Annette Egginton

Head of Competition and Consumer Policy Directorate of Railway Markets & Economics



Email: annette.egginton@orr.gsi.gov.uk

24 February 2017

Fraser Brown Business Lead Heathrow Express

Dear Fraser

Approval of Heathrow Express Operating Company Limited Complaints Handling Procedure (Condition 6 of the Statement of National Regulatory Provisions: Passenger)

Thank you for submitting your draft Complaints Handling Procedure (CHP) for approval. A copy of your revised CHP is attached to this letter, and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your CHP against the 2015 "Guidance on complaints handling procedures for licence holders" (the guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your Statement of National Regulatory Provisions (SNRP): Passenger. We also sought views on your draft CHP from London TravelWatch.

We welcome your aim to respond to passenger complaints within 10 working days, which we believe is likely to be positive for passengers.

You have confirmed that where a complaint has not been resolved and your internal procedures have been exhausted, you will provide information on Alternative Dispute Resolution (ADR) to the complainant, in accordance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015. This information will usually be highlighted to complainants in the second substantive response, when details of London TravelWatch are also given. We understand that you will identify an approved ADR provider (in this case Ombudsman Services, trading as the Consumer Ombudsman) but that you do not plan to make use of this provider and instead complainants will be advised to contact the existing passenger bodies. Where a complainant does contact Ombudsman Services you have an arrangement in place whereby they will be referred to the relevant passenger body.

This approach appears to discharge the information requirements in the Regulations, however, please note we will be engaging with RDG and the Department for Transport as to the application of the ADR regulations more generally and this may result in the need to revisit policies in due course.



You have confirmed that you will be making changes to your website in order to meet the minimum requirements of the guidance. You have confirmed that you will provide link to your CHP along with information on your complaints handling service standards, such as response times. You have committed to completing this work upon final approval of your CHP. Please confirm when this has been completed, which should be within one month of the date of this letter.

In the case of Heathrow Express, the relevant passenger body is London TravelWatch. In line with the requirements of the guidance, licence holders must establish an appeals handling protocol where the passenger bodies require this. We understand that these protocols have now been finalised and we expect licence holders to abide by them in their handling of appeals.

Yours sincerely,

Annette Egginton



COMPLAINTS HANDLING PROCEDURE



Contents

1.	Introduction	3
1.1.	Our promise to you	3
2.	Making a Complaint	3
2.1.	You can contact us in the following ways:	3
2.2.	What to include in your complaint:	4
3.	What to Expect from Us	6
3.1.	Response times	6
3.2.	Still not happy?	7
3.2.1.	Internal appeal	7
3.2.2.	External appeal	7
3.2.3.	Alternative dispute resolution	8
3.2.4.	Online dispute resolution	9
3.3.	Frivolous or vexatious issues	9
3.4.	How we manage customer information	9
3.5.	Ownership of complaints	9
4.	Continuous Improvement	11
4.1.	Learning from complaints	11
4.2.	Pro-active learning	11
5.	Contact Us	12
6.	Compensation and Refunds	13
6.1.	Compensation	13
6.2.	Refund	13
6.3.	Claims for personal injury	14
6.4.	Damage to clothing or property	14
6.5.	Request for insurance letter	14
6.6.	Publicising the details of our complaints process	14
6.7	Accessibility requirements	1/

1. Introduction

Heathrow Express wants to get you from A to B, hassle-free. But, however hard we try, sometimes we will make mistakes. When we do we want to put them right quickly and conveniently. We also value your feedback and aim to learn from it, to avoid making the same mistake twice. This leaflet explains how to complain, what to expect and who you go to if you are not happy with the outcome.

1.1. Our promise to you

Heathrow Express commit to providing excellence in customer service at all times. This includes carrying out a full and fair investigation of all complaints we receive, regardless of which channel customers use in order to make refund requests, complaints, purchase tickets, or make other enquiries or comments. This document details the process by which these are received, investigated, fulfilled and closed.

We will provide a full written response to all complaints in plain English, free from initials or acronyms. We will ensure that all complaints are resolved and that is there are no outstanding actions required on our behalf.

We commit to provide passengers with staff that are well trained, including in the handling of complaints, and to deliver a complaints process that is subject to high level governance. All complaints will be fully investigated and a satisfactory response provided. If passengers are unsatisfied, we will make the escalation procedure and options available to them clear – in this document, online and elsewhere.

2. Making a Complaint

A complaint is expression of dissatisfaction by a customer, or potential customer, about our service or our policy. If you are unhappy with a member of our staff, the quality of our services or facilities, or you feel we have not delivered on what we have advertised then please let us know.

2.1. You can contact us in the following ways:

Face-to-face – we will try to resolve your problem on the spot, this may include referring you to another member of staff, for example the station manager. If the matter cannot be resolved there and then we will either give you a contact card or refer you to our website.

Telephone – we will listen to you, record the details of your complaint and try to resolve the matter straight away, if we can. If we cannot, we will give you a reference number and follow-up on the matter. If you are seeking a refund, we will give you details of the feedback form or our postal address as refund requests must be received in writing.

Post – we will log the details of your complaint, investigate the matter and respond within 10 working days of receipt, enclosing compensation if this is appropriate.

Email – we will log the details of your complaint, investigate the matter and respond within 10 working days of receipt. We will request a postal address for compensation, if this is appropriate.

Social media – we will reply, or make a note of your feedback or contact you for an email address, if you are making a complaint, within 24 hours.

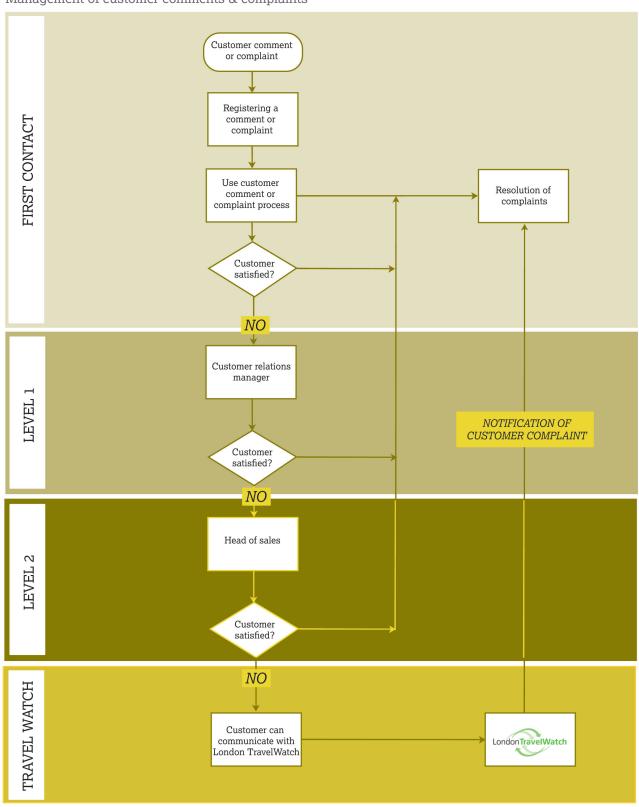
All our contact details are in the Contact Us section on page [11].

2.2. What to include in your complaint:

- Tell us clearly what happened
- Tell us clearly what happened
- Why you are dissatisfied
- What you would like us to do
- Any relevant evidence (for example tickets or photos)
- Your full name and address
- Your preferred contact details (post, email or telephone)
- The date, time and location of the incident such as
- The name of the station or
 - i The time and destination of the train (e.g. the 15.18 from Heathrow Terminal 2 & 3 to Paddington)
 - ii The location of the facility
 - (e.g. Platform 6 at Paddington was untidy or the toilet in the last carriage was out of order)

Our complaints procedure in a flow chart

Management of customer comments & complaints



3. What to Expect from Us

Our staff are trained to deal politely, consistently and constructively with customer feedback and complaints. This way we can deliver on *Our promise to you* (see Section 1.1). Our staff will pay careful attention to your issue or problem, using a pleasant manner. They will be empathetic, seek to understand your perspective and make every effort to satisfactorily meet your requirements – if it is reasonable or achievable to do so.

3.1. Response times

Contact Type	Response Target*	If Investigation Required
Letter	10 days	Final response – 10 working days
		Complaint about staff – 10 working days
Email	2working days	Holding response – 2 working days Final response – 10 working days We will aim to respond to messages within 2 working days and give a final response within 10 working days however if a complaint is received that needs further investigation we may take longer to get back to you.
Refunds (including national rail tickets)	6 working days (once payment details received)	If National Rail related response times will be those of the related operator.
Phone	3 rings (10 seconds)	
Answer % (not abandon)	95% answered	
Call backs	1 working day	

During periods when the Customer Relations Team is exceptionally busy response times may be longer. Customers will receive a holding email, or a voicemail message depending on their method of contact, which will explain the exceptional circumstances and that we will endeavour to reply as quickly as possible.

A message explaining that we are experiencing high volumes of communication will also be clearly visible on our website and will explain that we will reply as soon as possible.

More complex complaints may also take longer to investigate, as we might need to talk to staff or other organisations, take statements, check CCTV or transaction data. If this is the case, we will let you know. We will respond to 95% of complaints within 20 working days.

3.2. Still not happy?

3.2.1. Internal appeal

Heathrow Express will make every effort to ensure that complaints are resolved, with no actions outstanding. However, if you are not happy with the way you have been treated or the outcome of our complaints process then you can ask for the matter to be escalated. Let us know exactly why you are unhappy. Our Customer Relations staff will then promptly bring the matter to the attention of the Head of Customer Relations or, in their absence, another company senior manager. Where possible, staff assessing an appeal will not have had previous sight of it.

If you wish, you can write to them directly:

By post:

Heathrow Express Customer Relations Department Freepost LON16331 London W2 6BR By international post:
Heathrow Express Customer Relations Department
The Compass Centre
Nelson Road, Hounslow
Middlesex TW6 2GW
United Kingdom

They will review your issue or problem again sympathetically, looking at whether the matter was handled correctly and whether the outcome was fair. They may choose to uphold the original decision or to revise it. They will write to you explaining their reasoning.

3.2.2. External appeal

Heathrow Express will make every effort to ensure that complaints are resolved, with no actions outstanding. If you're unhappy with our reply please let us know. Alternatively you can write to London TravelWatch, independent consumer watchdogs, established by Parliament to protect and champion passengers' interests. They will consider your case and, where they believe it is appropriate, will follow things up with us on your behalf. These details will be provided to customers in our second substantive response to your complaint.

We will ensure that London TravelWatch have all the relevant information they need to review cases – something of value to passengers and the industry. The provision of such data is covered in the individual CHPs signed by each operator/provider and is therefore compliant with Data Protection regulations. We will aim to provide any information requested within 3-5 working days, and acknowledge receipt of an appeal within 2 working days. We will aim to respond to appeals within 10 working days and we will write to you if we require longer, in difficult or challenging cases.

London TravelWatch www.londontravelwatch.org.uk

email: enquiries@londontravelwatch.org.uk

Tel: 0203 176 2999

Twitter: @londontravelwatch Freepost RTLL-EGJR-YJHY 169 Union Street London SE1 0LL



3.2.3. Alternative dispute resolution

Where we are unable to resolve your complaint internally, we are required to advise you that "Ombudsman Services" who are providers of Alternative Dispute Resolution (ADR) services for the rail industry and who could deal with your complaint, if we were also participating in ADR. However, as London Travelwatch already provide a mediation service for passengers in the rail industry, we will not participate in the ADR process offered by Ombudsman Services

Ombudsman Services
PO Box 730
Warrington
WA4 6WU
Tel: 0330 440 1614
www.ombudsman-services.org

3.2.4. Online dispute resolution

An online complaint refers to a complaint made in relation to an online purchase via our website. Where we are unable to resolve your online complaint internally, consumers should be aware of the Online Dispute Resolution process. Further details may be found at: http://ec.europa.eu/

3.3. Frivolous or vexatious issues

If a member of staff deems a complaint to be untrue or unfounded and when a customer refuses to accept a valid response, Heathrow Express may terminate correspondence. In this instance, the customer will be informed by the appropriate communication method – email or letter dependent on how the case has been dealt with up to this point and the decision will be made by the Customer Relations Manager who will document it for future reference.

In this instance, if the customer believes this response is not appropriate they are able to contact London TravelWatch and we will provide them with full contact details in order to do so (see Section 3.2.2 above).

3.4. How we manage customer information

In line with our obligations under the Data Protection Act (DPA) 1988, Heathrow Express will ensure that complainants' confidentiality is protected. Personal details or details about complaints will not be divulged to third parties, except with the written consent of the complainant.

3.5. Ownership of complaints

- When Heathrow Express has caused a delay to a journey, it will be dealt with by Heathrow Express.
- When complaints relate to Network Rail as a supplier, for example in the case of a signal failure, Heathrow Express will deal with the complaint.
- If a complaint relates to a different rail provider, for example where a passenger has collected or bought tickets for another provider at a Heathrow Express station the complaint will be redirected to the other train company if the root cause of the issue does not lie with Heathrow Express. The process we will follow will ensure;
 - i Heathrow Express forward the passenger's complaint to the train provider directly and inform the complainant that we have done this.
 - ii If the complaint involves more than one party (or licence holder), we will coordinate a single response on behalf of all licence holders.
 - iii If the bulk of the complaint rests with another licence holder, we will pass it on to the more appropriate party and inform the complainant of our action.

4. Continuous Improvement

Heathrow Express has embedded a continuous improvement process. This involves regularly reviewing our policy and its effectiveness to ensure we are delivering on our commitments to you.

4.1. Learning from complaints

We do this by collating the complaints centrally and classifying them. We can then monitor and audit our performance and seeing what lessons we can learn from the contents of the complaints and comments we receive. We then use the intelligence gained to make changes in light of our findings.

We report on our complaints performance internally every month to the Heathrow Express Senior Leadership team and Non-Executive Directors chaired by the Business Lead This ensures our directors and managers have a good understanding of our customers' concerns. The board reviews our performance against our internal targets and the volume of complaints, broken down by class of complaint, and whether they are increasing or declining. The board also considers what action, if any, should be taken in light of the volume and nature of the complaints and feedback received, and who should own that action. It also reviews the effectiveness of remedial measures taken at previous meetings.

We review complaints about individual staff members, mindful of the wider context, and consider what action, if any should be taken, for example refresher training. The Safety Team are responsible for considering whether any injury sustained by a customer is reportable to **ORR** under **RIDDOR**.

We also report to the Office of Rail and Road each period.

Our Customer Relations Manager reviews our **CHP**, and our auditing and monitoring processes at least once a year. We will consult with London TravelWatch during the review.

4.2. Pro-active learning

In addition to reacting to feedback, we also actively seek out other sources of business intelligence. This includes the use of the National Passenger Survey, our own regular customer surveys as well as commissioning ad hoc research projects. Examples of the latter recently include our Surface Access Report and our Social Listening Report – which allows us to measure customer sentiment as well as just complaints. These findings are closely monitored at board level and inform both operational and strategic thinking.

5. Contact Us

As well as being here to help with your queries and complaints, we would love to hear your feedback on how we can improve our service.

You can contact us via:

Our Feedback Form on our website heathrowexpress.force.com/feedback

Our Complaint Form on our website, use our Customer Query Form (link above) and choose "complaint" in the query drop down.

Phone

Our Customer Relations Department is on +44 (0) 345 600 1515 Open 09:00-17:00hrs GMT Monday-Friday. Calls from the UK to this number are charged at the local rate. Costs from international networks may vary.

Post

Heathrow Express Customer Relations Department Freepost LON16331 London W2 6BR

International Post

Heathrow Express Customer Relations Department The Compass Centre Nelson Road, Hounslow Middlesex TW6 2GW United Kingdom

Social Media

You can contact us on Twitter @HeathrowExpress

On social media channels all enquiries are responded to on weekdays from 7am to 9pm and on weekends from 8am to 6pm, with further operational updates outside of these hours.

Please include an email address and contact phone number in your letter to enable us to contact you about your query.

6. Compensation and Refunds

We will give customers compensation for delays to their journey. As a minimum this would be in line with National Rail conditions of carriage, however Heathrow Express has an in house Delay Repay scheme, details of which can be found in this leaflet.

6.1. Compensation

Customers whose journey on Heathrow Express is delayed by more than 15 minutes are entitled to compensation equal to 50% of the Heathrow Express portion of their journey. If their journey on Heathrow Express is delayed by more than 30 minutes, they are entitled to compensation equal to 100% of the Heathrow Express portion of their journey. Any delays of 15 minutes or less will not result in entitlement to any refund. Compensation will be payable by the same method as which the ticket was originally purchased, if a ticket was purchased by cash, customer services will contact customer to agree a method of payment. If we can't refund by original method then the customer will be contacted to seek an alternative preferred method. Applications can be made via the website, by phone or by letter and should detail the circumstances involved.

We are committed to raising awareness of compensation rights amongst passengers. We will do this by; making announcements on delayed services; providing details on our website; through social media; prominent displays in stations; and by distributing Customer Refund cards on delayed services or where a staff member identifies through discussion with a passenger that they may be entitled to compensation. Staff will be trained accordingly.

6.2. Refund

Refunds for tickets bought at any Heathrow Express sales point can be obtained, if requested, in person within twenty minutes of the ticket purchase and will be credited the same way as the ticket was originally purchased. Other refund requests need to be made to the Heathrow Express customer relations team in writing or by telephone. Refunds by customer relations will be credited to the card account used to purchase the ticket or where this is not possible by cheque. Refunds on tickets bought on the Heathrow Express website will be made by crediting the card account used for the purchase. Where it is not possible for refunds to be made by either of these methods alternative arrangements will be made at the discretion of customer relations.

6.3. Claims for personal injury

Our [Head of Safety] will investigate the matter and then forward your claim details to the [Customer Relations Manager], who will also consider whether the matter is reportable under RIDDOR.

6.4. Damage to clothing or property

If you submit to us the damaged article and details of the circumstances in which the damage occurred, we will consider repairing or replacing it.

6.5. Request for insurance letter

If you requests an insurance letter, we will respond within 48 working hours of receipt. Please provide accurate information regarding the date, time and your direction of travel.

6.6. Publicising the details of our complaints process

We will ensure customers are aware to whom they can complain by making details available via:

- Contact cards, distributed by staff on platforms and trains
- Prominent displays at stations
- Social media
- Our website.

6.7. Accessibility requirements

Copies of the customer facing version of this document, Heathrow Express Contact Cards and the Heathrow Express Conditions of Carriage are available in Braille and Large Print formats and can be provided on request. A parent, carer or support worker may make a complaint if the person who has grounds to complain is a child, cannot make the complaint themselves because of physical or mental incapacity, or has asked you to act on their behalf. If a customer asks someone else to act on their behalf they must give their express permission to a member of our Customer Relations Department, either verbally over the telephone or in writing.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

Customer Relations Process & CHP

i. Document ownership and review

This process is owned by the Head of Finance.

It will be reviewed and updated as necessary; the minimum review frequency is 2 years.

ii. Document history

Date	Issue Number	Changes Made
Sep 2013	1	New procedure.
June 2015	2	Updated.
Jan 2016	3	Updated to comply with ORR guidance on complaints handling procedures.
Aug 2016	4	Updated in response to ORR feedback.
Feb 2017	5	Updated in response to ORR feedback.

iii. Document location and distribution

This document is available in electronic format through the company *Document Management System* which is located on the HAL workspace. Hard copies will not be distributed internally within Heathrow Express but may be distributed to stakeholders via the Company Document Controller.

iv. Signature of document owner:

	Mick Leyden, Head of Finance
Signature of approver:	
	_ Spencer Adaway, Head of Sales
Signature of document author:	
	Jesse Morgan, Consultant



Issue number:

Only CONTROLLED when accessed live in the Hex Document Management System.
UNCONTROLLED if electronically copied or printed.

Document number: HEXMS-WI137

Document title: Customer Relations Process Process & CHP: Revenue and Accounting

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5

Contents

1.	Pur	pose, Context and Overview	4
2.	Trai	ning and Development	4
3.	Res	ponsibilities	6
4.	Defi	initions and Abbreviations Used in this Document	6
5.	Ref	erences	7
6.	Stal	keholders	7
7.	Con	nplaints Handling Service Standards	8
8.		roach to the Different Customer Communications Methods	
	3.1.	Face-to-face	8
	3.2.	Phone calls	
;	3.3.	By post	9
8	8.4.	Letter of complaint	9
8	8.5.	Emails	10
	3.6.	Social media	11
8	8.7.	Publicising the details of our complaints process	11
9.	Con	npensation and Refunds	12
,	9.1.	Compensation	12
,	9.2.	Refund	12
,	9.2.1.	Processing refunds from an unused ticket – credit/debit card	13
,	9.2.2.	Processing refund for delay/ cancellation – by credit/ debit card	13
,	9.2.3.	Processing refund for unused ticket or delay/ cancellation – by cheque	14
,	9.2.4.	Reporting and control	
,	9.2.4.	1. Salesforce reports	14
,	9.4.1. ⁻	1. Reconcile refunds processed to bank	15
10	. Oth	er Customer Relations Issues	15
	10.1.	Complimentary tickets	15
	10.2.	Complaints about service/staff	15
	10.3.	Request for insurance letter	15
	10.4.	Accessibility requirements	16
	10.5.	Information on managing customer information	16
	10.6.	Ownership of complaints	16
	10.7.	Targets and SLAs	17



Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting

Originally Issued: Last revised: Issue number:

September 2013 Feb 2017

10.7.1	I. External SLAs – response time targets	17
10.7.2	2. Exceptional circumstances	18
10.8.	Internal SLAs	19
10.9.	Procedures for credit card refunds and data handling	19
10.10	. Customer Relations Process – key controls	20
11. Cus	stomer Escalation Process	21
11.1.	Document hierarchy	21
11.2.	The process	21
11.2.1	First contact	21
11.2.2	2. Escalation Level 1	21
11.2.3	B. Escalation Level 2	22
11.2.4	4. Unresolvable issues	22
11.2.5	5. Alternative dispute resolution	23
11.2.6	S. Online Dispute Resolution	23
11.3.	Frivolous or Vexatious Issues	23
11.4.	*See Appendix 3 for process overview escalation records	24
12. Cor	ntinuous Learning	25
12.1.	Learning from complaints	25
12.2	Pro active learning	25

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised:	September 2013 Feb 2017

1. Purpose, Context and Overview

Heathrow Express commit to providing excellence in customer service at all times. This includes carrying out a full and fair investigation of all complaints we receive, regardless of which channel customers use in order to make refund requests, complaints, purchase tickets, or make other enquiries or comments. This document details the process by which these are received, investigated, fulfilled and closed.

We will provide a full written response to all complaints in plain English, free from initials or acronyms. We will ensure that all complaints are resolved and that is there are no outstanding actions required on our behalf.

We commit to provide passengers with staff that are well trained, including in the handling of complaints, and to deliver a complaints process that is subject to high level governance. All complaints will be fully investigated and a satisfactory response provided. If passengers are unsatisfied, we will make the escalation procedure and options available to them clear – in this document, in the customer facing version of this documents, online and elsewhere.

2. Training and Development

Heathrow Express are committed to ensuring that our customer interactions and communications are of the highest standard. We have comprehensive staff training plans in place for all customer staff. This is part of our competency management system that ensures all staff training is rigorously implemented and monitored. This training includes customer service training that includes complaints handling, complaints investigation and resolution skills. We employ classroom based training, with tutor lead presentations and videos, as well as a practical training in the field observing real-life scenarios.

Training arrangements are assessed every year by the Head of Competence.

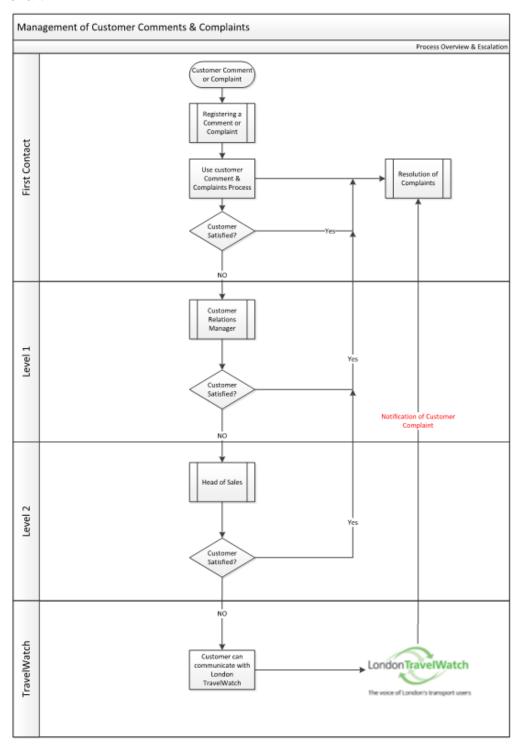
To ensure our complaint handling staff are able to deliver on our commitments to our customers, we assess their understanding on a 1-2-1 basis before issuing a certificate of competence at the end of their induction. Refresher training for complaints handling for each staff member takes place at least every 24 months, or sooner if we feel a staff member could benefit from it.

There are also pre-shift briefings for all staff which provides an informal channel to pass on feedback and complaints on a daily basis.

We have a quality assurance framework in place to ensure our complaints handling procedure is efficient and effective, and that all communications are of a high standard, while easy to read. We do this by training people correctly, reviewing our written communications on at least an annual basis (involving London TravelWatch), and monitoring relevant feedback.



CHP flow chart:



Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

3. Responsibilities

Responsible Party	Responsibilities
Customer Relations Team	To receive and manage the processing of customer enquiries, feedback and complaints.
Customer Relations Manager	To manage the team and ensure resolution of all customer communications including escalated cases ensuring that relevant departments are involved where necessary.
Head of Sales	Overall ownership of the customer relations team and manager.
Head of Sales	To decide on Heathrow Express' final response to escalated cases.
Head of Sales	Keep Heathrow Express' Customer Relations Process up to date.
Finance Department	To ensure that refund handling processes are up-to-date and fit for purpose.
Customer Relations Manager and Head of Sales	To ensure all Customer Relations staff are aware of these policies and are appropriately trained.
Service/Training Manager	To ensure all Customer Facing staff are appropriately trained.

4. Definitions and Abbreviations Used in this Document

Term	Definitions
Customer	A member of the public who contacts Customer Relations regarding an issue relating to the service provided by Heathrow Express.
Escalation	The process by which an issue is raised to a staff member of a higher level either when a staff member feels that they cannot resolve an issue on their own or when a customer insists that a matter should be raised.
Customer Relations Team	The team that receive communication from Heathrow Express customers.
Senior Manager	A manager of authority with the ability to deal with an issue that, if not dealt with appropriately, could tarnish the company's reputation e.g. often with the title "Head of".
Complaint	An expression of dissatisfaction by a customer or potential customer about service delivery or company policy.
Issue	An important topic or problem for debate or discussion.
London TravelWatch	Independent statutory watchdog for passengers in London.
Salesforce	System used by Customer Relations to log all contact from customers e.g. complaints, compliments, suggestions.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised:	September 2013 Feb 2017

DPA	Data Protection Act	
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5. References

Heathrow Express Information Security Policy Heathrow Express Thorough Ticketing Process

Heathrow Express Data Protection Policy

Heathrow Express Data Reporting Process

6. Stakeholders

London TravelWatch

Office of Rail and Road

Heathrow Insurance/Claims Department

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

7. Complaints Handling Service Standards

Heathrow Express is committed to providing the highest standards of customer care, in particular when handling complaints. All of staff are well trained and we will handle your complaint politely, investigate the matter fully in a timely manner (see 10.7.1 Response times), and provide you with a satisfactory response. This process is overseen by senior staff (see 10.6 Ownership of complaints), with a clear escalation process in place and, in the event you remain unsatisfied with how be handled your complaint, we will explain how you can appeal to an independent body. We will measure our success by recording the percentage of complaining passengers who were satisfied with how their complaint was handled.

8. Approach to the Different Customer Communications Methods

Our staff are trained to deal politely, consistently and constructively with customer feedback and complaints, in accordance with our commitment and SLAs, regardless of which communication channel they arise. This includes the capacity to characterise feedback from customers as complaints, where appropriate, and either channel them towards our website or provide them with a contact/refund card or escalate the matter, as circumstances require. This training is embedded in our Competency Management System.

8.1. Face-to-face

- Any issues or complaints dealt with in a face-to-face manner, for example at a station or on a platform, and resolved on the spot do not need to be recorded.
- If an issue or complaint is raised to a member of staff in a face-to-face setting the
 customer should be given a contact card if one is available at the site of the interaction
 or alternatively be directed to our website to give their feedback or make a complaint.

8.2. Phone calls

- If a customer has called to register a complaint
 - Customers may complain over the phone and will be given a reference number after the customer service officer has registered the details of the complaint in Salesforce. If a customer is requesting a refund they will be redirected to the feedback form or given the postal address as refund requests must be received in writing.
- If a customer is calling to provide credit card details for a refund to be processed:
 - Locate original case in Salesforce (Process Flowchart ref 8.2).

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

- o Confirm refund amount and cancel unused ticket.
- Open Barclaycard and issue refund (see Refund section).
- Update compensation fields in Salesforce and close case.
- Customer wishes to purchase tickets:
 - Login to HEX trade site and select correct sales category (general, discount, complimentary) complete transaction and issue customer with their E-ticket/s.
 - o If an enquiry is made regarding a group discount, transfer to Business Development team or take customer contact details and arrange for a call back.
- Customer has called with a general enquiry.
 - Provide the customer with the relevant information and resolve the call. If necessary take contact details and offer to call back.

8.3. By post

(External Post – 10 working days to process).

- Post is delivered by 11am.
- All post opened, stamped with date received and put in LOG tray (ref 8.18).
- Post is logged (entered in Salesforce) and a case raised (ref 8.2).
- Post is then separated into:
 - Letters
 - Refund Forms

Letters are placed in the 'pending' tray located in the Customer Relations cupboard.

8.4. Letter of complaint

If a letter of complaint is received:

- Letter is received in the post and date stamped (ref 8.18) and logged in Salesforce (ref 8.2).
- Letter is then stored in the 'pending' tray located in the Customer Relations filing cupboard.
- Investigate complaint (Ref 8.7).
 - o Train delays refer to HECR Management Reports (Service Delivery Log).
 - General complaints see list.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

- Respond to letter (within 10 working days of receipt) issue cheque or send compensation as necessary.
- Print two copies of response to customer:
 - 1 copy to be sent to customer.
 - 1 copy to be attached to customer case in Salesforce.
- Send response to customer take it down to the post room on ground floor (Sent 1st Class).
- Open Salesforce Update, case note and close case file (ref 8.2).

8.5. Emails

8.5.1. Emails received via web (into Salesforce)

For all email correspondence received via Salesforce – A new case is automatically created when a customer has registered their complaint or refund request via the automated forms on the HEX website (ref 8.3).

- Open new case in Salesforce and read comments and details provided by customer.
- If a complaint or refund request has been registered:
 - o Follow complaint or refund process.
 - According to action taken, change status of case in Salesforce after a response has been emailed to the customer.
- IN PENDING if sufficient information has been received to process the refund or customer has been requested to pay an unpaid fare.

Note: If required information has not been received after 1 month, Salesforce send out an automated email reminding customers that they need to contact us, if no response is received to the follow up after a further 7 days, case will close and customers will receive an email stating that their case has closed (use discretion as to whether to re-open the case, if the customer contacts us after this time).

- IN PROGRESS complaint being investigated.
- REVIEW Customer has responded and provided required details.
- APPEAL Customer is not happy with response Case is assigned to CRM.
- CLOSED Complaint or refund request has been resolved.

8.5.2. Emails direct to Social Media address

For all emails received via our social media outlook: social_media@heathrowexpress.com.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

- Customers are asked to provide further information about their issue/complaint via this channel:
 - Log case via Salesforce and respond to case (within 24 hours) (ref 8.2).
 - Move email to read.
 - o Follow complaint or refund process.
 - o If further information or action is required.
 - Person on Social Media duties needs to check this daily. Any remaining issues by the end of the week need to be documents in the handover email, sent out on the Sunday evening.
 - If any credit card details are received by email, process straight away and delete the email.

8.6. Social media

- On social media channels all enquiries are responded to on weekdays from 7am to 9pm and on weekends from 8am to 6pm with further operational updates outside of these hours.
- General feedback is passed on to the relevant internal personnel, however, if a customer expresses a desire to formally complain via social media they will be directed to use Heathrow Express' online feedback form to get in contact. This means their complaint can be given a reference number and they can be kept informed of timescales.

8.7. Publicising the details of our complaints process

We will ensure customers are aware of how to whom they can complain by making details available on:

- Contact cards, distributed by staff on platforms and trains
- Prominent displays at stations
- Social media
- Our website.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

9. Compensation and Refunds

We will give customers compensation for delays to their journey. As a minimum this would be in line with National Rail conditions of carriage, however Heathrow Express has an in house Delay Repay scheme, details of which can be found in this manual.

9.1. Compensation

Customers whose journey on Heathrow Express is delayed by more than 15 minutes are entitled to compensation equal to 50% of the Heathrow Express portion of their journey. If their journey on Heathrow Express is delayed by more than 30 minutes, they are entitled to compensation equal to 100% of the Heathrow Express portion of their journey. Any delays of 15 minutes or less will not result in entitlement to any refund. Compensation will be payable by the same method as which the ticket was originally purchased, if a ticket was purchased by cash, customer services will contact customer to agree a method of payment. If we can't refund by original method then the customer will be contacted to seek an alternative preferred method. Applications can be made via the website, by phone or by letter and should detail the circumstances involved.

We are committed to raising awareness of compensation rights amongst passengers. We will do this by; making announcements on delayed services; providing details on our website; through social media; prominent displays in stations; and by distributing Customer Refund cards on delayed services or where a staff member identifies through discussion with a passenger that they may be entitled to compensation. Staff will be trained accordingly.

9.2. Refund

- Customers who have purchased a ticket in person at a Heathrow Express ticket office (TOM) can obtain a refund straight away if they request it within 20 minutes of purchase (ref 8.1). Other refund requests need to be made to the Heathrow Express customer relations team.
- Check tickets and customer comments on refund form to confirm whether the refund is due (ref 8.7) to:
 - o **Unused Ticket:** if a refund is due for an unused ticket in full or partially.
 - Delays or Disruptions: confirm times and dates against the Service Disruption Report provided by HECR.
- Once the amount to be refunded has been calculated obtain approval for refunds from finance Department if amount includes an expense reimbursement (e.g. taxi fare) and is more than £100.00 above the ticket price refund (ref. 8.8).
- Sign into the Barclaycard Database or arrange for a cheque to be raised.

The refund will be processed (ref 8.9) using one of the following methods:

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

9.2.1. Processing refunds from an unused ticket - credit/debit card

- Open one of the two Barclaycard EDPQ systems (depending on what currency you are refunding to).
- Open GuestLogic/ backoffice.
- Check if ticket is used.
- Cancel ticket.
- Check the last 4 digits of the credit card given match the same as the ones given at time of purchase.

Note: When refunding to other currencies, not GBP, please take down the customer CVC details as well.

- Enter Barclaycard, enter the sum, case number and customer surname and confirm the payment request to the bank (ref. 8.12 and 8.13).
- Enter Salesforce. Under the compensation section, fill out:
 - 1. Compensation Paid
 - 2. Payment Reference
 - 3. Card Type
 - 4. Compensation Currency
 - 5. Compensation Type Card/ replacement ticket/ cheque
 - 6. Send out case closed template this automatically closes the case (ref 8. 21).

Return Journey Only – if refunding the return journey only, subtract the price of a single ticket from the price of a return ticket and refund the difference (£35.00 - £21.50 = £13.50).

9.2.2. Processing refund for delay/ cancellation - by credit/ debit card

Check Service Delivery Log or disruption sheet:

- Assess whether the customer is eligible for a refund.
- Open Barclaycard.
- Check the last 4 digits of the credit card given match the same as the ones given at time of purchase.
- Enter Barclaycard, enter the sum, case number and customer surname and confirm the payment request to the bank (ref. 8.12 and 8.13).
- Enter Salesforce. Under the compensation section, fill out:
 - 1. Compensation Paid
 - 2. Payment Reference
 - 3. Card Type

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

- 4. Compensation Currency
- 5. Compensation Type Card/replacement ticket/ cheque
- 6. Sent out Case closed template this automatically closes the case. Close case (ref 8. 21).

Return Journey Only – Refund is based on the delay and re-pays policy, so the customer is either entitles to a 0% refund, 50% refund or 100% refund (Determined by length of delay experienced).

If customer is not eligible for a refund, open Salesforce, send email/letter to explain why (ref. 8.20) and trigger case to close by using correct template (Ref 8.21).

9.2.3. Processing refund for unused ticket or delay/ cancellation – by cheque

If a refund requires a cheque to be issued:

- Request the cheque book from finance.
- Fill out cheque details (amount, date and customer name) (ref. 8.10).
- Attach case to cheque (i.e. letter to cheque for verification purposes).
- Pass cheque to authorised personnel to verify and sign (Mark Lennon AND Mick Leyden) (ref. 8.11).
- In Salesforce, update:
 - 1. Compensation Paid
 - 2. Cheque Number
 - 3. Cheque requested date date sent out
 - 4. Compensation Currency
 - 5. Compensation Type Cheque
- Place cheque in envelope with letter and compliment slip.
- Take down to the post room on ground floor by 3pm, if after this time place in secure cupboard (ref. 8.17).

9.2.4. Reporting and control

9.2.4.1. Salesforce reports

 Weekly refunds reports produced from Salesforce detailing the refunds made the previous week (ref 8.4).

Reports reviewed by customer services and Head of Communications for volume and £ value, and check any anomalies, refunds above £1,000 (ref 8.5).

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

9.4.1.1. Reconcile refunds processed to bank

- Refund payments over £1,000 will be reviewed on a monthly basis by finance and recorded in a review log. This will involve producing a monthly report of refunds made and sorting by size of transaction (ref 8. 14).
- Review customer Relations weekly/ monthly reports from Salesforce and reconcile to bank statement (ref 8.15).

10. Other Customer Relations Issues

10.1. Complimentary tickets

If a monetary refund is not to be issued and a complimentary ticket is offered in lieu:

- Log in to Tradesite
- Process ticket and issue to customer either via email or in post
- In Salesforce
 - 1. Compensation Type
 - 2. Complimentary ticket type
 - 3. Ticket reference number (in case comments)
 - 4. Send customer email advising ticket issued and close case (ref 8.21)
- Place in envelope with compliments slip and place in Post Room for collection by 3pm (ref 8. 25).

10.2. Complaints about service/staff

- If a Customer complaint is received regarding service/staff
 - Forward complaint to relevant person depending on complaint for further information (see list)
 - Respond to customer, advising that their complaint is being investigated and they will receive a response shortly (target: within 5 working days)
 - Log in Salesforce
 - Assign to yourself and place 'In progress' to keep in Customer Relation Officers view.

10.3. Request for insurance letter

- If a customer requests an insurance letter (response time within 48 working hours of receipt):
 - Request accurate information from customer regarding date, time and direction of travel.
 - o Confirm details and reason for delay with HECR report.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

 Send Insurance letter to customer either via email attachment from Salesforce or letter.

10.4. Accessibility requirements

- Copies of the customer facing version of this document, Heathrow Express Contact Cards and the Heathrow Express Conditions of Carriage are available in Braille and Large Print formats and can be provided on request.
- A parent, carer or support worker may make a complaint if the person who has
 grounds to complain is a child, cannot make the complaint themselves because of
 physical or mental incapacity, or has asked you to act on their behalf. If a customer
 asks someone else to act on their behalf they must give their express permission to a
 member of our Customer Relations Department, either verbally over the telephone or
 with a written signature, to approve that Heathrow Express will deal with their
 complaint through third person.

10.5. Information on managing customer information

- In line with our obligations under the Data Protection Act (DPA) 1988, Heathrow
 Express will ensure that complainants' confidentiality is protected. Personal details or
 details about complaints will not be divulged to third parties, except with the written
 consent of the complainant.
- Our processes and procedures are formalised and they fully adhere to the DPA. The Joint Security Team is responsible and conducts regular audits.
- All paper customer files are filed in alphabetical and date order in a locked cupboard at the Compass Centre for a period of 6 months, or until this area is full – whichever comes first.
- After this time they are placed in Heathrow Express' archives where they are stored for 7 years. After this time they are disposed of, via our soft service facilities provider who will arrange for secure disposal.

10.6. Ownership of complaints

- When Heathrow Express has caused a delay to a journey, it will be dealt with by Heathrow Express.
- When complaints relate to Network Rail as a supplier, for example in the case of a signal failure, Heathrow Express will deal with the complaint.
- If a complaint relates to a different rail provider, for example where a passenger has
 collected or bought tickets for another provider at a Heathrow Express station the
 complaint will be redirected to the other train company if the root cause of the issue
 does not lie with Heathrow Express. The process we will follow will ensure;
 - Heathrow Express forward the passenger's complaint to the train provider directly and inform the complainant that we have done this.

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

- If the complaint involves more than one party (or licence holder), we will coordinate a single response on behalf of all licence holders.
- o If the bulk of the complaint rests with another licence holder, we will pass it on to the more appropriate party and inform the complainant of our action.

Key Contacts for Custome	Key Contacts for Customer Relations Queries		
Cleaning issues on the train	Escalate to Duty Operations Manager		
Cleaning issues in the station	Escalate to Duty Operations Manager		
Toilets on the train	Escalate to Duty Operations Manager		
Toilets in the station	Escalate to Duty Operations Manager		
Aircon on the train	Escalate to Duty Operations Manager		
Plug Sockets	Escalate to Duty Operations Manager		
On-board Wi-Fi	Justin Stenner/ Ricky Kaup		
iHEX	Justin Stenner		
Station Engineering Issues	Paul Seeyave		
Ticket Machines	Justin Stenner		
Complaints about staff	Customer Service Managers		
Issues in LHR stations	Paul Seeyave		
HEX TV	Rachel Benjamin		
Price	Head of Pricing		
Public Relations	Bea Asprey		
TIDS	Colin Shallcross		
Digital Displays (LHR)	Rachel Benjamin/ Ben Chipps		
HECR	Colin Shallcross		

10.7. Targets and SLAs

10.7.1. External SLAs – response time targets

Contact Type	Response Target*	If Investigation Required
Letter	10 days	Final response – 10 working days
		Complaint about staff – 10 working days



Email	2 working days	Holding response – 2 working days Final response – 10 working days We will aim to respond to messages within 2 working days and give a final response within 10 working days however if a complaint is received that needs further investigation we may take longer to get back to you.
Refunds (including national rail tickets).	6 working days (once payment details received)	If National Rail related response times will be those of the related operator.
Phone	3 rings (10 seconds)	
Answer % (not abandon)	95% answered	
Call backs	1 Working Day	

10.7.2. Exceptional circumstances

During periods when the Customer Relations Team is exceptionally busy response times may be longer.

An exceptionally busy period for the Heathrow Express Customer Relations Team is defined as one where the service has significant prolonged planned or unplanned service disruption which will impact upon passenger journeys.

Customers will receive a holding email sent via Salesforce or a voicemail message depending on their method of contact which will explain the exceptional circumstances and that we will endeavour to reply as quickly as possible.

A message explaining that we are experiencing high volumes of communication will also be clearly visible on our website and will explain that we will reply as soon as possible.

If delays persist in replying to customers further automated emails will be sent out explaining that their complaint is still being processed and a response will be received as soon as possible. These emails will be sent at appropriate intervals decided by the Customer Relations Manager dependent upon the complexity of the issue causing delayed response times. We will respond to 95% of complaints within 20 working days.

At all points during an exceptional period for the Customer Relations Team at Heathrow Express the customer will be reminded that they can choose to call the Customer Relations Team at any point to seek further information about their complaint.

The customer relations team must communicate with ORR and LTW when these emergency timescales must be applied. This process is laid out in Appendix C.

Heathrow Express The smarter way	
Document number: HEXMS-WI137	
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

10.8. Internal SLAs

Contact Type	Target
Distribute weekly Customer Relations report/ Social Media report	End of play, 1 st working day of week
Weekly staff complaints/compliments	End of play, 1 st working day of week
Filing	End of day
Archiving	Every 6 months
Archive Clear Out (so that no more than 7 years data is retained)	Annually (January each year to clear out a year of documentation from 8 years earlier e.g. in January 2015, documentation for 1st Jan – 31st December 2007 will be disposed of)
Daily	Previous days statistics and progress against SLAs

10.9. Procedures for credit card refunds and data handling

- 1. All sensitive customer information (credit card details, personal details with dates of birth, addresses etc.) should be secured in a locked cabinet outside of working hours. This includes letters, printed emails and customer refund request forms.
- 2. Colleagues should only ever use their personal log in and not share details with anyone else.
- 3. Customer Relations post should be distributed immediately as it arrives, to the relevant person, or filed in a locked cabinet until ready for processing.
- 4. Customer Relations team should destroy any records keeping data on customers immediately after use.
- 5. Refund request forms should be kept for 7 years. The forms should be kept in a secure place.
- 6. At no point should any sensitive customer information be taken outside of the office except to secure storage.
- When customer communications are disposed of, this should be carried out by a reputable company who have appropriate means of disposing of confidential waste.
- 8. Refunds must be authorised within 24 hours of receipt. (Refer to Ticketing & Cash Handling Procedures HEXMS-W1002, issue 6).
- 9. Colleagues should be aware of sensitive data on their desks whilst working and secure it whilst away on lunch in a locked cabinet.
- 10. Colleagues processing credit card refunds will be subject to CRB checks.
- 11. Access to Barclaycard is by login which is set up by Finance.



10.10. Customer Relations Process – key controls

No	Control Description	
	Back Office	
1	Customer refunds must be supported by a written request and submission of a valid ticket.	
2	All refund requests/ complaints recorded in 'salesforce system'.	
3	All customer refund requests are investigated by customer services and verified against the train delay report or checked for non-usage in the case of a straight refund. Refunds are not processed unless the claim can be verified.	
4	Tickets submitted for refunds are cancelled to prevent re-cycling.	
5	Credit card refunds only made to the card that originated the transaction.	
6	Senior Manager approval is required if the customer request is outside of pre- approved reasons for refund. Evidence of approval is retained and stored with the customer return request.	
7	Credit card refunds processed through EDPQ system and money transfers over £100 authorised by the Customer Relations Manager and refunds over £200 need approval from Finance by CR Manager – email trail needs to be attached to case (in absence of CR Manager CRO will request this directly to Finance).	
8	Two members of the Finance team sign all customer return request cheques raised by customer services. These are verified against the customer return request.	
9	Customer relations refunds reconciled on a monthly basis to bank statements.	

Heathrow Express The smarter way	
Document number: HEXMS-WI137	
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

11. Customer Escalation Process

This process is to provide the Customer Relations team with a procedure to follow when a member of the team receives a complaint or issue that they either feel unable to resolve on their own or that a customer requests to be escalated to someone more senior.

11.1. Document hierarchy

Tier 1 can handle issues that can be easily resolved by just a phone call and when the Tier 1 representative feels that the issue cannot be resolved at his level (if for example the problem cannot be resolved by their team alone and needs to be addressed by other support teams/departments with higher level of authority) it is then escalated or moved to the next higher team.

11.2. The process

11.2.1. First contact

When a member of the Customer Relations Team is communicating with a customer, it is their responsibility to pay careful attention to the customer's issue or problem, using a pleasant manner in all types of communication. They should be empathetic, seek to understand the customer's perspective and make every effort, (within their authority), to meet the customer's needs.

11.2.2. Escalation Level 1

Should a Customer Relations team member feel that they are unable to resolve a complaint or issue on their own or should a customer express dissatisfaction with the way in which a matter has been resolved or ask for the matter to be escalated, Customer Relations staff should bring the matter to the attention of the Head of Customer Relations.

In the event that the Head of Customer Relations is not available, the matter should be brought to the attention of another company Senior Manager within the Commercial Department e.g. Head of Sales, Head of Brand & Marketing, Head of Digital, Head of Business Development. If none of these are available on the day, contact details should be taken and an offer should be made to arrange for a Senior Manager to contact them at the earliest possible opportunity (and an indication of a date/time should be given e.g. after 3pm this afternoon/tomorrow morning).

The Senior Manager should pay attention to the customer's issue or problem, using a pleasant manner. They should be empathetic and take on board the customer's issue. Should the matter be relating to customer service or the way an issue has been handled by the Customer Relations Executive, the Manager should assure the

Heathrow Express The smarter way	
Document number:	HEXMS-WI137
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017

customer that the issue will be taken on board and ensure that appropriate action is carried out.

11.2.3. Escalation Level 2

In the extreme circumstance that the customer remains dissatisfied, the customer should be given the opportunity to put their complaint or issue in writing to the Head of Sales at the following address:

By post:

Heathrow Express Customer Relations Department Freepost LON16331 London W2 6BR

By international post:

Heathrow Express Customer Relations Department The Compass Centre Nelson Road, Hounslow Middlesex TW6 2GW United Kingdom

11.2.4. Unresolvable issues

Heathrow Express will make every effort to ensure that complaints are resolved, with no actions outstanding. If you're unhappy with our reply please let us know. Alternatively you can write to Transport Focus or London TravelWatch, independent consumer watchdogs, established by Parliament to protect and champion passengers' interests. They will consider your case and, where they believe it is appropriate, will follow things up with us on your behalf.



London TravelWatch

www.londontravelwatch.org.uk

email: enquiries@londontravelwatch.org.uk

Tel: 0203 176 2999

Twitter: @Iondontravelwatch Freepost RTLL-EGJR-YJHY

169 Union Street London SE1 0LL

Heathrow Express The smarter way	
Document number: HEXMS-WI137	
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

11.2.5. Alternative dispute resolution

Where we are unable to resolve your complaint internally we are required to advise you that "Ombudsman Services" who are providers of Alternative Dispute Resolution (ADR) services for the rail industry and who could deal with your complaint, if we were also participating in ADR. However, as London Travelwatch already provide a mediation service for passengers in the rail industry, we will not participate in the ADR process offered by Ombudsman Services

Ombudsman Services PO Box 730 Warrington WA4 6WU

Tel: 0330 440 1614

www.ombudsman-services.org

11.2.6. Online Dispute Resolution

An online complaint refers to a complaint made in relation to an online purchase via our website. Where we are unable to resolve your online complaint internally, consumers should be aware of the Online Dispute Resolution process. Further details may be found at: http://ec.europa.eu/

11.3. Frivolous or Vexatious Issues

If a member of staff deems a complaint to be untrue or unfounded and when a customer refuses to accept a valid response Heathrow Express may terminate correspondence. In this instance, the customer will be informed by the appropriate communication method – email or letter dependent on how the case has been dealt with up to this point and the decision will be made by the Customer Relations Manager who will document it for future reference.

In this instance, if the customer believes this response is not appropriate they are able to contact London TravelWatch and Heathrow Express will provide them with full contact details in order to do so (11.2.4).

Heathrow Express The smarter way	
Document number: HEXMS-WI137	
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

11.4. *See Appendix 3 for process overview escalation records

*See Appendix 3 for Process Overview Escalation Records

In the event that a customer issue is escalated, this should be recorded in the Customer Relations Escalation log. This will be owned and managed by the Customer Relations Manager. Information should also be recorded in the Salesforce system with details of the date the matter was escalated and to whom, together with a unique escalation reference number. Any escalation issue records should be kept either in a locked cupboard or an electronic file with restricted access (dependent on communication method). Archiving should be carried out in line with Customer Relations archiving policy.

All data relating to customer information should be held and managed in a safe and secure manner in line with DPA requirements, section 8.5 of this document and Heathrow Express' Information Security Policy.

Heathrow Express The smarter way	
Document number: HEXMS-WI137	
Document title:	Customer Relations Process Process & CHP: Revenue and Accounting
Originally Issued: Last revised: Issue number:	September 2013 Feb 2017 5

12. Continuous Learning

Heathrow Express has embedded a continuous improvement process. This involves regularly reviewing our policy and its effectiveness to ensure we are delivering our commitments to our customers.

12.1. Learning from complaints

We do this by collating the complaints centrally and classifying them. We can then monitor and audit our performance and seeing what lessons we can learn from the contents of the complaints and comments we receive. We then use the intelligence gained to make changes in light of our findings.

We report on our complaints performance internally every month to the Heathrow Express Senior Leadership team and Non-Executive Directors chaired by the Managing Director. This ensures our directors and managers have a good understanding of our customers' concerns. The board reviews our performance against our internal SLA and the volume of complaints, broken down by class of complaint, and whether they are increasing or declining. The board also considers what action, if any, should be taken in light of the volume and nature of the complaints and feedback received, and who should own that action. It also reviews the effectiveness of remedial measures taken at previous meetings.

We review complaints about individual staff members, mindful of the wider context, and consider what action, if any should be taken, for example refresher training. The Safety Team are responsible for considering whether any injury sustained by a customer is reportable to ORR under RIDDOR.

We also report to the Office of Rail and Road each period.

Our Customer Relations Manager reviews our CHP, and our auditing and monitoring processes at least once a year. We will consult with London TravelWatch during the review.

12.2. Pro-active learning

In addition to reacting to feedback, we also actively seek out other sources of business intelligence. This includes the use of the National Passenger Survey, our own regular customer surveys as well as commissioning ad hoc research projects. Examples of the latter recently include our Surface Access Report and our Social Listening Report – which allows us to measure customer sentiment as well as just complaints. These findings are closely monitored at board level and inform both operational and strategic thinking.