603
Connex South Eastern	23,636	8,662
First Great Eastern Railway	24,519	21,211
First Great Western	67,183	31,371
First North Western Trains	26,698	13,763
Gatwick Express	834	479
Great North Eastern Railway	80,348	33,790
Island Line	72	7
LTS Rail	6,296	4,250
Merseyrail Electrics	4,302	1,420
Midland MainLine	17,609	10,516
Northern Spirit	20,892	10,310
ScotRail Railways	19,802	9,385
Silverlink Train Services	18,615	13,317
South West Trains	37,763	21,398
Thameslink Rail	11,525	3,542
Thames Trains	11,565	4,803
Virgin CrossCountry	123,251	69,296
Virgin West Coast	116,157	73,566
Wales and West Passenger Trains	25,134	10,862
West Anglia Great Northern	17,691	9,762
TOTAL	737,276	404,030

*Total passenger journeys and passenger miles 1998-99 by train operator*

Train Company	Total passenger journeys 1998-99	Total passenger miles 1998-99
Anglia Railways	6,780,000	394,818,000
Cardiff Railways	6,124,000	56,401,000
Central Trains	34,544,000	760,298,000
Chiltern Railways	9,629,000	265,523,000
Connex South Central	98,345,000	1,434,955,000
Connex South Eastern	122,163,000	1,849,742,000
First Great Eastern Railway	54,304,000	1,009,773,000
First Great Western	16,850,000	1,445,659,000
First North Western Trains	27,587,000	505,382,000
Gatwick Express	4,544,000	122,524,000
Great North Eastern Railway	13,873,819	2,169,116,437
Island Line	702,000	3,310,000
LTS Rail	24,685,000	455,581,000
Merseyrail Electrics	25,076,064	165,800,000
Midland MainLine	6,759,000	580,599,000
Northern Spirit	43,674,000	860,271,000
ScotRail Railways	58,956,000	1,128,700,000
Silverlink Train Services	34,290,000	558,576,000
South West Trains	122,852,000	2,291,580,000
Thameslink Rail	34,355,000	709,752,000
Thames Trains	31,044,000	551,803,000
Virgin CrossCountry	13,841,000	1,365,190,000
Virgin West Coast	15,919,000	2,087,863,000
Wales and West Passenger Trains	13,711,000	481,790,000
West Anglia Great Northern	55,270,369	1,102,493,000
<b>TOTAL</b>	<b>875,878,252</b>	<b>22,357,499,437</b>

## Annex D

### Individual Train Operator Commentary

*Each train operator has been offered the opportunity to provide commentary on their statistics and, where provided, their comments have been shown below.*

#### **Anglia Railways**

We have made significant positive progress in customer relations issues over the last year. During 1998–99, the number of complaints we received fell by over 20%. This is a reflection of improved train service performance where better punctuality and reliability meant fewer passengers suffered unsatisfactory journeys. We have continued to upgrade the standards and responsiveness of our customer relations service.

Over 80% of the correspondence was received on pre-printed forms, demonstrating the convenient process for contacting us. Over 83% of complaints were answered within 10 days and 100% within 20 days, following better management of correspondence and recruitment of additional members to the customer relations team.

A further upgrade to our Passenger's Charter enhanced the standard of service travellers can expect in terms of punctuality, compensation and provision for the disabled and those with bicycles.

In summary, we have maintained our approach of continuous improvement in the handling of customer relations issues, delivering a better service and higher standards for our passengers. We intend to maintain our position as one of the most proactive train operators in this respect.

#### **Central Trains**

1998–99 saw an increase of nearly 7% in passenger journeys and passenger miles for Central Trains.

Our aim is to provide a value for money service operated by clean, reliable and comfortable trains. This will be further taken forward with the delivery of our new trains. Customer feedback is vital to the business and is encouraged and welcomed. Therefore, a great deal of effort has been put into ensuring that our customers know how to contact us and that the process

for doing so is as easy as possible. This has been done particularly by the widespread provision of postage-paid comment and charter claim cards.

Within the customer relations team the focus has been on ensuring that customers receive a quick response and that the information received from customers is used to identify improvement opportunities.

#### **Chiltern Railways**

The volume of complaints received in 1998–1999 was disappointing but reflects a year in which we faced a number of challenges and delivered some major investments. One of the most notable has been our project to double 18 miles of single track between Princes Risborough and Bicester North. The doubling project has since allowed us to introduce new, faster clubman trains, reduce journey times and substantially increase the number of services at many stations. Unfortunately such major work does inevitably mean some disruption to passengers while it is carried out.

Punctuality remains our passengers' top priority, and where delays occur, the most common cause for complaint. Working with our partners Adtranz and Railtrack we have implemented a robust action plan to tackle delays head on. Highlights include the following:

- Chiltern Railways funded and built a second platform at Princess Risborough. Representing an investment of £600,000, the new platform has already proved invaluable in easing congestion and reducing delays.
- All the engines on our 165 fleet of trains have been replaced at a cost of roughly £30,000 per engine.
- We have recruited 42 additional drivers, increasing our driver numbers by 32%. This ensures we have extra resources needed to effectively and quickly

respond to problems in times of disruption and thereby reduce the knock-on effect of delays.

- We redesigned our timetable to ensure greater reliability. As a result of our actions, our punctuality performance increased to 95% by the end of the year.

### ***Connex South Central and Connex South Eastern***

Connex knows that its customers want a punctual and reliable service. Latest performance figures reflect all the hard work delivered by people throughout the business.

- Kent Link 90.5% punctuality and 99.2% reliability, period ending 29 May 1999. August targets of 88% and 99% respectively.
- Kent Coast 93.7% punctuality and 99.5% reliability against standards of 85% and 99% respectively.
- South London Lines 94% punctuality and 99.5% reliability against standards of 90% and 99% respectively.
- Sussex Coast 89.6% punctuality and 99.3% reliability against charter standards of 87% and 99% respectively.

Kent Link's performance improvement is a reflection of an action plan to improve reliability of the networker fleet that we inherited. A £1.7 million programme of modifications is beginning to pay off.

We now have Connex News Update posters at all of our stations to inform our customers of the important things that we are doing, for example a £17 million investment in a new Customer Information System for the whole of the Connex region. The first phase is being tested in the South Central Metro area, due to go live later this summer, and will cascade down to other Connex areas.

Our programme for automatic ticket gates is cutting ticketless travel and other rail crime. There is a reduction of 50% in reported crime at some stations. This complements other investment to improve security such as CCTV on stations and trains, improved station lighting and licensing.

Connex are soon to launch the GENESIS project, to transform rail travelling on Swale/Medway areas of Kent. This project is about improving our station facilities (toilets, staircases, security etc.) resulting from our customers comments. This is the first time that several stations on one route have been generated in this way simultaneously.

New trains are on order for Connex South Eastern to continue the replacement of older slam door trains. Testing will begin shortly in the Kent area. This follows on from 16 networker express trains introduced in 1997 which offered our customers a much more pleasurable travelling environment.

January 1999 saw the cost of season tickets fall for many of our customers. Our customers are now able to buy their season tickets quickly, by telephone, using Connex Direct, a new service dedicated to the renewal of travelcards.

Connex are happy to be a part of a wide series of integrated transport schemes throughout the network, combining rail and bus travel.

### ***First Great Eastern Railway***

In the last year 54.3 million journeys were made on First Great Eastern trains totalling more than one billion passenger miles.

During the year, the company introduced a very high frequency Metro service between London and Sheffield and introduced more fast trains everyday on the Liverpool Street and Southend Victoria route. Sunday services have been enhanced with three trains each

hour running on all main routes. More than 1,000 extra seats have been added to the timetable during peak periods, and over 500 extra trains a week added throughout the timetable.

Journey times have also decreased and are now typically four or five minutes faster than two years ago. The fleet of class 321 sliding door trains has had extensive refurbishment to the First Class accommodation and most of the Standard Class accommodation has received new seat covers.

The volume of complaints and compensation claims against First Great Eastern has reduced by 27% compared to last year. This reflects the generally better train performance and a reduction in instances of major train service disruption. Season ticket discounts for poor performance have not been triggered but our Delay Repay scheme which compensates both daily ticket holders and season ticket holders is a major factor in the volume of compensation claims paid. Compensation claims accounted for 75% of the complaints total of 24,519 shown in this report.

Our Customer Service Centre which is open from 0630 to 2230 each day is widely advertised on all First Great Eastern posters and leaflets, and can now be accessed via-email through the First Great Eastern Website.

#### ***First North Western Trains***

First North Western welcomes good and bad comments from its customers as they help the company to understand what is important to them and to make improvements where necessary.

The number of written complaints received in 1998–99 increased by 60.5% compared with the previous year. This was mainly as a result of the well publicised fall in train service performance that was experienced towards the middle of the year and also major timetable changes in May, some of which were not well received. There was also a large number of complaints about the

Manchester North Resignalling Scheme in the Manchester Victoria area undertaken by Railtrack which resulted in major alterations to First North Western services between July and September.

An action plan was implemented to improve train performance which is now very good with all charter targets being exceeded. This led to a significant fall in the number of complaints received in the last four periods of the year and they are now at their lowest for two years.

#### ***Great North Eastern Railway***

GNER is a customer-facing organisation that actively encourages customer feedback through the distribution of pre-paid comments forms, complaints forms if trains are late and the widespread publication of Customer Relations contact details. GNER welcomes the feedback offered by customers on the services that we provide. If customers are disappointed or let down then we have a responsibility to do what we can to put matters right.

In our pursuit of service feedback it is particularly encouraging to be able to report a significant fall in the volume of complaints coupled with a 50% rise in the number of letters of praise.

GNER continues to invest in the systems and processes to ensure that we can respond quickly and effectively to customers who raise concerns. In turn, we will use this information as part of our service planning and specification processes to ensure that new initiatives take account of previous feedback.

In submitting these annual figures, we would like to re-iterate our concern of last year that we do not believe they satisfactorily illustrate the wide variety of issues – not just complaints – that customers raise when they deal with Customer Relations.

While we received 80,348 items of written

correspondence last year, approximately 54% are defined as a complaint on the complaints handling system. We also received 43,439 telephone calls from customers during 1998–99 but only around 15% are to raise a complaint. We must not overlook the use of Customer Relations departments as the provider of ‘consumer helpline’ type service to customers.

In separating out true complaints from other types of customer contact we believe we can demonstrate a more meaningful picture of customer feedback. Most key areas of our business activity show substantial percentage decline in the numbers of letters received as outlined above. We believe this is a direct response to the investment GNER has made in our people, our trains and stations and the standard of service we are able to provide a result. The 50% rise in letters of praise validates this.

We look forward to further debate on equalising the reporting process.

### ***LTS Rail***

The increase in complaints is directly attributable to a series of major failures of overhead line equipment causing disruption to commuter services. One busy commuter train can carry more than 1,000 passengers so the impact on complaint figures caused by a single major incident can be considerable.

LTS Rail actively encourages customer comments by making pre-printed forms widely available at stations, especially at times of severe disruption. The percentage of complaints on these pre-printed forms has increased significantly from 26 % (Pro rata based on data for four periods.) in 1997-98 to 68 % in 1998-9.

### ***Merseyrail Electrics***

The majority of complaints received by Merseyrail Electrics Limited relate to train service performance.

Over the past year we have frequently met and sometimes surpassed the targets which we aim for under the Merseyrail Passengers’ Charter. This has led to a reduction in complaints referring specifically to train service performance and in the overall level of written correspondence from 5,042 in 1997–98 to 4,286 in 1998–99.

We are able to answer 99.7% of written correspondence within our complaints handling target of 20 days and, over the course of the year, our average response time was 4.3 days.

To enable us to carry out further improvements in the way we handle complaints we have recently installed an improved computer system in our office.

### ***Midland MainLine***

During the last year Midland MainLine has achieved a drop in the rate of complaints received. As the number of passenger journeys has increased in 1998–99 there has been an overall reduction in complaints per 100,000 journeys. Over 50% of the complaints received in 1998–99 related to train performance issues. During the autumn of 1998 a number of factors contributed to disappointing punctuality levels and resulted in a relatively high number of complaints during periods seven to nine. During the rest of the year the level of complaints per period remained relatively stable.

There has been an improvement in the percentage of cases closed within target; 90% of cases were closed within 20 working days. The average response time for the year overall was nine days and Midland MainLine will be working hard to improve response times even further during the coming year.

Customer comments are regarded as vital when considering future developments of the service and a concerted effort has been made to encourage feedback. The Midland MainLine Customer Relations local rate number now has extended opening hours and more

phone lines meaning that customers have greater opportunities to comment on Midland MainLine services.

### ***Northern Spirit***

Over 43,674,000 million passengers travelled with Northern Spirit between April 1998 and March 1999 – and of those the number of people who complained amounted to 0.047% of that figure.

At Northern Spirit we continue to work hard to provide our customers with a reliable, punctual and quality service. Our efforts over the last year have certainly resulted in a significant reduction in comments received compared with 1997–98, down more than 5,703 compared to the same time last year. It represents a fall in complaints of over 25%.

Whilst we are determined to provide all of our customers with enjoyable, hassle-free journeys occasional problems do occur. We recognise that customer service must constantly be of the highest order and on the rare occasions that there is a problem we know that the skills of our staff must be applied in dealing with the situation. We have now started a training and development programme and reinforced this by further improving the customer feedback. We are supporting all of our front line staff and trying to sort out problems before they happen dealing with any difficulties immediately.

Our customer communications team based in Leeds, led by Business Communications Manager Simon Taylor, has also been instrumental in bringing about changes in terms of customer service delivery. Response times to letters have been reduced by a significant amount (average response time between April and March 1998–99 is 5.1 days compared with 8.49 for 1997–98) and yet they have widely publicised the communications centre as the place to send letters or telephone comments. A photograph featuring the team this year has also appeared on engineering posters and timetables to show the help available. They have

also sent thousands of letters to customers in the aftermath of service disruption at a number of key locations (within hours of a problem occurring).

The team recognises one of its biggest contributions is ensuring that lessons are learned across the business. To that end they provide a detailed monthly report to all of the General Managers so that they and their teams can work to prevent the same problems from happening again.

Simon's efforts were recognised recently when he received a runner-up prize in the 'Rail Professional Rail Business Manager of the Year' awards. Northern Spirit nominated him because of his achievements in establishing a high-tech communications department and the sweeping reforms which saw him take this important area of business into a new dimension.

The communications team continues to analyse how it approaches the issue of customer complaints and is committed to providing our customers with the highest possible level of service. On its recommendation the Passengers' Charter has been changed and the levels of compensation have been increased for a delay of one hour or more from 20% to 50% with the higher figure often exceeded depending on the circumstances. Northern Spirit has reduced the target response time where investigation is required for a full reply, from one month to 15 days, a target being comfortably beaten.

### ***Silverlink Train Services***

Silverlink Train Services is a customer-focused company whose vision and purpose is to provide a value-for-money train service and to be continually held in high regard by its customers and staff.

Since the last Train Operating Company complaint statistics report was published the number of written complaints has over the last couple of months decreased. The issues causing the complaints are unchanged and this improvement has been achieved

through working in close partnership with Railtrack and other train operators to improve the situation.

When responding to a comment the company's policy is that a truthful and informed reply be given to our customers. Also initiatives to improve overall communication within the company are being implemented. Approximately three times a year all managers go to our stations to meet our customers and talk to them about a variety of issues.

Technological investment has been made in the customer relations department to give customers a more professional and efficient response to their telephone calls and written comments.

### **South West Trains**

After a good start to the year we had hoped that 1998 would see a reduction in customer complaint figures. However a series of severe infrastructure problems in the latter part of the year combined with a continuing substantial growth in passenger numbers resulted in us ending the year marginally up on last year's figures.

Overall last year we saw the total number of passenger journeys rise by 3.97% to a massive 122,852,000, with passenger miles rising by 5.75% to 2,291,580,000.

We are happy, however, that despite this slight increase we have been able to improve on our response rates for 1997-98. answering 91% of complaints within our own target response time of 10 working days, and 98% within 20 working days.

The facility to e-mail complaints through the South West Trains' website, which was set up last December, has provided passengers with another communications channel and it should be noted that the number of complaints registered in this way and through the increased number of pre-printed complaint forms received shows it has never been easier to make your views known to South West Trains.

### **Thameslink**

Thameslink considers that answering customer comments and complaints is one of the key ingredients of its customer service. Feedback is of vital importance to our business planning and as such we encourage our customers to speak to us.

Overall, communications have increased when compared to the previous year although in the many periods when performance has been excellent the number has dropped. The periods with huge increases corresponded to performance problems in the autumn and following the particularly excellent performance between May and September 1998.

In recent periods we have recovered from volumes of letters received during periods of poor performance and have been able to deal with most matters on the same day.

The other factors for this increase are:

- the increase in the number of passenger journeys, up by 10% on last year.
- easier and more convenient ways for customers to contact us.
- more publicity informing and encouraging customers to provide feedback.

### **Valley Lines**

The level of customer complaints has increased year on year as a consequence of a series of one off incidents that have had a significant impact on train service performance. There have been three derailments or collisions either on or affecting train services on the network and two major incidences of engineering work. The weather during the spring and autumn of 1998 was extremely wet and caused severe flooding affecting large parts of the network. All of these incidents were out of the company's direct control.

Rapid growth in the level of rail travel in general caused a shortage of qualified drivers that resulted in disruption to services during the summer and autumn of 1998.

The monitoring and analysis of customer complaints provides crucial information on what customers regard as important and in all cases this information is used to assist in prioritising improvements and ensuring that management action is directed to the appropriate areas.

### ***Virgin Trains***

We welcome comments from our customers about our services and actively invite feedback through publishing our address in our on-train magazine, in our timetables, on the internet and in other publicity. It is also displayed in notices posted in each of our coaches.

In December 1998, at the time that we introduced our revised Passenger Charters, we simplified our freepost customer comments forms. These postage pre-paid forms make up over 50% of all correspondence received.

In spite of the ease with which customers can now get in touch with us, we continue to receive letters or comment forms from fewer than 1% of our customers (based on journeys).

One of our key customer service priorities is to constantly improve the quality and speed of our response to correspondence. To help us achieve this, and to increase the efficiency of the service we provide, in September 1998 we installed an upgraded computer system for handling customer correspondence at a cost of £350,000.

### ***Wales & West Passenger Trains***

Earlier in the year we experienced driver shortages and several incidents involving infrastructure problems. More recently Wales & West's reliability has been

progressively increasing with the introduction of better software and an increase of staff within Customer Services. We are currently answering 97.5% of all our customers' letters within 10 working days.

Wales & West will continue to enhance its Customer Service obligations and show our demanding customers that we can exceed their expectations by going further.

## IF YOU HAVE A COMPLAINT

If you have a complaint about any aspect of the service provided on the national rail network, either on trains or at stations you should firstly contact the train operator providing the service about which you wish to complain. If you are unsure about which train operator you should complain to, you can register your complaint with any operator who will pass your complaint to the correct place. Details of train operators' names, addresses and telephone numbers are shown on posters at stations and on trains and are also listed in the telephone directory. Telephone numbers for the train operators are shown below.

Train Operator	Customer Relations Department Tel. No.
Anglia	01473 693333
Cardiff Railways	01222 449844
Central Trains	0121 654 3833
Chiltern Lines	01296 332114
Connex South Central/ Connex South Eastern	0870 603 0405
Gatwick Express	0171 922 9696
Great Eastern	0645 505000
Great North Eastern Railway	0845 722 5333
Great Western	01793 499458
Island Line	01983 408585
LTS	01702 357889
Merseyrail	0151 702 2071
Midland Main Line	0345 221 125
Northern Spirit	0870 602 3322
North Western Trains	0161 228 4696
ScotRail	0141 335 4612
Silverlink	01923 207258
South West Trains	0171 620 5620
Thameslink	0171 620 6333
Thames Trains	0118 908 3678
Virgin Trains	0121 654 7400
Wales & West	01222 430090
West Anglia Great Northern	0345 818919

If you are unhappy with the response that you receive from a train operator, you should contact your local Rail Users Consultative Committee which may be able to help you. These Committees are independent of the train operators and were set up under the Railways Act 1993 to protect the interests of the users of Britain's railway network. Telephone numbers for the Committees are listed below.

Name of Rail Users Consultative Committee (RUCC)	Tel. No.
RUCC for Scotland	0141 221 7760
RUCC for Wales	01222 227247
RUCC for North Western England	0161 228 6247
RUCC for North Eastern England	01904 625615
RUCC for the Midlands	0121 212 2133
RUCC for Eastern England	01733 312188
RUCC for Western England	0117 926 5703
RUCC for Southern England	0171 222 0391
London Regional Passengers Committee	0171 505 9000

***Contact points for further information***

All press enquiries to the ORR  
0171 282 2002/2082

All requests for further copies of the report to  
the ORR library on 0171 282 2001

All other enquiries about this bulletin to Stuart  
White on 0171 282 2000