#### Marcus Clements

Head of Consumer Policy Directorate of Railway Markets & Economics

Email: 🔀

08 December 2017

Jan Chaudhry-van de Velde Managing Director West Midlands Trains Ltd [by email]

Dear Jan

Approval of West Midlands Trains Limited's Complaints Handling Procedure (Condition 6 of your Station Licence and GB Statement of National Regulatory Provisions: Passenger)

Thank you for submitting your Complaints Handling Procedure (CHP) documents for approval. A copy of your approved 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 we also sought views from Transport Focus and London TravelWatch. I can confirm that your revised CHP meets the requirements of Condition 6 of your station licence and GB Statement of National Regulatory Provisions: Passenger (SNRP), subject to the conditions set out below.

We welcome the following, which we believe will bring positive benefits for passengers:

- discretion for frontline staff you have explained that your employees are expected to try to resolve a problem immediately, with a reasonable degree of discretion, wherever possible; and
- a more challenging target response rate for complaints than required by the guidance,
- of a full response to 90% of comments and complaints within 10 working days.

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. 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 (Transport Focus or London TravelWatch). Where a complainant does contact Ombudsman Services you have an arrangement in place whereby they will be referred to the relevant passenger body.

This appears to discharge the information requirements in the Regulations. However, we are engaging with Rail Delivery Group (RDG), the Department for Transport and others as part of an Ombudsman Task Force regarding the introduction of an ADR scheme in the rail sector. This may result in the need to revisit policies in due course. You will continue to be engaged with developing thinking through your representation at RDG.



In the case of West Midlands Trains the relevant passenger bodies are Transport Focus and 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 expect licence holders to abide by this in their handling of appeals.

The main areas where you clarified your policies during our review were:

- your approach to customers choosing to use social media to contact you and confirmation that you will provide the customer with an appropriate mechanism in which to resolve problems as quickly as possible;
- that you will accept complaints from third parties on behalf of the passenger;
- that you will coordinate a single response on behalf of all the licence holders involved where appropriate, or forward the complaint to another licence holder to respond where the bulk of the issues rests with them;
- that the response timescale of 95% of all complaints within 20 working days set out in the published guidance is a requirement rather than a target;
- that you will identify whether or not the complainant is entitled to compensation for delays and flag this up to them; and
- how the strategies and plans developed from complaints information help all staff to understand the importance of complaints handling and continuous improvement.

#### Conditions

You have told us that you will be reviewing staff training needs during the first few months of your franchise and therefore information about your training programme and plans is not yet available. You have agreed to write to us by 10 June 2018 to provide this information. Your CHP is therefore approved on the understanding that this information is provided by the agreed deadline.

You have also agreed to send to us a copy of your privacy policy once this is available and publish this on your website, and to include a hyperlink in your online CHP for the contact webform on your website.

Yours sincerely

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**Marcus Clements** 

# Complaint handling procedure



**Operated by West Midlands Trains** 

## **Complaint handling procedure**

#### Making progress together

Welcome to West Midlands Trains, the new operator of the West Midlands Railway and London Northwestern Railways franchises. We will be launching two new brands which will begin to appear on the network. This first edition of our Complaint handling procedure is designed to help provide you with information about the ways in which you can contact us when travelling on either of the two franchises.

#### **Introduction to West Midlands Trains**

Welcome to the beginning of a new era for the region's railway. On behalf of the team at West Midlands Trains, who will be delivering your daily train service over the next nine years, we are delighted about the transformation we're planning to bring to your railway.

You'll see two new brands on the franchise, depending on where you travel which support the region's values and heritage.



West Midlands Railway will be dedicated to providing local rail services in and around the West Midlands. We will be working closely with West Midlands Rail (a partnership of West Midlands local authorities) to ensure we deliver on our promises.



London Northwestern Railway will be the brand for services between the Northampton and London Euston (including local branch lines) and for long distance services along the West Coast Main Line.

For both of these, we will have separate websites and ways of contacting us. These are all provided in this document. On page 15 you can see the network map for both franchises which should help you better understand any changes.



**Operated by West Midlands Trains** 

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## 1. Customer complaints handling procedure

#### 1.1 Introduction

This document defines the procedure that all our employees are expected to adopt when dealing with customer complaints.

A complaint is defined as any expression of dissatisfaction by a customer or potential customer about service delivery or about company or industry policy.

The procedure is subject to approval by the Office of Rail and Road (ORR) in accordance with Section 6 of our GB Passenger SNRP and Station Licence. In accordance with this licence condition, we will consult with Transport Focus and London TravelWatch annually on the procedure and any amendments made subsequently (see section 9.2 for their contact details).

The information necessary to enable customers to comment on our services and facilities will be published at each station managed by either West Midlands Railway or London Northwestern Railway, as well as its trains and timetable publications, plus the website. In addition our Social Media team will direct customer enquiries appropriately or customers may access an easy to use document via our website. Details of this Complaint handling procedure is available to customers on request from our Contact Centre.

We believe that all customer feedback should be seen as constructive and should be used to maintain and, wherever possible, improve the service and products offered. We will ensure that the process for contacting us is easily accessible, well publicised and easy to use.

We use traditional and innovative channels to collect qualitative and quantitative data to drive customer-focused improvement. The systems that we use to receive and process all customer contact has ways of categorising each customer contact, whether that be through Social Media, written complaint or over the phone. This categorisation enables WMT to direct investigations to the appropriate people in order to provide the information for the response. This enables interventions to be put in place as preventative measures and feed into the cycle of continuous improvement.

The data we gather from customer satisfaction research/surveys, National Rail Passenger Survey, online/in person customer panels, our Stakeholder Equality Group and managers' and 'Meeting the Customer' sessions is the way we can truly understand whether our customers are satisfied. All of this data is then fed into a Customer Experience Board who use these insights to inform strategy, make decisions and ensure continuous improvement. Our staff performance is measured on an individual basis and uses any appropriate insights to properly understand future training and development needs. We believe that by involving our people in improving the Franchise, we will all deliver increased customer and stakeholder engagement, trust and advocacy.

#### **1.2 Principles**

We will reply to all complaints, comments and claims in a timely and helpful way, addressing each substantive issue raised and acting to put problems right.

All complaints and claims will be dealt with in accordance with our Passengers' Charter. The Passengers' Charter can be found on both the West Midlands Railway and London Northwestern Railway websites: **westmidlandsrailway.co.uk Iondonnorthwesternrailway.co.uk** 

We will ensure that all our customer service employees who come into daily contact with customers are competent in dealing with customer complaints, acting wherever possible to resolving the complaint, referring complaints to our Contact Centre or to higher authority only when this is not possible. All employees will receive training and coaching in order to achieve the correct level of capabilities and competencies to do their job.

#### 1.3 Confidentiality

We will respect confidentiality in line with the Data Protection Act. However, we want to ensure that we handle every complaint in a timely manner. If you contact us but your complaint relates to the goods or services of another train operating company then we will send your complaint on to them in a timely manner. We will let you know when we send it on and supply contact details for the train operator concerned.

We may divulge some or all of these details to a third party without consent where it is necessary for us to fulfil our own obligations or to assist our Debt Recovery and Prosecutions Unit and / or the police in carrying out their statutory duties.

In accordance with our policy and the Data Protection Act any action taken against an employee as a result of an investigation will remain confidential.

You can view our Privacy Policy on our website.

## 2. The train service offered

We operate West Midlands Railway and London Northwestern Railway franchises. We run trains from as far up as Liverpool, through the West Midlands and down through Northampton to London, serving Northampton, Milton Keynes, Watford and many others.

## 3. The Contact Centre

The Contact Centre is responsible for handling all enquiries and complaints received from customers by telephone, letter, web form and by using the prefix 18001 for Textphone and minicom users.

Textphone users will not be charged additionally for using the Typetalk service and standard call rates will still apply to any Textphone calls.

#### **Opening times:**

Monday to Friday 07:00 – 19:00 Saturday and Sunday 08:00 – 16:00 Bank Holidays 08:00 – 16:00 Closed Christmas Day and Boxing Day

There is a recorded message service outside of these hours which provides callers with the National Rail Enquiries telephone number for urgent enquiries. There are also other opening times for different services offered.

Customers should note that all calls to our 0333 number are charged at the same rate irrespective of your call being from a landline or mobile telephone.

You can contact our team at the Contact Centre using the information provided below.

#### West Midlands Railway

Website westmidlandsrailway.co.uk

Twitter **@WestMidRailway** 

Delay Repay applications by post Freepost WEST MIDLANDS RAIL DELAY REPAY

Complaints by email through our 'Contact us' page

Complaints and enquiries by post Freepost WEST MIDLANDS RAIL CUSTOMER RELATIONS

Contact centre **0333 311 0039** 

Passenger Assist bookings 0800 024 8998

Passenger Assist bookings - Text Talk Pre fix 0800 024 8998 with 18001

#### London Northwestern Railway

Website Iondonnorthwesternrailway.co.uk

Twitter @LNRailway

Delay Repay applications by post Freepost LONDON NORTHWESTERN RAILWAY DELAY REPAY

Complaints by email through our 'Contact us' page

#### Complaints and enquiries by post Freepost LONDON NORTHWESTERN RAILWAY CUSTOMER RELATIONS

Contact centre **0333 311 0006** 

Passenger Assist bookings 0800 024 8997

Passenger Assist bookings - Text Talk Pre fix 0800 024 8997 with 18001

#### 3.1 Other ways to contact us

You can visit our website or make contact with our social media team.

Any complaints requiring a full or more detailed and personal response will be sent to the Contact Centre. We know that Social Media is used by our customers to seek a response to issues that are seen to require a quicker response. Our Social Media team are trained to assess these issues quickly and provide the customer with an appropriate mechanism in which to resolve problems as quickly as possible. Alternatively our Social Media team may send you a link so you can get in touch with the Contact Centre team. Details of where they can be found are provided in the table above.

You can also contact us using details found in a variety of places;

- Local telephone directories, all marketing literature, including customer magazines.
- On 'Station Information' posters displayed at all stations managed by us which will show the address, telephone numbers of the Contact Centre and the contact details of Transport Focus and London TravelWatch.
- At stations managed by us or other train operators. The contact details of all train operators will be displayed.
- On posters in every carriage of each train of our train fleet which will provide the address and telephone number of the Contact Centre and the contact details of Transport Focus and London TravelWatch.
- Within the West Midlands Trains Passengers' Charter.

## 4. Methods of comment/complaint

#### 4.1 In person

If a customer wishes to comment or complain they are encouraged to speak to an employee whether at a station or on a train. The employee is expected to try to resolve a problem immediately, with a reasonable degree of discretion, wherever possible. In some cases our employees may need to refer the customer to a local supervisor or manager. If the customer-facing person is a contractor (e.g. a cleaner) they will provide the customer with the contact details of the Contact Centre.

If the customer is still dissatisfied or further investigation is required, then our employees will either tell the customer how to contact the Contact Centre or help the customer complete a customer comments/complaints form, which will then be forwarded to our Contact Centre.

At stations which are not managed by either West Midlands Railway or London Northwestern Railway, customers may approach any Train Operating Company employee to comment or complain. If the nature of the complaint or comment makes it necessary, a process of referral to us has been agreed with other train operators.

Providing us with key information helps us resolve matters more promptly and bring matters to a conclusion more swiftly. When you get in touch please let us know the date you travelled, the time of travel, the stations used and any other relevant information you may have.

We also have "Meet the Customer" sessions with some of our senior team to engage directly with you to better understand your needs. We value the feedback we get and see these face-to-face sessions as a key way of hearing what is important to our customers.

#### 4.2 Direct and indirect contact in writing or by telephone

Customers may make direct contact with us by using our website or by writing, by telephone to our Contact Centre. Customers may also contact us using the webform available on the website. The contact details are provided in the Contact Centre section. Correspondence received by the Contact Centre will be registered on the database and dealt with in the order in which it is received. The details of customers may also be forwarded to the Contact Centre by other train operating companies, Transport Focus or London TravelWatch and by National Rail Enquiries in order for us to fulfil our obligation to respond to you. This may happen if a journey involves more than one train operator or if your case is escalated to Transport Focus or London TravelWatch.

We have a Social Media team to provide useful information and support customers. We recognise that many customers might contact us via social media to provide feedback or complain. In order to make sure matters are dealt with and investigated properly, our social media team will provide our customers with as much information during the engagement as they can. In many cases, this will satisfactorily resolve an issue. However, if the nature of the issue is one which quite clearly cannot be resolved this way (eg concerns about customer service or potential 'delay repay' cases) our team will provide details of our Contact Centre to enable further actions, investigation or a thorough response. If in doubt, the team will ask if the customer wishes to raise a complaint and will be advised of the process.

#### 4.3 By customer comments/complaints form

Customer comments/complaints forms are available on request from all our ticket offices as well as other train operating company ticket offices within the area where we operate. Where a member of staff is on board your train, they can provide you with a form. Customers can also complete this form online to avoid postage.

The customer comment form allows customers to express their personal comments or complaints. The form can be handed in at any of our station ticket offices or can be posted to the Contact Centre at the Freepost address shown on the reverse of the form. These forms will also display the contact details for Transport Focus and London TravelWatch.

#### 4.4 Customers with additional needs or whose first language is not English

We are happy to correspond with our disabled customers via their preferred means of communications (eg telephone, letter).

For customers who use Textphone or Minicom services, please prefix your call through to our main advertised number with 18001 to communicate with Typetalk services during the times that our Contact Centre is open. Opening times of our Contact Centre are detailed on our website(s) and section 3 of this booklet.

Where a customer whose first language is not English contacts the company, we will translate outgoing correspondence into their first language to improve communication.

We recognise the need for carers, support assistants and guardians to advocate on a customer's behalf with their permission. In order to respect the customer's data protection and confidentiality rights, we will need to be satisfied that the customer provides consent and may ask for evidence of this. This will not prevent us from ensuring that any necessary investigations are made. All our employees receive appropriate training and understand the need to be flexible to ensure everyone can fairly access the complaints process and contribute their ideas and feedback for improving our service.

We can also provide documentation to you in printed copy, large print and audio formats within 7 working days of your request. For any other alternative formats, please contact our team at the Contact Centre who will be at hand to help. See Section 9.3 for more information on our Disabled People's Protection Policy.

## 5. Response

#### 5.1 Normal response

We will answer 95% of comments and complaints within 20 working days and sets a target of 90% to be answered in 10 working days. You will be provided with a unique reference number to log, monitor and track the resolution of the complaint. In accordance with our Passengers' Charter (see our websites), if a complaint cannot be resolved at the time and has entered the formal system, then an acknowledgement will be sent to the customer within five working days. We will make reasonable endeavours to ensure we meet our response times even when there is an unexpected increase in the volume of complaints received. However if there are exceptional circumstances, such as a period of major disruption, we may increase these response times. We will work closely with Transport Focus and London TravelWatch if our response times are extended. We will also ensure we advise the ORR when we anticipate an increase to response rates. We will notify customers via our website and direct correspondence if this is the case, whilst making every effort to respond to you as soon as we can.

Our objectives are:

- To provide a response which is easy to understand.
- To fully investigate all complaints in a sympathetic, fair, timely and courteous manner.
- To provide consistency in approach throughout the company when responding to customers.
- To use the feedback received from customers in a positive way to help improve the service offered.

We will only consider a complaint as one which has been resolved when we have no outstanding actions to perform.

#### 5.2 Complaint escalation procedure

When a customer is dissatisfied with an initial response and they contact the Contact Centre again, the complaint will be referred to a senior person who has not previously been involved in the case to undertake a review of the complaint. A response will be provided within 20 working days, but we will always endeavour to review and respond as soon as possible. We will provide our customers with contact details for London TravelWatch and/or Transport Focus in our second substantive response, irrespective of the outcome of the complaint or our response. Where a complaint is referred to us by either Transport Focus or London TravelWatch, a further review in consultation with Transport Focus or London TravelWatch will be undertaken by a dedicated person within 20 working days. For further escalations from this point you can ask Transport Focus or London TravelWatch for help and advice. Transport Focus is an independent body in place to protect and represent passenger transport users. London TravelWatch operates similarly for transport users in and around London. Contact details and further information about customer dissatisfaction is provided in Section 9.

#### 5.3 Investigation

The Contact Centre will arrange a full and fair investigation of a customer's complaint wherever necessary. We will investigate all complaints thoroughly, seeking clarification from you when necessary.

Please include as much information in your complaint as you can, for example;

- Your contact details;
- Date and time of your journey;
- Copy of your ticket or proof of travel (where applicable); and
- All relevant facts to help us understand the problem and investigate.

Once we understand the key issues, we will identify facts that need to be checked. We will collect evidence and interview employees if required. Our objective analysis will include a review of all relevant policies and procedures. We will form a fair and unbiased view about what the customer should have expected and what happened in practice.

We will give you a full explanation and, where appropriate, an apology. If your complaint includes more than one issue, we will deal with each one this way. We log every complaint with a unique reference number on our database. This means that we can keep track of our progress in dealing with your complaint, and check that we're keeping to our targets for response time. We will also ensure that the right people within our business investigate to help us resolve a complaint and to make sure that we work to prevent a reoccurrence in the future.

If detailed investigations are required, we will let you know if there is a delay and keep you updated but will endeavour to adhere to our normal timing commitments wherever possible (see Section 5.1).

#### 5.4 Frivolous and vexatious complaints

We reserve the right to terminate any correspondence or communication that we reasonably deem to be abusive, bullying, repetitive, frivolous or vexatious, and which specifically diverts resources and affects key areas of the Contact Centre. This decision will be made by our Contact Centre Manager. We will provide the customer with contact details for Transport Focus and/or London TravelWatch. We will consult the DfT and Transport Focus or London TravelWatch before we terminate any correspondence and we will advise the customer in writing of the reasons behind the decision.

## 6. Redress/compensation

Where a complaint relates to a delay we will ensure that our response provides details of compensation arrangements and how to claim.

#### 6.1 Forms of recompense

Forms of recompense will normally be made using one of the following methods

- Amazon Account Top up and E Vouchers
- Credit or debit card
- PayPal
- Cheque
- Donation to The Samaritans
- Rail Travel Vouchers

We will comply with the Consumer Rights Act 2015.

#### 6.2 Individual claims

Individual claims for recompense will be dealt with in line with the National Rail Conditions of Travel and West Midlands Trains Passengers' Charter, taking into account such factors as the nature of the complaint, the fare paid and any other extenuating circumstances. The National Rail Conditions of Travel can be found on both our websites. When we get back in touch with you, we will let you know if you have an entitlement to compensation and ensure that this is paid to you.

#### 6.3 Minimum levels

The commitments within the West Midlands Trains Passengers' Charter will determine the minimum level of recompense.

## 7. Handling claims

Claims for losses, property damage or personal injury should be made in writing to our Contact Centre who will acknowledge it within five working days and ensure it is forwarded promptly to our Contact Centre. Claims will then be dealt with in accordance with the Claims Allocation and Handling Agreement (CAHA) – more detail can be found in the National Rail Conditions of Travel.

#### 7.1 Lost property

There is nothing worse than leaving things behind. We want to reunite our passengers with their lost or mislaid items as quickly as possible. If you think that you've left something on one of our trains or at one of our stations, contact us and we'll search all of the items handed in. To report a lost item either:

- Use our online lost property contact form
- Call our Lost Property team by calling our Contact Centre number and speak to an advisor.

0700 – 1900 Monday - Friday

0800 - 1600 Weekends & Bank holidays

Closed Christmas Day & Boxing Day

When you report a piece of lost property, there are a few things that will help us try and track down your things. The following details would therefore be really useful:

- Your departure and destination stations;
- The time of your journey;
- A good description of your lost item including size, colour, make and any distinguishing features;
- Where on the train you left the item;
- Your name and contact number

See our websites for more details.

## 8. Complaints relating to other operating companies

#### 8.1 Individual train companies

Complaints referring or relating to another train company will be acknowledged in the normal way. The customer will be advised that their comments have been sent on and a contact address will be given. The correspondence will be forwarded to the relevant company within five working days of receipt for them to respond directly.

#### 8.2 Several train companies

If your complaint involves several other rail companies or Network Rail, we will send your complaint to them and ask them to get in touch and we will let you know when we have done that.

If your complaint involves a journey that features more than one rail company, we will liaise with the other companies involved to ensure you receive a co-ordinated response.

#### 8.3 Other third parties

If complaints relate to other transport providers (eg a bus operator) we will explain this in our reply to you and provide the contact address you need. If you ask us to do so, we will forward your complaint to them directly. If the complaint refers to another non-transport organisation, we will also explain this in our reply and try to provide you with the contact address you need. If you make a complaint which relates to a third party supplier who is acting on behalf of us (eg car park management, web support or suppliers of rail replacement services) we will work with the provider to thoroughly investigate the details of your complaint and co-ordinate a response accordingly.

## 9. Customer satisfaction

#### 9.1 Statistical feedback

Statistical feedback is taken from several sources, including 3rd Parties who provide services on our behalf. The information taken from all sources is shared with our Leadership and Customer Service team on a weekly basis and will be provided every four weeks to our Executive Group. A category will be included to show the numbers of customers dissatisfied with the initial response given. Feedback will also be used at specific Customer Service improvement groups and may be shared with the Passenger Panels.

#### 9.2 What happens if you are not satisfied with us?

We will do everything possible to ensure we deliver a high standard of service and respond to your needs and will adhere to the National Rail Conditions of Travel and our Passengers' Charter. However, if you are not happy with our response, you can contact Transport Focus or London TravelWatch, the independent passenger 'watchdogs', who will review your case and – if they consider it appropriate – follow things up with us on your behalf.

Alternatively you may wish to raise your complaint through the Alternative Dispute Resolution Service (European Commission Online Dispute Resolution Platform). This web-based platform aims to help consumers and traders resolve disputes about goods or services purchased online. They can be contacted using their website via www.ec.europa.eu/consumers/solving\_consumer\_ disputes

We have agreed to abide by a protocol with London TravelWatch and Transport Focus to ensure that we are agreed in our expectations of how an appeal will be managed by us, including the speed of response so that resolution for the customer is timely.

The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulation 2015 requires us to advise you of an 'Alternative Dispute Resolution' organisation for your complaint. In our case this is The Consumer Ombudsman consumerombudsman.org. However, as Transport Focus and London TravelWatch already provide a mediation service for customers in the rail industry, we do not make use of the ADR process and correspondence to the Consumer Ombudsman will be redirected to Transport Focus or London TravelWatch.

We cannot handle penalty fare appeals. Please contact IRCAS (see Section 9.3 for contact information).

#### **Transport Focus**

You can contact Transport Focus about any issue, except relating to services made wholly in the West Midlands.

Website: transportfocus.org.uk

Email: advice@transportfocus.org.uk

Telephone: 0300 123 2350

Twitter: @TransportFocus

Transport Focus FREEPOST RTEH-XAGE-BYKZ PO Box 5594 Southend-on-Sea SS1 9PZ

#### London TravelWatch

You can contact London TravelWatch about any issue that you have on journeys made from stations between Tring and London, including St Albans Abbey to Watford.

Website: londontravelwatch.org.uk

Email: enquiries@londontravelwatch.org.uk

Telephone: 020 3176 2999

London TravelWatch 169 Union Street London SE1 0LL

#### 9.3 Other useful information

#### **Penalty Fares**

If you have received a Penalty Fare notice please refer to the appeals body detailed on the notice. You can find contact details and how to appeal or pay a notice at www.penaltyservices.co.uk or write to:

Penalty Services Ltd, 9 Deben Mill Business Centre, Old Maltings Approach, Melton, Woodbridge, Suffolk, IP12 1BL

Full details of our policy can be found on our websites.

#### **Disabled People's Protection Policy**

You can find more information on our policies for supporting disabled customers and practical information on planning your journeys on our website on the 'Accessibility' page. Please contact our Contact Centre if you require these in alternative formats by post.

#### **National Rail Conditions of Travel**

These can be found on National Rail's website in a variety of formats at www.nationalrail.co.uk

## 10. Review of procedure

#### 10.1 Transport Focus or London TravelWatch

Our customer complaints procedure will be formally reviewed annually with Transport Focus or London TravelWatch, or at any time on request of the ORR.

#### **10.2 Alterations**

The procedure will not be altered without prior consultation with Transport Focus or London TravelWatch, and prior agreement from the ORR.

### 11. Network map

