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To passenger licence holders,  
respondents to the consultation [by email], and other  
interested parties

Dear Stakeholder,

## **Changes to Complaints Handling Guidance – decision letter**

This letter sets out our decision following a consultation into proposed amendments to the Complaints Handling Procedures (CHP) guidance to facilitate the introduction of an Alternative Dispute Resolution (ADR) scheme in the rail sector.

On 26 September 2016 we published a consultation on our proposals to amend the CHP guidance. We sought views in the following three areas:

- whether consumers should be signposted directly to the ADR scheme or via the existing consumer bodies;
- the timing for communicating to consumers that they have an option to go to the ADR scheme; and
- whether we should require membership of an ADR scheme.

Our decision is that:

- **consumers should be signposted directly to the ADR scheme;**
- **the time limit for signposting should be eight weeks; and**
- **we are minded to modify the complaints handling licence condition to require membership of an ADR scheme within six months of scheme commencement and will consult on doing so.**

In this document we provide a high-level summary of the views of those who responded to our consultation together with our response and next steps.

We received 31 replies to the consultation; 16 from rail companies, two from the statutory consumer bodies, eight from independent organisations, and five from individual consumers. We thank all those who responded. We list these at Annex C and have published non-confidential responses on our website.

## 1. Background

Where consumers are unable to reach a satisfactory outcome to their complaint, it is important that they can get redress in a way which is independent of the company. Research has shown that there is a wish on the part of consumers to have greater access to independent redress arrangements, and ORR's satisfaction research has identified that while performance across companies varies, there is generally a high level of dissatisfaction with rail companies' handling of complaints.

The statutory consumer bodies Transport Focus and London TravelWatch currently act as the appeals bodies for complainants who are unhappy with a rail company's response to their complaint. However, they have no formal powers to compel rail companies to act or compensate individual passengers and the only form of binding outcome for passengers is through the Courts (usually via the Small Claims Court).

The previous Rail Minister had been leading discussions regarding the introduction of voluntary binding ADR in the rail sector which builds upon the current advocacy arrangements. Rail Delivery Group (RDG), working with Transport Focus, London TravelWatch, and ORR as part of an Ombudsman Task Force, has developed proposals which they envisage will see an ADR scheme for rail passengers introduced on a voluntary basis by industry.

RDG's proposals have been developed with passenger rail companies and they envisage that these will be the initial members. Charter operators and station licence holders have not been involved to date, although discussions continue with Network Rail regarding its participation.

RDG propose to seek approval under the ADR Regulations for the ADR scheme from the relevant Competent Authority (in regulated sectors Competent Authorities are the Financial Conduct Authority, Legal Services Board, Civil Aviation Authority, Gambling Commission, Ofgem, Ofcom, and the Chartered Trading Standards Institute (CTSI), which certifies all schemes outside of these sectors). ORR is not a Competent Authority so an ADR scheme in the rail sector would fall to CTSI to approve.

On 26 September 2016 we published a consultation<sup>1</sup> on our proposals to amend the CHP guidance to facilitate the introduction of an ADR scheme.

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<sup>1</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0018/25623/changes-to-complaints-handling-guidance-consultation-2017-09-26.pdf](http://orr.gov.uk/_data/assets/pdf_file/0018/25623/changes-to-complaints-handling-guidance-consultation-2017-09-26.pdf)

## 2. Consultation questions, responses, and our decision

### 2.1 Chapter 1 – Signposting unresolved complaints

In Chapter 1 of our consultation we set out three options for inclusion in the CHP guidance of the appropriate organisation to which consumers should be signposted (the process of giving consumers information about independent assistance) if the rail company is unable to resolve the complaint to their satisfaction.

- Option 1 - Signposting to the ADR scheme
- Option 2 - Signposting to the ADR scheme, and to Transport Focus and London TravelWatch
- Option 3 - Signposting to Transport Focus and London TravelWatch

We also explored the content of these communications to consumers.

#### i. Consultation question

- Which of the three options set out above is most appropriate for signposting to ADR?

#### Summary of responses

There was large support amongst **rail companies** for option 1. Respondents noted that this option would provide a seamless path to the scheme, be simple for consumers to understand and use, and would generate confidence in the independent body. To them, options 2 and 3 were more complex for the train company and the consumer. The need for effective communication between the current consumer watchdogs and the ADR scheme to ensure consumers are aware of who is handling the complaint was highlighted as important. One respondent suggested that a single co-ordinated response be provided where the complaint has a number of aspects, some of which fall to one organisation and some to another. One respondent supported option 3 – signposting to Transport Focus and London Travelwatch – which they considered would provide a further opportunity to achieve resolution prior to referral to ADR.

Amongst the two **statutory consumer bodies**, there was support for both option 1 and option 3. One respondent considered that there are pros and cons to each of the three options. It noted that there would still be cases which fall outside of the ADR scheme and some complaints where some aspects fall to the ADR scheme and other aspects to the statutory body. On balance it favoured option 1. The other respondent favoured a continuation of the current arrangements prior to referral to ADR - option 3 - noting the

advantage of utilising existing experienced staff and the possibility that the backstop of ADR will incentivise acceptance of resolutions proposed by the consumer bodies.

The majority of respondents from **independent organisations** favoured option 1. They noted the importance of providing easy, direct access to the ADR scheme but also that a protocol would be necessary for referring complaints from the scheme to the statutory consumer bodies. They also commented that option 2 might undermine trust and option 3 would risk high complainant drop-out as the process would be lengthened. There was limited support for option 2, with the concern expressed that consumers using option 1 may feel misled if their complaint was passed on. One respondent supported option 3.

Of the **individual consumers** who responded to this question, there was support for both option 1 and option 3, the latter citing the use of existing experienced staff and the possibility that the backstop of ADR will incentivise acceptance of resolutions proposed.

#### ii. Consultation question

- Are there other approaches that we have not considered which may be preferable to those set out above?

#### Summary of responses

There were very few alternative approaches suggested by respondents. One **rail company** considered that the use of the statutory consumer bodies could be encouraged where the consumer is willing to provide an opportunity to resolve the complaint without additional cost. Responses from **independent organisations** included a proposal for a system to be developed which would provide for earlier intervention either to prevent the issue becoming a complaint or when it has, to resolve it via conciliatory means. One respondent noted that it would be preferable to be able to identify from the outset whether the complaint was in/out of scope of the ADR scheme.

#### iii. Consultation question

- Is it necessary for ORR to set out in detail our expectations, and make these formal requirements, in the CHP guidance of communications about the ADR scheme?

#### Summary of responses

**Rail companies** noted the need to ensure consistency in messaging to consumers. With the exception of one company, there was no support for the inclusion of detailed requirements in the CHP guidance. Instead, there was a desire to ensure that companies

followed best practice either through ORR dissemination or companies working together or with the ADR body.

Of the **statutory consumer bodies** who responded to this question, the need to be clear in the signposting letter that the complaint may deal with issues outside the scope of the ADR body was noted. Consideration would need to be given to wider publicity about the scheme such as posters and online information, and clarity given as to who is party to it.

There was widespread support from **independent organisations** for ORR to provide clarity on its expectations for communicating with consumers about the scheme. There was concern expressed that without specific minimum requirements, promotion and clear and consistent messaging about the scheme would not be incentivised. One respondent added that these should not be so prescriptive to reduce the opportunity for innovation.

Some **individual consumers** expressed concern about the industry's compliance and suggested therefore that obligations should be placed on rail companies.

#### ORR decision

**Our decision is that consumers should be signposted directly to the ADR scheme; option 1.** This will ensure that access to the ADR scheme is simple and easy for consumers to understand and reduce the possibility of consumers dropping out of the process. Where cases fall outside of the scope of the ADR scheme we would expect the ADR body and the statutory consumer bodies to agree a transparent protocol for referral.

It is important to ensure that consumers are given the key information they need about the ADR scheme. This needs to be in language which is clear and understandable and is not in itself a barrier to access. **Our decision is that these communications (letters or emails) should include details about the following:**

- the consumer has the right to go to the ADR scheme;
- it is independent and free of charge;
- the possible outcomes include an apology; an explanation of what went wrong; a practical action to be taken to correct the problem; and a financial award;
- its decision has to be accepted by (is binding on) the rail company but not the consumer; and
- communications should be personalised and the terminology and tone appropriate.

We would expect rail companies to draw on the expertise of the statutory consumer bodies, the ADR scheme, and relevant external material<sup>2</sup> as well as utilising consumer feedback when developing communications.

## 2.2 Chapter 2 – Timescale for sending signposting letters

In this chapter we set out options for inclusion in the CHP guidance of the appropriate period of time rail companies should have in which to resolve complaints before the complainant is informed that they have the option of referring their complaint to the ADR scheme.

- Option 1 - Signposting at eight weeks
- Option 2 - Signposting at six weeks or less

### iv. Consultation question

- What is the most appropriate point at which to signpost ADR? Eight weeks, six weeks, another period?

### Summary of responses

Nearly all **rail companies** supported signposting to ADR at eight weeks, which they noted was common to other sectors. Two respondents noted the difficulty in ascribing a time limit when the consumer's response time to correspondence was unknown or where there was a backlog in complaints. This prompted a suggestion that the CHP guidance should include a timescale by which consumers should be expected to respond. The interaction of the company's current ability to 'stop the clock' when they are waiting for the consumer to reply with signposting at eight weeks where the timescale is absolute was questioned by some, and there was a request that time and cost of changing systems to accommodate this was recognised.

From the **statutory consumer bodies** there was support for both eight weeks and six weeks. One suggested eight weeks but expressed concern should this become the norm for all cases rather than more complicated ones. Support from the other body for six weeks was based on minimising the impact of a lengthy appeals process.

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[https://www.ofgem.gov.uk/sites/default/files/docs/2014/12/2014\\_19\\_03\\_ose\\_8wk\\_deadlock\\_letter\\_guidance\\_5dec2014\\_0.pdf](https://www.ofgem.gov.uk/sites/default/files/docs/2014/12/2014_19_03_ose_8wk_deadlock_letter_guidance_5dec2014_0.pdf)

Timescales advocated by **independent respondents** ranged equally between eight weeks and six weeks. One respondent who suggested the former also proposed signposting when the complaint is received and again at both six and eight weeks to reduce the likelihood of consumers dropping out of the process. Those who proposed eight weeks thought this was appropriate whilst suggestions for six weeks noted that the current process was too slow. Another respondent proposed a period of four weeks for signposting noting its use by the Scottish Public Services Ombudsman and suggested that it would increase trust and confidence.

Of the **individual consumers** who responded, one supported signposting at six weeks, the other at four weeks with both noting that this is sufficient time to consider the complaint.

#### v. Consultation question

- Should we conduct a review of whatever time period is agreed? If so, at what point; after one year, two years, another period?

#### Summary of responses

**Rail companies** largely agreed that the timescale for signposting should be reviewed. Suggestions ranged from one year and then annually or bi-annually thereafter, to two years. Some respondents suggested that the review should include the financial impact on rail companies of the signposting arrangements.

The **statutory consumer body** who responded to this question considered after one year to be an appropriate period for review. Responses from **independent organisations** was mixed with suggestions of one year, two years, and not at all as appropriate periods for review. Of the two **individual consumers** who responded, one proposed a period of after one year whilst the other favoured a review only if its purpose was to reduce the time limit.

#### vi. Consultation question

- If the time period should be subject to review, what metrics should we use to establish whether the time period remains appropriate or should be changed?



## Summary of responses

The main suggestions from **rail companies** focussed on the number of letters sent at eight weeks and where the case has become deadlocked<sup>3</sup> together with collecting the reasons for referral to identify whether there were any particular issues driving cases. There was also a wish to capture the time taken by consumers to respond to rail companies. Customer satisfaction was cited by some respondents as a good measure, including the use of the existing complaints satisfaction survey, and comparison with other sectors.

**Statutory consumer bodies** suggested that the number and type of complaints closed by week could be used, and outstanding cases examined for common factors. **Independent organisations** proposed drawing upon the experience of consumers such as awareness of ADR across those who had and had not complained, as well as statistical measures including the time taken to resolve and the proportion of unresolved complaints referred to ADR. **Individual consumers** proposed seeking consumer feedback possibly via a survey, and collecting the proportion of complaints closed within weekly bands and an examination of unresolved complaints.

### vii. Consultation question

- Should individual rail companies be able to set their own signposting time limits as long as they are below the minimum agreed signposting standard?

## Summary of responses

There was some support amongst **rail companies** for setting their own signposting limits below the agreed minimum standard though some suggested that this be considered further once the scheme is established or after any review. It was noted that the companies own stricter timescales and earlier deadlocking of complaints offered a reduced timescale. Other respondents expressed concern about possible consumer confusion and inconsistency in practices.

The **statutory consumer body** who responded to this question had no objection to allowing rail companies to set their own time limit below the standard.

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<sup>3</sup> Where the rail company becomes aware before reaching the requisite time limit for signposting that it is unable to resolve a complaint to the consumer's satisfaction.



Amongst those who responded, **independent organisations** were largely in favour of rail companies being allowed to set their own limit below the agreed standard suggesting that it could be a differentiator. However, one suggested that any lower limit should be kept as an internal company measure to avoid consumer confusion. One respondent suggested that all companies should adhere to the same standard time limit.

Of the two **individual consumers** who responded to this question, one noted that consistency was beneficial for consumers whilst the other suggested that a reduced limit could be advantageous for the individual company and attract praise.

#### viii. Consultation question

- Should arrangements be introduced to allow signposting before the time period is reached i.e. deadlock?

#### Summary of responses

**Rail companies** were in favour of deadlocking complaints noting that many disputes were currently resolved before the proposed signposting point would be reached anyway. There was agreement across **all other respondents** to allow rail companies to signpost to the ADR scheme when deadlock is reached.

#### ORR decision

**Our decision is that consumers should be signposted to the ADR scheme no more than eight weeks after the complaint has been received.** In so doing, we recognise that ADR is a new feature in the rail industry and a maximum period of eight weeks is common in many regulated sectors. Nonetheless, we are keen to ensure that consumers are able to access ADR promptly and do not disengage from the process. Therefore, **we will review whether this period remains appropriate after the first year of the scheme's operation.**

To inform our thinking for the review, from the start of the scheme we will collect data from rail companies on the volume of eight week and deadlock letters sent. We will also draw on existing information such as the volume of complaints resolved within 10 and 20 working days, and the complaints satisfaction survey. In the meantime, **we have no objections to rail companies setting their own time limits for signposting consumers to the ADR scheme as long as this is less than eight weeks.**

There will be occasions when it becomes clear before reaching eight weeks that the complaint cannot be resolved. In such circumstances it is not in either the rail company's

or consumers interests to wait until the eight week period is reached before signposting to the ADR scheme. **Our decision is that such complaints should be declared to be deadlocked by rail companies and the signposting letter sent before the eight week period is reached.**

The requirement to signpost after eight weeks is absolute and does not allow companies to take into account any period of time where they are waiting for the consumer to reply to any communication from the company (known as 'stopping the clock'). As such, there is a conflict with the allowance made in our core data reporting for this activity when calculating complaints handling response rates within 20 working days. We are concerned that 'stopping the clock' may not be best practice in complaints handling. Therefore, we intend to look at complaints handling practices in other regulated sectors to determine, amongst other considerations, whether the ability to 'stop the clock' should continue. We will discuss further with rail companies the impact and timing of any change in this, and any other areas, once we have completed this review.

### **2.3 Chapter 3 – Requirement to be a member of an ADR scheme**

In this chapter we considered whether it is necessary for membership of ADR to become a requirement in the rail companies licence. We also asked for views on whether all rail companies should be members of an ADR scheme rather than just those who are members of RDG.

#### ix. Consultation question

- As substantial progress has been made voluntarily by industry on developing an ADR scheme, is it necessary to make membership of an approved ADR scheme a requirement in the licence (and reflected in CHP guidance and CHPs)?

#### Summary of responses

With the exception of one respondent, **rail companies** were in favour of membership of the ADR scheme being on a voluntary basis. Some cited the good progress that had been made to develop the scheme by industry, and expressed concern that action to introduce a licence condition would have impacts on DfT and ORR and could delay implementation of the scheme. There was a suggestion that the extent of voluntary membership should be assessed before deciding whether to mandate membership. One respondent felt that all companies should be members and that ORR should enforce this, and questioned the effectiveness of the scheme if this did not happen.

The **statutory consumer bodies** noted the progress that has been made by industry. One favoured an approach which made it clear to rail companies that if full membership could not be achieved voluntarily then they would be required to join. The other supported membership being required in the future to guard against companies withdrawing from the scheme.

With the exception of one respondent, **independent organisations** supported compulsory membership of an ADR scheme either via regulation or licence requirement. Concern was expressed about the possible confusion amongst consumers if ADR was not compulsory and the inability to hold companies fully to account. The lack of market incentives to join was noted, particularly where a company was performing poorly and creating the most consumer detriment. The threat to the independence of decision making and enforcement of decisions was also highlighted as companies could withdraw from the scheme. There was a need expressed by one organisation to limit the number of ADR schemes in the sector to one. One respondent considered that the progress made meant that a licence requirement was unnecessary, noting the need for certainty on costs if membership was mandatory.

The **individual consumers** who responded to this question all supported membership of the ADR scheme being a requirement.

#### x. Consultation question

- Are there any other approaches which could provide certainty in the ADR arrangements for consumers?

#### Summary of responses

**Rail companies** who responded to this question noted that government could change the role of Transport Focus to allow it to be the ADR scheme provider but that the necessary changes in legislation to permit this would delay the introduction of the scheme. Other suggestions included widespread advertising of the scheme and the need for the scheme to demonstrate its value.

The **statutory consumer bodies** and **individual consumers** did not highlight any other approaches. Responses from **independent organisations** included the suggestion that ORR should have Competent Authority status but in the interim should work closely with CTSI. The scheme must be able to resolve individual complaints, improve complaint handling, and reduce the causes of complaints. Publication of data will provide transparency and drive improvements. One respondent noted that if the ADR body is an ombudsman then it must be a member of the Ombudsman Association which provides

additional independent oversight and safeguards. Another suggested that increased signposting to existing schemes would benefit consumers.

#### xi. Consultation question

- What alternative safeguards are available to ensure that rail companies do not withdraw their membership from a scheme?

#### Summary of responses

**Rail companies** noted the reputational risk of withdrawing membership of the ADR scheme. One respondent suggested that past participation in the scheme be considered as part of future franchise awards and be included as a requirement in bids. The **statutory consumer bodies** and **individual consumers** did not highlight any other approaches. One respondent from an **independent organisation** suggested that past membership be taken into account in future franchise awards.

#### xii. Consultation question

- Are there any reasons why charter operators and station licence holders should not join an ADR scheme?

#### Summary of responses

Some **rail companies** were unaware of any reasons why membership should not include other operators, highlighting the need for consistency but also that they were not sighted on the costs that they may face. Other comments included the suggestion that a risk-based approach is taken, inclusion should follow ORR's recent document on the scope of regulation for Disabled People's Protection Policies (DPPPs) and CHP<sup>4</sup>, and that it should be the subject of a separate consultation.

The **statutory consumer bodies** could not see any immediate issues with widening participation in the ADR scheme. Of the five **independent organisations** who responded to this question, all were in favour of including charter operators and station licence holders.

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<sup>4</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0018/26325/consultation-on-licence-outliers-conclusions-letter-2017-12-14.pdf](http://orr.gov.uk/_data/assets/pdf_file/0018/26325/consultation-on-licence-outliers-conclusions-letter-2017-12-14.pdf)

Of the two **individual consumers** who responded to this question, there was support for the inclusion of station operators. In the case of charter operators, one suggested that they be included whilst the other considered that it should depend on whether they are fully commercial companies or charities.

#### ORR decision

**We are minded to introduce a licence requirement that will oblige rail companies to be members of an approved ADR scheme within six months of the start of the voluntary scheme and will consult on doing so.** This would provide certainty, consistency and clarity for both operators and consumers in this important area.

If the introduction of the voluntary scheme is subject to a prolonged delay, a licence obligation could provide a backstop date to give certainty as to when membership of an approved ADR scheme will be required. **We are therefore minded to include a fixed date by when rail companies should be members of the scheme.** We would also seek to set out in the licence obligation broad principles in key areas such as signposting and transparency.

We will seek views from stakeholders and interested parties regarding the introduction of a licence requirement. **We will publish a consultation document and impact assessment this spring to explore the issues further.**

We recognise the good progress made by RDG to deliver an ADR scheme which they envisage will be in operation later this year. We welcome their intention that the scheme will meet the standards set out in the ADR Regulations and that they will seek approval from the relevant Competent Authority. Nevertheless, the scheme is constituted as a voluntary one.

Introducing a licence condition that will require membership within six months of the scheme's commencement will allow RDG and rail companies to continue with their current arrangements for delivering the ADR scheme this year. Early voluntary membership of the scheme will provide an opportunity for rail companies to address any teething issues which may arise before the obligation becomes enforceable in the licence, and to benefit from the feedback which the scheme will provide.

We know that there is a demand from consumers for access to formal ADR. For example, the survey of passengers' satisfaction with rail companies complaints handling continues

to show greater levels of dissatisfaction than satisfaction<sup>5</sup>, and the Which? consumer insight tracker<sup>6</sup> demonstrates that trust in the rail sector remains low. Early membership of the scheme will demonstrate a commitment to consumers and increase trust. Consumers will also have certainty that if there are issues that necessitate the raising of a complaint, they will be able to ultimately seek a binding outcome if the matter cannot be satisfactorily resolved.

Universal membership via a licence condition will allow the ADR scheme to look across the sector and raise industry standards. The scheme will also be expected to provide transparency and therefore comparability of performance. A licence condition will also provide consistency in redress provision and protection across regulatory sectors.

We recognise that early adopters of the scheme will be subject to certain enforceable obligations in CHP such as signposting after eight weeks which may act as a disincentive to some rail companies to voluntarily join the scheme in advance of the licence condition taking effect. Whilst we expect rail companies who voluntarily join the scheme to comply with these requirements, we acknowledge that as this is a new scheme some companies may experience difficulties embedding the necessary new processes. Therefore, we will be proactive in monitoring and ensuring compliance with requirements rather than taking enforcement action where difficulties are identified until scheme membership becomes mandatory.

We are keen that there should be consistency in ADR provision across the sector. However, responses to this consultation did not provide the clarity necessary to conclude that charter operators and station licence holders should be obliged to join the ADR scheme. Therefore, we will explore their inclusion further as part of our consultation on requiring membership of the ADR scheme via licence.

## **2.4 Chapter 4 – Clarifications to CHP guidance and changes to CHP**

In this chapter we provided clarifications to the CHP guidance not related to the ADR proposals and set out our intention to require amendments to CHPs where we consider that these are necessary, to remove any possible misunderstanding or misinterpretation of the requirements. Nevertheless, we received a small number of responses to this chapter.

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<sup>5</sup> [http://orr.gov.uk/\\_\\_data/assets/pdf\\_file/0007/26386/passenger-rail-service-complaints-2017-18-q2.pdf](http://orr.gov.uk/__data/assets/pdf_file/0007/26386/passenger-rail-service-complaints-2017-18-q2.pdf)

<sup>6</sup> <https://consumerinsight.which.co.uk/tracker/trust>

## Summary of responses

Responses centred on the requirement to signpost consumers to the statutory consumer bodies in the second substantive response (SSR) where the concern was that it may be premature to do so, and monitoring of the ADR scheme.

### ORR response

We are concerned that removing the requirement to signpost in the SSR for example requiring signposting after the SSR, may leave the obligation open-ended. We would not expect the signposting to happen in isolation; the SSR should explain what the company has done to resolve the complaint and what the consumer can do next if they are unhappy, both escalation within the company and via the statutory consumer bodies. Rail companies must continue to signpost in the SSR until they join the ADR scheme.

With regard to monitoring of the ADR scheme, we are not a Competent Authority. Therefore, as set out in the consultation document we will establish an effective working relationship with CTSI (the relevant Competent Authority) to provide effective monitoring of the functioning of the ADR scheme. We will also agree with the ADR scheme the information we expect to receive on rail company performance and ensure that there is transparency in this area.

## **3. Next steps**

- We expect rail companies to make the non-ADR related changes to their CHPs as set out in Chapter 4 of our consultation (at 4.4 and 4.12), and to submit the revised text, by 23 March 2018.
- We will agree with those rail companies who join the ADR scheme voluntarily a timetable for the changes to CHPs which will be required to reflect membership of the scheme.
- We will publish our consultation on amending the licence to require membership of an ADR scheme this spring.
- We intend to conduct a best practice review of complaints handling in other regulated sectors this spring. We will discuss the results and any proposed changes to complaints handling we draw from that review with rail companies.





Yours sincerely

**Stephanie Tobyn**

**Respondents to the consultation**

Arriva Trains Wales  
Chiltern Railways  
Cross Country  
East Midlands Trains  
First Group  
Govia Thameslink Railway  
London Midland  
Merseyrail  
Network Rail  
Northern Railway  
Rail Delivery Group  
ScotRail  
South Eastern Railway  
Tyne & Wear Metro  
Virgin Trains  
Virgin Trains East Coast  
London TravelWatch  
Transport Focus  
ASLEF  
CEOemail.com and The Complaining Cow  
Ombudsman Services  
Queen Margaret University  
Resolver  
Speedy Sticks Consulting  
Transport for London  
Which?  
John Cartledge  
Helen Cornish  
Paul Davies  
Emma Hasler  
Philip Nalpanis