



# Passenger Rail Service Complaints: Quality and Methodology Report

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# Introduction

This is a report on the quality of the ORR passenger rail service complaints statistics. This helps us to understand the quality of our statistics, and also ensures ORR is compliant with principle 4 of the Code of Practice for Official Statistics<sup>1</sup>.

The quality report covers the following areas

- **Methodology** – detail on the various data sources and methodology used to compile the statistics
- **Historic background** – a background to each statistic and detail of changes throughout the time series
- **Relevance of the data** – the users of the statistics, and user-engagement we have done
- **Accuracy and reliability** – the accuracy of each statistic
- **Timeliness and punctuality** – our timelines for the production, quality assurance and publication of each statistic
- **Accessibility and clarity** – the format of our statistics and where they can be found
- **Coherence and comparability** – comparisons to similar statistics published elsewhere

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<sup>1</sup> Principle 4: Sound methods and assured quality. Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices. The Code of Practice can be accessed here <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

## Methodology

The passenger rail service complaints statistical release uses three metrics to assess dissatisfaction by passengers with passenger rail services in Great Britain:

- Complaints – any expression of dissatisfaction by a customer or potential customer about service delivery or about company or industry policy.
- Appeals – complaint appeals taken up and closed by the independent passenger watchdogs, Transport Focus or London TravelWatch, on behalf of passengers whose initial complaint to the train operating company was not resolved to their satisfaction.
- National Rail Enquiries (NRE) – a telephone enquiry service that provides information primarily on train times and fares. .

## Complaints

Train operating companies record complaints made by letter, e-mail/ webform, telephone, meet the manager events and online forums. The operators report to the ORR on a periodic basis the number of complaint related correspondences they have closed and also the complaint categories these correspondences relate to<sup>2</sup>. Both datasets are disaggregated by the type of contact method used to make the complaint. Operators also provide the percentage of complaints responded to within 10 and 20 working days, and within a defined internal target. These datasets are used by the ORR to calculate complaints rate, proportion of complaints relating to each category, the percentage share of contact methods and the percentage of complaints responded to within 20 working days.

ORR provides train operators with a template to fill in each period and also guidance on how to correctly complete the template. These are sent directly to operators and can also be found on the ORR website (<http://orr.gov.uk/statistics/published-stats/complaints-data>).

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<sup>2</sup> Delay repay is not included within the complaints data; data on compensation paid to passengers for delayed journeys is available from the [Department for Transport](#)

## Complaints rate

The complaints rate is calculated from the total number of complaint correspondences handled by each operator, i.e. the sum of all the correspondences made by the different contact methods. For the statistical release the periodic data are apportioned into quarters (see below). In order to provide a meaningful comparison between operators the number of complaints are normalised by the number of passenger journeys for the quarter<sup>3</sup>. The complaints rate is presented as the number of complaints per 100,000 journeys.

$$\text{Complaints rate} = \left( \frac{\text{Number of complaint correspondences}}{\text{Number of passenger journey}} \right) \times 100,000$$

## Complaints by category

The ORR provides a template to train operators consisting of 65 complaint categories; these categories are based on the 33 National Rail Passenger Survey (NRPS) categories used to measure passenger satisfaction in addition to other categories where extra disaggregation is needed. For example in 2015-16 extra categories for accessibility issues and complaints handling were added as part of the ORR's monitoring of Complaints Handling Procedures (CHPs) and Disabled People's Protection Policies (DPPPs) and in 2016-17 further categories were added to monitor the volume of complaints received regarding delay compensation schemes.

For each complaint correspondence handled operators record the nature of the complaint(s) against the categories in the template provided by the ORR. Where there are multiple causes for complaint covered in a correspondence each of these topics would be recorded against the different categories. Therefore the total number of complaint categories will be greater than or equal to the number of complaint correspondences. The periodic data provided by operators are apportioned into quarters (see below) and are presented as the percentage of complaints in each category in order to allow comparisons between operators.

## Praise rate

For 2016-17 ORR introduced a new metric showing the praise rate for each operator. This shows the volume of praise comments received by each operator, and is normalised in the same way as the complaints rate, with the measure presented as the number of praise comments per 100,000 journeys.

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<sup>3</sup> Passenger journeys are extracted from LENNON, the rail industry's ticketing and revenue database, and supplemented with data that is provided by train operators on journeys that have been sold outside the LENNON system. Quarterly journey figures by operator are available on the [Data Portal](#). For more information on the calculation of the passenger journey figures please see the [Passenger Rail Usage Quality Report](#).

## Complaints correspondence by contact method

The complaint correspondence data discussed above is supplied to the ORR split by contact method type. This data is used to calculate the proportion of complaints received by each contact method. This measure shows the relative frequency with which complaints are received by the different contact methods, and does not take into account the number of complaint topics covered within each correspondence. This is a change in methodology for the 2016-17 statistical releases; previous publications had used the complaint category data to calculate this metric.

## Complaints responded to within 20 working days

For each period train operators provide the ORR with the percentage of complaint correspondences they have handled within 20 working days. In order to classify as a full response each complaint category within the correspondence needs to have been addressed. To calculate a quarterly response rate, the response percentages and the number of complaints are multiplied out to produce the number of correspondences responded to within 20 working days. These are then apportioned into quarters (see below) and then converted to a percentage response rate for the quarter.

	P1	P2	P3	P4
Total complaints	20	30	25	4
% responded to within 20 working days	50%	80%	60%	75%

↓

	P1	P2	P3	P4
Complaints responded to within 20 working days	10	24	15	3

↓

	Q1
Total complaints	79
Complaints responded to within 20 working days	52
% responded to within 20 working days	<b>65.8%</b> (52/79)

## Appeals closed

Transport Focus and London TravelWatch provide the ORR with the number of appeals they have closed on behalf of passengers, and the complaint categories to which the appeals relate. Appeals are typically opened when passengers' initial complaint to a train operator has not been resolved to their satisfaction. Operators will direct passengers to the relevant watchdog if they provide a second substantive response to an initial complaint. Similarly to complaint correspondences / complaint categories reported to ORR by the TOCs, the number of appeal complaint categories should always be equal to or higher than the number of appeals closed as one appeal can detail more than one appeal complaint category. Appeals data are presented in the statistical release by train operating company and complaint category.

The number of appeals closed and appeal complaint comments for Transport Focus and London TravelWatch provide a key indicator of the quality of response passengers received from train operating companies when making their initial complaint, as well as the types of complaint which do not receive adequate initial responses.

## Passenger satisfaction with complaints handling

After a passenger makes a complaint to a train operator, they are invited to participate in a follow up survey by an independent research company, commissioned by ORR, about their experience of how the complaint was handled.

The survey asks questions relating to the complaints process and resulting outcome. The complainant is asked to rank their satisfaction with each on a five point scale or, in some instances, to provide a qualitative response via an open text box.

This data allows ORR to monitor its licensees' compliance with the Complaints Handling Procedures (CHP). It also improves the transparency of passengers' experiences and allows ORR to monitor industry performance over time

The survey started during October 2015. Train operators joined the survey at different points since the survey started (see table below). Comparisons made in 2017-18 to the previous year should be treated with caution since the number of TOCs participating in the survey grew during 2016-17.

<b>TOC</b>	<b>Date the TOC joined the survey</b>
Arriva Trains Wales	2016-17 Period 7
c2c	2016-17 Period 3
Caledonian Sleeper	2017-18 Period 3
Chiltern Railways	2016-17 Period 6
CrossCountry	2015-16 Period 8
East Midlands Trains	2015-16 Period 8
Govia Thameslink Railway	2016-17 Period 10
Grand Central	2015-16 Period 8
Great Western Railway	2016-17 Period 7
Greater Anglia	2015-16 Period 11
Heathrow Express	2017-18 Period 1
Hull Trains	2015-16 Period 13
London Midland	2015-16 Period 13
London Overground	2015-16 Period 9 to 2016-17 Period 8
Merseyrail	2015-16 Period 9
Northern	2015-16 Period 8
ScotRail	2016-17 Period 1
South West Trains	2016-17 Period 4
Southeastern	2016-17 Period 7
TransPennine Express	2016-17 Period 7
Virgin Trains East Coast	2015-16 Period 9

## National Rail Enquiries (NRE) data

NRE, part of the Association of Train Operating Companies (ATOC), provides information for all passenger rail services on the National Rail network in England, Wales and Scotland. Enquiries to NRE can be made through numerous different channels including telephone and self-service channels such as the NRE website. The National Rail Enquiry Service (NRES) is a telephone enquiry service that provides information primarily on train times and fares. The data presented in the passenger rail service complaints statistical release relates to enquiries made through the NRE telephone service only.

NRES is regulated by DfT and its minimum performance standards are set out in the NRES Agreement. The agreement is for 93% of all calls in a financial year to be answered, and for no less than 90% of all calls in any four-week railway period to be answered. It also introduces a formal quality regime, which includes monitoring through mystery shopping surveys. NRES is always susceptible to volatile demand. Some aspects affecting demand can be predicted, such as time of day or sporting events, whereas others are very hard to predict, for example, weather.

The data are collected at a daily level and provided to ORR after the end of each railway period by ATOC. The quarterly data are calculated by summing the data for the relevant dates for each quarter, e.g. 1 April to 30 June for Q1 (apportionment is not required here as the data is provided at a daily level). National Rail Enquiries telephone service data are presented as the volume of calls received and the response rate.

## Quarterly and periodic data

The rail industry reports figures in railway periods, rather than calendar months for example. Some daily and quarterly datasets require apportionment of these data.

The standard method for apportionment is based on the number of days within the period that fall into the relevant quarter. For example, the dates in period 4 cover both Q1 and Q2. When the quarterly data are calculated for 2016-17, 5/28 of the data are assigned to Q1 (covering 26 June to 30 June) and 23/28 of the data are assigned to Q2 (covering 1 July to 23 July). The breakdown of the calculations used for 2016-17 are as follows:

Quarter	Calculation
2017-18 Quarter 1	Period 1 + Period 2 + Period 3 + 6/28 of Period 4
2017-18 Quarter 2	22/28 of Period 4 + Period 5 + Period 6 + 14/28 of Period 7
2017-18 Quarter 3	14/28 of Period 7 + Period 8 + Period 9 + 22/28 of Period 10
2017-18 Quarter 4	6/28 of Period 10 + Period 11 + Period 12 + Period 13



# Historical background

## Complaints data

Prior to 2010, the Department for Transport (DfT) was responsible for collecting complaints data from each of the franchised train operating companies before supplying the information to ORR. Following an agreement with DfT, we took responsibility for collecting the complaints data directly from the train operating companies. Some of the benefits of the change in process were:

- We received the data on a more frequent basis so were able to carry out more quality assurance on the data;
- We were able to identify any data quality issues earlier in the process and liaise directly with train operating companies (TOCs) to clarify these rather than contact them through DfT;
- We provided TOCs with guidelines on how complaints data should be collected and processed, ensuring any methodological inconsistencies between TOCs were addressed;
- We were aware of any delays in the data supply chain and could contact TOCs directly to ensure data would be delivered and there would be no delay to the publication of the National Statistics.

For further information on the transfer of responsibility, please see the project initiation document (PID) <http://orr.gov.uk/statistics/published-stats/complaints-data/background>.

Since the transfer we have been undertaking work to improve the quality of complaints statistics we publish. We are actively working with the TOCs to achieve this through workshops with the data providers and visits to TOCs to get a better understanding of their systems and processes.

In 2011 we were asked to publish more disaggregated complaints data by the Prime Minister in his letter on transparency and open data (<https://www.gov.uk/government/news/letter-to-cabinet-ministers-on-transparency-and-open-data>).

As part of this process, from 1 April 2013, the list of complaint categories was extended to align with the Transport Focus National Rail Passenger Survey (NRPS) categories, helping to create a consistent industry wide set of complaints categories which will allow users of the statistics to directly track complaints data with NRPS satisfaction scores. We engaged with the train operating companies to ensure their full support for these changes and are continuing to work with them to improve the quality and comparability of the complaints data.

Further details on the complaints data and the alignment to the NRPS categories can be accessed on the ORR website <http://orr.gov.uk/statistics/published-stats/complaints-data>.

For 2015-16 the complaint categories for accessibility issues and complaints handling were disaggregated into a number of more detailed categories so that complaints regarding specific issues such as the speed of response time to complaints and the lack of facilities for disabled people could be monitored. This was part of wider work being undertaken by ORR to monitor the compliance by train operating companies with Complaints Handling Procedures (CHPs)<sup>4</sup> and Disabled People's Protection Policies (DPPPs)<sup>5</sup>.

We have published data on the proportion of complaints responded to within 20 working days since 2007-08 quarter 4. This is the industry target for providing a response to the customer's complaint. However, some train operating companies have their own internal targets for response time, which are equal to or less than 20 working days. From 2015-16 quarter 1 we have collected data on the percentage of complaints responded to within 10 working days and the percentage responded to within target as part of the CHP and DPPP monitoring. This data is available on the data portal in [Table 14.2](#).

During 2015-16 ORR visited the customer relationship departments at various train operators to learn more about how complaints are handled and gain a better understanding of how the use of different customer relationship management (CRM) systems affects operators' ability to correctly complete the ORR complaints data template. These visits were followed by a workshop run by the ORR in March 2016 which was attended by the majority of operators. This workshop covered a number of different areas regarding how complaints are handled and reported, and gave the operators opportunity to discuss any inconsistency in the way they report complaints to ORR. As a result of this workshop a number of improvements to methodology were agreed, along with some new indicators to be collected for the first time during 2016-17.

For 2016-17 all operators agreed to report complaints based on complaints closed within a period. For the 2016-17 data collection new data collection template was distributed by the ORR, alongside updated guidance on the methodology. In addition to increased data collection on complaints relating to delay compensation and the percentage of complaints responded to for the different contact methods, the guidance focused on improvements to the consistency of reporting between the operators. This included ensuring that praise related communications were not included in the complaint correspondence data (which had the effect of inflating the complaints rate for some operators) and emphasizing that where possible complaints should be recorded in accordance with

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<sup>4</sup> CHP <http://orr.gov.uk/what-and-how-we-regulate/licensing/licensing-railway-operators/licence-obligations/complaints-handling-procedures>

<sup>5</sup> DPPP <http://orr.gov.uk/what-and-how-we-regulate/licensing/licensing-railway-operators/licence-obligations/disabled-peoples-protection-policy>

the guidance so that if a correspondence contained multiple complaint categories, these should all be recorded and reported to ORR. Consequently we consider there to be a series break at the start of 2016-17 where the data reported is not directly comparable to previous years. However these improvements to the methodology have allowed us to confidently introduce new reporting metrics (e.g. praise rate) to the statistical release. Further detail on the effect of these changes on the statistics is provided in Annex 3 of the main statistical release, which is repeated below.

### **Appeals closed data**

London TravelWatch<sup>6</sup> and Transport Focus<sup>7</sup> play vital roles in championing passenger rights within the rail industry in Great Britain. Transport Focus is the independent transport user watchdog, which includes representing Britain's rail passengers (outside London). Transport Focus use their knowledge to influence decisions on behalf of passengers, working with the industry, passenger groups and national and local governments to secure journey improvements. London TravelWatch is the independent, statutory watchdog for transport users in and around London<sup>8</sup>. Speaking for all London transport users, including rail, London TravelWatch look into complaints from people unhappy with the response they have received from their transport provider.

Transport Focus and London TravelWatch may open an appeal on behalf of a rail passenger whose initial complaint to the train operating company has not been resolved to their satisfaction. Transport Focus and London TravelWatch do not take up all appeal cases they receive.

We previously discontinued publishing appeals opened data due to methodology differences between Transport Focus and London TravelWatch. However, we have been working with both organisations to improve the quality and comparability of their appeals data and we are now able to present data on the number of appeals closed for each train operating company (franchised, non-franchised and Network Rail) and the complaint categories for appeals closed by both Transport Focus and London TravelWatch. For Transport Focus historic data is available from the start of 2013-14, whereas for London TravelWatch data is presented from 2015-16 Q1 onwards.

### **National Rail Enquiries (NRE) data**

Since 2012-13 quarter 2 figures for self-service channels and mystery shoppers have been removed from ORR publications as ATOC no longer supplies ORR with this data.

More information on NRES can be found on their website: <http://www.nationalrail.co.uk/about/>.

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<sup>6</sup> London TravelWatch <http://www.londontravelwatch.org.uk/home/>

<sup>7</sup> Transport Focus <http://www.transportfocus.org.uk/>

<sup>8</sup> Map of area covered [http://www.londontravelwatch.org.uk/about/london\\_travelwatch\\_area](http://www.londontravelwatch.org.uk/about/london_travelwatch_area)

## Effect of methodology changes

*(this section is also presented as annex 3 of the statistical release)*

In 2016-17 ORR introduced some improvements to the way it which collects complaints data from the train operators. Because of this the methodologies for how a number of the metrics in this statistical release are calculated have been updated. In this annex the effect of these changes are discussed, and where possible measured by comparing the old and new methodology. For further information on the changes to data collection for this year please see the [Quality Report](#).

### Complaints rate

Train operators report the complaints data to ORR after each railway period (every 28 days). In general there are two ways by which this can be done:

1. Complaints received: i.e. complaints received by the operators within a period and handled either within that period or at a later date
2. Complaints closed: i.e. complaints fully closed by the operators within a period, which were received either earlier in that period or in previous periods

Prior to 2016-17 there was a mix of the two different reporting methods across the different operators, partly because of differing internal reporting needs by the operators and partly because of lack of clarity in the guidance provided by ORR. For 2016-17 all operators agreed to provide data based on the complaints closed methodology<sup>9,10</sup>.

Over long time periods (particularly quarterly and annually), this change is unlikely to have any substantial impact on the complaints rate, as ultimately the same number of complaints would be received and closed, and therefore recorded by each method. The most likely impact is the introduction of a time lag in reporting of complaints. For example, if a TOC received a large number of complaints in January, but didn't close the majority of these until March, these would be reported in the March data rather than January. However, with the aggregation to quarterly and then annual data the impact of this should be minimised.

There is a chance that for those operators who changed methodology some complaints could have been double counted in our statistics. For example a complaint received in March and recorded under complaints opened (and thus recorded under 2015-16 Q4) and closed in April (and thus recorded under 2016-17 Q1). However, because the TOCs implemented this change at the start of the year, there should be no double counting within the 2016-17 Q1 results.

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<sup>9</sup> This method was chosen as it was favoured by the majority of TOCs and the most commonly used in previous years

<sup>10</sup> Merseyrail were unable to implement this change until after 2016-17 Q1. Therefore there will be a slight discontinuity in the data for that operator for this year.

A further refinement to the data collection guidance for 2016-17 was emphasizing that praise related communications should not be counted under the complaint statistics. Previously some TOCs had included these communications, which would have inflated the complaints rate.

It is difficult to quantify the number of praise comments included previously in complaints statistics because ORR does not receive the number of unique praise correspondence. Therefore we cannot quantify the effect of this methodology change. However, for those operators for which praise communications were being included in the complaints rate, the removal of praise would lead to a reduction in the complaints rate.

### Complaints by category

For 2016-17 praise has been removed as a category within the complaints by category tables. This is due to the introduction of a new praise rate table (see below) and methodology change described above which ensures praise is not counted as a complaint.

The impact of this is to increase the percentage share of every other complaint category because praise is now excluded. The table below presents the 2016-17 Q1 data using both the old and new methodology. The table below shows the percentage point change for the top 10 complaints categories following the removal of praise. The relative difference between the complaint categories remains unchanged between the different methods.

Complaint category (top 10)	Previous methodology (with praise included)	2016-17 methodology (without praise)	Percentage point increase per category
Punctuality/reliability (i.e. the train arriving/departing on time)	24.1%	25.6%	1.5pp
Facilities on board	7.8%	8.3%	0.5pp
Ticket buying facilities - other	6.9%	7.3%	0.4pp
Sufficient room for all passengers to sit/stand	6.5%	6.9%	0.4pp
Ticketing and refunds policy	6.3%	6.7%	0.4pp
Ticket buying facilities	6.1%	6.4%	0.4pp
<b>Praise</b>	<b>6.1%</b>	-	-
The attitudes and helpfulness of the staff at station	3.5%	3.7%	0.2pp
Other policy	2.9%	3.1%	0.2pp
The helpfulness and attitude of staff on train	2.7%	2.9%	0.2pp
Provision of information about train times/platforms	1.8%	1.9%	0.1pp

The general effect of the methodology changed described above is consistent for all TOCs, however the size of the increase in percentage share varies between operators depending on the volume of praise they receive.

### Praise rate

Following the removal of the praise comments from the two measures discussed above, ORR has introduced a new metric of praise rate. This is calculated using a similar methodology for the

complaints rate. Praise is normalised by per 100,000 passenger journeys. This provides a praise rate metric that is comparable between operators. This metric has been back calculated to the start of 2015-16 in order to provide a short time-series. This can be found on the data portal in Praise rate by TOC - [Table 14.17](#).

### Complaints by contact method

Prior to 2016-17 complaints by contact method was calculated using complaints category data. In this each topic covered in a communication would be assigned as a single complaint by that contact method.

For 2016-17 we have adjusted the methodology for this to use complaint correspondence data; i.e. each communication (e.g. letter, email) is counted only once, regardless of the number of topics covered. This change was implemented because it is considered that this is a more accurate representation of the frequency by which operators are contacted by the different methods. Under the previous method results were skewed by those contact types more likely to include multiple complaint categories.

The table below shows the 2016-17 Q1 national data using both methodologies. The new methodology slightly increases the percentage share of telephone complaints, while reducing the share for email/webform and letter. Emails and letters are the types of communication that are more likely to include multiple topics of complaint, hence why their share reduces after the methodology change.

	Email/Webform	Letter	Meet the Manager	Online Forums	Telephone
<b>2016-17 methodology</b>	63.6%	16.9%	0.0%	1.0%	18.5%
<b>Previous methodology</b>	64.8%	17.1%	0.0%	0.9%	17.2%

### Complaints responded to within 20 working days

As discussed above, ORR has taken measures to ensure that praise related communications are not included within the complaints rate data for 2016-17. This may have a slight effect on the complaints responded to within 20 working days statistics. However we cannot quantify the effect of this as we do not know how praise communications were being considered responded to in the previous data. However the effect is likely to be minimal as relatively few praise comments are received compared to complaints (in 2016-17 Q1 there was approximately one praise comment for every 16 complaint comments).

## Relevance

*The degree to which the statistical product meets the user in both coverage and content.*

Complaints and appeals data are key measures of service satisfaction and aligning this data to the NRPS categories creates a consistent industry-wide set of complaints categories which will allow users of the statistics to directly track complaints data with NRPS satisfaction scores.

Complaints data published on our data portal are used by a range of individuals for planning, analysis, decision making and data validation.

More detailed information on users of ORR statistics and meeting the needs of users is available on our [user engagement webpage](#).

## Accuracy and reliability

### *The proximity between an estimate and the unknown true value.*

Complaints data are supplied by the train operating companies, appeals data are supplied by Transport Focus and London TravelWatch and NRE telephone service data are supplied by Association of Train Operating Companies (ATOC). These data are stored in a secure data warehouse maintained by ORR. The data supplied are subject to an extensive quality assurance process, including a suite of validation checks to ensure the data meets the required specification and is in line with previous trends. Any arising issues are flagged with the data suppliers who must confirm the anomalies or correct the data and re-submit.

Explanations from the data suppliers regarding data anomalies are included within our commentary to explain the data and trends.

The data are then prepared for publication. The process includes quality assuring the tables and charts produced and providing supporting commentary regarding the key trends, methodology and quality measures. These reports are subject to peer review.

The final stage of the quality assurance process is a sign off by the statistics Head of Profession confirming the data meets the quality standards and are fit for publication.

### Complaints data

The recording of complaints data is not generic across all of the train operating companies. Each train operator has their own customer relationship management (CRM) system to log and update complaints received. Therefore, the categorisation of complaints may differ slightly in some instances. Furthermore, each train operator will provide their staff with their own internal training, which may differ between operators. To help overcome any issues around the categorisation and comparability of complaints data across the train operators, we have produced guidance regarding the scope and categorisation of complaints. In addition to this we produced a mapping document to improve consistency in complaints categorisation<sup>11</sup>.

During the year, train operators may review their complaints practices to ensure consistency in categorisation and outcomes/resolutions. Based on this, the complaints data can be subject to revisions. In such instances, the train operator provides refreshed data as soon as possible.

In the statistical release we calculate the complaints rate from the number of the communications received, whilst the complaints by category data is calculated from the total number of topics

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<sup>11</sup> <http://orr.gov.uk/statistics/published-stats/complaints-data>



covered in the communications. Prior to 2016-17 we had identified a small number of operators who were not correctly recording against multiple complaints categories if a communication covered more than one topic. The reason for this was most often due to limitations with the various CRM systems used by operators. As a result of methodology improvements in 2016-17 all operators now report complaints in accordance with the guidelines. For those operators that altered their practices in 2016-17 to meet the guidance the data presented in the statistical release is not directly comparable to previous years. Those operators known to have made methodology changes to address this issue are Chiltern, London Overground, Southeastern and TfL Rail.

Claims for delay repay (or any other compensation scheme) are not included within the complaints statistics. However if a complaint is made at the same time as the claim this will be counted. The mechanism for processing a compensation claim varies between TOCs, even those on the same compensation arrangements. This may affect the likelihood of making a complaint alongside the claim. The current compensation arrangements in place for the different operators are:

- Delay repay:
  - Greater Anglia
  - Chiltern Railways
  - London Midland
  - CrossCountry
  - East Midlands Trains
  - Virgin Trains East Coast
  - Govia Thameslink Railway
  - Southeastern
  - Virgin Trains West Coast
  - c2c
  - ScotRail
  - TransPennine Express
  - Northern Rail
- Traditional (passenger charter) arrangements
  - Arriva Trains Wales,
  - Great Western Railway
  - South West Trains
- Other arrangements
  - London Overground
  - Merseyrail
  - TfL Rail
  - Grand Central
  - Heathrow Express
  - Hull Trains

## Appeals closed data

Appeals closed data provided by Transport Focus and London TravelWatch may also be subject to similar issues regarding the CRM system and staff training. We are working with these data suppliers to improve the consistency and comparability of the data.

## Timeliness and punctuality

*Timeliness refers to the time gap between publication and the reference period. Punctuality refers to the gap between planned and actual publication dates.*

Quarterly complaints and appeals data are, on average, published 82 days after the quarter ends.

ORR has memorandums of understanding (MoUs) with the train operating companies, Transport Focus, London TravelWatch and ATOC. This ensures consistent and timely data are received each period. The MoUs are reviewed on an annual basis. More detailed information on timeliness and effectiveness of the statistical output is available on our [user engagement webpage](#).

## Accessibility and clarity

***Accessibility is the ease with which users are able to access the data, also reflecting the format in which the data are available and the availability of supporting information. Clarity refers to the quality and sufficiency of the metadata, illustrations and accompanying advice.***

All data tables can be accessed on the [Data Portal](#) free of charge.

***The procedures and policy used to ensure sound confidentiality, security and transparent practices.***

ORR is fully compliant with the Statistics and Registration Service Act 2008 and principle 4 of the Code of Practice for Official Statistics.

More information is available on our [user engagement webpage](#).

## Coherence and comparability

*Coherence is the degree to which data that are derived from different sources or methods, but refer to the same topic, are similar. Comparability is the degree to which data can be compared over time and domain.*

We publish complaints data normalised by passenger journeys. As some TOCs carry more passengers than others, we present the data as a rate per 100,000 passenger journeys. Unlike other system-based measures, the number of complaints reflects direct feedback from passengers. Used in conjunction with other performance measures, such as the PPM, a more comprehensive description of rail industry service and passenger satisfaction can be reported. This is a superior measure to a ratio against passenger kilometres as, no matter how long the trip, a dissatisfied customer is likely to only initiate a single complaint correspondence.

From 2013-14 quarter 1 we began publishing more disaggregated complaints data by contact method. A total of five contact methods are recorded, including email/webform, telephone and meet the manager. These complaints by source categories are not comparable to data prior to 2012-13, which are based on only three contact methods - letter, pre-printed form and telephone.

Complaints submitted via social media, such as Twitter and Facebook, are not currently included within the complaints statistics. The number of complaints received via such sources, the definition of a 'complaint' and the resources that each train operator allocates to these social media mediums varies significantly, and therefore they are excluded from the published figures. In March 2015 ORR published a report<sup>12</sup> on the increasing use of social media amongst passengers and the challenges in capturing complaints.

Transport Focus publishes complaints data on their website through their own data tool. These can be accessed through <http://data.transportfocus.org.uk/train/complaints/tocs/>

The Rail Delivery Group (RDG) publishes key transparency indicators<sup>13</sup> for each TOC, for which there are complaints data available for selected operators.

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<sup>12</sup> ORR report: [Social media - How to tweet your customers' right](#)

<sup>13</sup> <http://www.raildeliverygroup.com/about-us/transparency.html>

## Length of Comparable Time Series

Measure	Time Series	Data Portal Table
<b>Active Time Series</b>		
Complaints rate Quarterly Annual	1997-98 Q3 1998-99	<a href="#">Table 14.8</a>
Complaints rate by TOC Quarterly Annual	2007-08 Q4 2007-08	<a href="#">Table 14.9</a>
Complaints by category Quarterly Annual	2007-08 Q4 2007-08	<a href="#">Table 14.3</a>
Complaints by category and TOC Quarterly Annual	2010-11 Q1 2007-08	<a href="#">Table 14.5</a>
Praise rate Quarterly <i>(this is a new table for 2016-17 Q1)</i>	2015-16 Q1	<a href="#">Table 14.17</a>
Complaints by contact method Quarterly Annual	2010-11 Q1 2010-11	<a href="#">Table 14.6</a>
Complaints responded to within 20 working days Quarterly Annual	2007-08 Q4 2007-08	<a href="#">Table 14.2</a>
Appeals closed* Quarterly Annual	2013-14 Q1 2013-14	<a href="#">Table 14.15</a>
Complaints categories for appeals closed* Quarterly Annual	2014-15 Q1 2014-15	<a href="#">Table 14.16</a>

NRES (telephone enquiries received) Quarterly Annual	1997-98 Q2 1998-99	<a href="#">Table 14.13</a>
<b>Discontinued time series</b>		
Appeals opened Quarterly Annual	2009-10 Q4 to 2013-14 Q4 2010-11 to 2012-13	<a href="#">Table 14.14</a>

\*Dates relate to Transport Focus appeals data, London TravelWatch is included from 2015-16 Q1



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