

**Annette Egginton**

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

Email: [annette.egginton@orr.gsi.gov.uk](mailto:annette.egginton@orr.gsi.gov.uk)

14 June 2016

Emma Donnelly  
Customer Relations & Social Media Manager  
CrossCountry

Dear Emma

**Approval of XC Trains Limited (trading as CrossCountry) Complaints Handling Procedure (Condition 6 of the Station Licence and GB Passenger Statement of National Regulatory Conditions)**

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 station licence and GB Passenger Statement of National Regulatory Conditions (SNRP). We also sought views on your draft CHP from Transport Focus and London TravelWatch.

We welcome the following, which we believe are likely to be positive for passengers:

- Your commitment to respond in full to emails within 10 working days and written correspondence within 15 working days; and
- Your commitment to respond to passengers’ complaints in their preferred language.

Regarding the provision of complaints handling information in Welsh, you have informed us that you have sought the advice of the Welsh Language Commissioner’s office and have confirmed that there is no current legal obligation for you to provide information in Welsh. However, you have also stated that you are aware of the Commission’s current consideration of legislative amendments to the Welsh Language Measure 2011 to include private train companies and have committed to follow the proposals closely, making the required content available in Welsh when formally required or if significant customer demand becomes evident.

We note your current approach to receiving complaints via third party intermediaries. You have told us that if a consumer complains via an intermediary you will ask the consumer for a personal email address and respond via this channel. This in effect circumvents the intermediary. Broadly, we consider that passengers should be able to select the channel to



complain that best suits their needs, and there are a number of arguments which suggest third parties may be beneficial for consumers. In this context we also note that Transport Focus suggested this section be removed from your CHP. We are likely to consider the role of third party intermediaries further and our considerations may require changes to be made to your CHP at a later date.

In their comments on your CHP, London TravelWatch raised the point that trying to resolve issues by phone can potentially cause problems if the passenger later wants to escalate to the passenger bodies, as there will not be full correspondence for them to view. We understand that all complaints are logged and recorded on your central database. We would expect details of complaints to be recorded accurately, consistently, and in full, and for these details to be shared with the passenger bodies if an appeal is raised.

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 Transport Focus and London TravelWatch are also given. We understand that you will identify an approved ADR provider (in this case Ombudsman Services) 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, we will be engaging with ATOC 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 will continue to be engaged with developing thinking through your representation at ATOC.

In the case of CrossCountry, 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 understand that these protocols are not yet finalised and are currently in the process of being agreed. Once these protocols are agreed, we expect licence holders to abide by them in their handling of appeals.

Yours sincerely,



**Annette Egginton**





# *Complaints Handling Procedure*

---

October 2016

**Passenger Facing Document (in accordance with the September 2015 guidelines)**

## Contents

- Introduction
  - Our Commitment to you
  - Contact information
  
- Methods of contact
  - Telephone
  - Speaking to a member of our front-line staff
  - In writing by email, letter, fax or via our website
  - Social Media (Twitter and Facebook)
  - Additional formats / extra help
  
- What is a complaint?
  
- How to make a complaint
  - In person
  - In writing
  - By telephone
  - By textphone
  - Via Social Media
  
- Speed of response
  - Contact methods
  - Busy periods and extended response times
  
- How will my complaint be handled?
  - Quality of response
  - Full and fair investigations
  - Other operator / companies complaints
  - Confidentiality and Data Protection
  
- Claims and Compensation
  - Compensation
  - Delay Repay (when your journey is delayed by 30 minutes or more)
  - Insurance / Damage / Accident claims
  
- Unreasonable, aggressive or abusive customers
  
- Escalations and Independent watchdogs

## Introduction

### Welcome to CrossCountry

Our network stretches from Aberdeen to Penzance, Bournemouth to Manchester and Stansted Airport / Nottingham to Cardiff, covering over 1,400 miles and serving over 100 stations. We want you to enjoy your experience with us, from the moment you start to plan your journey to the time you reach your destination, however in the event things don't quite go to plan, we want to ensure you know what options are available to you and how you can provide us with your feedback or make a claim.

This is our policy on handling complaints. It tells you:

- How to contact us when you wish to complain
- How your complaint will be treated
- How quickly we will respond to your complaint
- When we will pay you compensation
- What action you can take if you feel we have not handled your complaint fairly
- When we will not respond to your complaint

### Our Commitment to you

If you would like to make a comment, complaint, write to us or phone us for information, we will ensure that our response is correct and easy to understand.

We will ensure that our complaints handling procedure:

- is easily accessible and well publicised
- is simple to understand and use
- provides a response within published targets
- is respectful of customers' desire for confidentiality
- addresses all the points raised and provides an effective response and appropriate redress
- is regularly monitored and audited to ensure it is effective and to allow improvements to be made
- provides information to management so that services can be improved
- complements our Passenger's Charter commitments

Our Complaints Handling Procedure will be reviewed regularly and changes made when appropriate. This will be carried out in consultation with Transport Focus, London TravelWatch and the Office of Rail and Road.

## Contact Information

Our Customer Relations team can be contacted easily. We will ensure that we provide a poster in every coach on every type of train provides address and telephone details for sending customer comments and complaints.

Information on how to contact Transport Focus and London TravelWatch can be found at the end of this document, our Passenger's Charter, timetables and on our website at [crosscountrytrains.co.uk](http://crosscountrytrains.co.uk).

If you require a comment/complaint or claim form, these can be obtained from our train staff or from stations we stop at (when the ticket office is manned). 'Passenger Charter' leaflets are available at stations we call at or on the internet at [crosscountrytrains.co.uk](http://crosscountrytrains.co.uk).

We can also provide literature in audio and large print on request. A TextPhone service is also available. We will also be happy to accept complaints or feedback from guardians, carers or support workers, on behalf of a passenger with their written permission or authority.

### *Our contact details are*

CrossCountry Customer Relations  
FREEPOST RRXU-HUEC-GLLY  
Cannon House  
18 The Priory Queensway  
Birmingham  
B4 6BS

Telephone: 03447 369 123\*

Facsimile: 0121 200 6005

Textphone: 0344 811 0126

Website: [www.crosscountrytrains.co.uk](http://www.crosscountrytrains.co.uk)

Twitter: [@crosscountryuk](https://twitter.com/crosscountryuk)

E-mail: [customer.relations@crosscountrytrains.co.uk](mailto:customer.relations@crosscountrytrains.co.uk)

\* Calls cost no more than calls to standard UK landlines and must be included in inclusive minutes and discount schemes in the same way. Calls from landlines are typically charged up to 10p per minute; calls from mobiles typically cost between 10p and 40p per minute. Calls from landlines and mobiles are included in free call packages. (Check with your provider).

## Methods of contact

### ***Telephone***

When you telephone us you will get through to our automated answering service almost immediately. You may then choose from the options on offer, or wait to speak to a member of our Customer Relations Team.

### ***Speaking to our front-line staff***

Our staff will do all they can to resolve the problem straight away. If this is not possible, they will provide you with details of how to contact Customer Relations. Our Customer Relations Team members will investigate your complaint and make sure you get the appropriate response.

As well as training our own staff to receive and pass on complaints, we also brief other staff who work for CrossCountry under contract, such as coach operators and other operators (such as station teams) along with other regular suppliers, so that they can direct you to CrossCountry Customer Relations team also.

### ***In writing by email, letter, fax or via our the website***

Every complaint received by our Customer Relations Team (including those made at stations) is logged and recorded on our central database. This allows us to analyse the reason for your contact and is used to help improve the service we provide.

### ***Via Social Media***

Our Social Media team are available to help with any comments, queries or suggestions you may have on both Facebook and Twitter. We do ask that any complaints are sent to us in writing so that we can investigate your concerns in full and respond accordingly. As a result, you may be asked to Direct / Private Message us or to contact our Customer Relations team directly to discuss the details of any formal complaint made using this contact method.

Please be aware that we will not reply to any issues regarding a member of our staff in the open forum and so would suggest that you contact us via direct message or by a more traditional method for complaints of this nature. We may also request that any images or tweets which identify a particular individual be removed (this is in accordance with our privacy and confidentiality procedures).

### ***If you require material in alternative accessible formats or if you need a little extra help***

Both our frontline and Customer Relations teams are trained to deal with queries and complaints from passengers with all types of needs. They receive regular training and briefing sessions to ensure that your enquiry or complaint is handled sensitively and in an appropriate way. More information relating to this can be found within our Disabled Persons Protection Policy (DPPP), available online or upon request.

When corresponding with our customers we will make a provision for those who require a response in a different format, or in a language other than English (this will be provided upon request). We also make provisions for customers who are visually impaired or hard of hearing.

Customers can contact us using their preferred language and we will, through the services of a translation agency, respond to the correspondence in the same language. This can however take longer than the timescales we normally set ourselves, although we will endeavor to respond as quickly as possible.

## What is a complaint?

A complaint is defined as *'any expression of dissatisfaction by a passenger, or potential passenger, about the service delivery or about company or industry policy'*

## How to make a complaint?

You and your feedback are very important to us. The information you provide will help us to make changes that can develop and grow our business. When you wish to make a complaint, it is very important that you feel you can do so safely and be responded to politely, with a promise of action and/or compensation when this is appropriate. Where we have got it wrong, we will accept responsibility and say we are sorry.

There are some pieces of information we will need when you get in touch, helping us to investigate and respond to your complaint as quickly as possible. This includes:

- your name and the address for our reply;
- information about your journey - the date you travelled, where you were travelling from and to;

and if applicable;

- either the original ticket, or in the case of Season tickets a photocopy of the ticket and your photo-card, your booking confirmation e-mail, or your unique journey number

You may make your complaint in a number of different ways:

### ***In person***

If a complaint is received about the service we provide, we will ensure that our staff can help and in many situations they are able to resolve it there and then. We will always encourage our frontline staff to try to address your concerns immediately however if they are unable to do so they will refer you to our Customer Relations team.

### ***In writing***

You may make your complaint in writing (directly to our Customer Relations team) in several ways.

- You can write us a letter
- You can email us
- You can complete a feedback form on our website
- You can send us a fax

### ***By telephone***

Comments can be made by calling 03447 369 123. Customer Relations staff are available\*:

- 08.30 - 20.00 Monday to Friday
- 09.00 - 16.00 Saturdays
- 08.30 - 16.00 on Christmas and New Years' Eve
- Closed on Sundays, Christmas Day and Boxing Day

\*Out of hours, our recorded message will confirm the details of National Rail Enquiries who are available to assist with any urgent queries.




### ***By textphone***

You can contact us using a special textphone number (0344 811 0126) during the times shown above



### ***Via Social Media***

You can contact us on Facebook and Twitter 7 days a week (06.00-22.00 Monday to Saturday and 08.00-22.00 on Sundays except Christmas Day and Boxing Day when we are closed).

-  [www.twitter.com/crosscountryuk](https://www.twitter.com/crosscountryuk) (Twitter Handle: @CrossCountryUK)
  -  [www.twitter.com/XCUpdate](https://www.twitter.com/XCUpdate) (Disruption page: @XCUpdate)
  -  [www.facebook.com/Crosscountrytrains](https://www.facebook.com/Crosscountrytrains)
- 

## **Speed of response**

### ***E-mails***

All e-mails will be automatically acknowledged within 24 hours, a unique case reference number will be allocated to you upon receipt of your email and the details will be included on our auto-response.

Our aim is to respond in full within 10 working days. If further investigation is required a further holding email will be sent. We will aim to finalise more complicated issues within 20 days.

### ***Written correspondence***

Our aim is to respond within 15 working days of receipt of a written complaint, whether it is a written letter or pre-printed form.

If further investigation is required a further holding letter will be sent. We will aim to finalise more complicated issues within 20 days.

### ***Telephone calls***

We aim to answer 95% of incoming telephone calls within 90 seconds.

If we cannot immediately resolve the complaint at the time of the call we aim to respond in the same timescales as for written correspondence shown above.

### ***Social Media***

We aim to reply to the majority of comments, feedback and suggestions posted on social media forums within 30 minutes of receipt (during our operating hours). However, if you wish to make a formal or specific complaint we advise that you do this via one of the channels detailed above.

## **Busy periods and extended response times**

We will use all reasonable endeavours to keep to our promised response rates even when there is an unexpected sudden increase in the volume of complaints received. Under exceptional circumstances during times of disruption we may seek to ease this target and will work closely with the Office of Rail and Road (ORR) and Transport Focus / London TravelWatch to advise them of any changes to our response times and the steps being taken to remedy the situation.

In the event we are unable to reply in full within the timescale published, we will endeavour to make you aware of any potential delays and provide regular updates after the target response time has elapsed, regarding the progress of your case and when you can expect to receive a full response from us.

## How will my complaint be handled?

### Quality of response

Whenever possible, a complaint will be handled by one member of the Customer Relations team from receipt to reply and it will address the points you raise. All complaints will be fully and fairly investigated and we will make reasonable endeavours to address all issues identified.

We will identify the reason for you contacting us and will register your feedback or complaint accordingly within our case management system. This may mean we need to ask you some further questions (or additional points of clarification), but we want to make sure that all elements of your case are recorded accurately in order for us to drive improvements.

Compensation will be offered when appropriate as explained in our Passenger Charter and in line with the National Rail Conditions of Travel. Copies of the Charter may be found on our website at [www.crosscountrytrains.co.uk](http://www.crosscountrytrains.co.uk), staffed stations that we stop at or on request from Customer Relations.

We prefer to handle any complaint or query directly with the individual affected and so we may request that, where possible, they contact us with their account of a situation in order for us to investigate more thoroughly (unless it is being handled as an appeal via a passenger body). Complaints sent to us via third party organisations or websites such as Resolver will be acknowledged and a request made for the claimant (or complainant) to contact us directly for a more detailed response.

We have high expectations when it comes to delivering customer service and so all members of our Customer Relations (and frontline) teams undergo a comprehensive induction and training programmes to ensure they are able to deliver the excellent standard of service our passengers deserve. This includes them spending some time with other customer facing functions across the business, helping them understand how their role impacts the passenger and what the most effective way to handle a complaint is if we want to provide an excellent level of service, first time and every time.

Providing 'Great Journeys and a Great Service' is embedded in every aspect of our business and our staff are encouraged and empowered to make decisions which reflect this. Individuals are recruited not only based on their knowledge and experience but also on the soft-skills required for effective complaints handling. They also receive specific training modules in complaints handling (including the most effective way to investigate a complaint) and achieving first-time resolution for the customer.

We undertake regular surveys and internal audits of a sample of our replies to customers in order to measure customer satisfaction with the way our customer relations team has performed and to ensure they meet our quality targets. This information is also used to improve the team's performance. We will endeavour to identify reasons why customers are unhappy with the way their case has been handled and will regularly monitor the level of feedback received, seeking ways to improve our process and delivering additional training or coaching modules accordingly.

We will pass on any complaints wholly regarding another train operator, and we will tell you which train operator is to reply to your comments and how to contact them should you not receive their response.

### **Full and fair investigation**

We aim to satisfy complaints with our first response and provide frank and honest responses to any concerns raised. We promise we will investigate all complaints made to us, fully and fairly.

We will:

- ensure we follow this Customer Complaints Handling Procedure
- make every effort to address all the issues raised in your complaint in our responses to you
- provide full and relevant explanations for the actions or policies being complained about
- explain how you can contact independent bodies if you are unhappy with our second response.

Our Customer Relations team handle any comment or complaint that requires an internal investigation. If we carry out an in-house investigation, it will be thorough and fair. We will:

- thoroughly check the relevant facts
- ensure we are not biased towards anyone involved
- obtain responses from all appropriate staff and suppliers.

We will provide a full response to your complaint, which will include:

- confirmation of when an internal investigation has been completed
- the actions we have taken to improve our service to you
- any compensation we are offering you if appropriate.

Please note, for investigations involving CrossCountry staff (or any third party provider), while we will confirm when these are required and the role of the person carrying out the investigation, we are not able to inform you of any action taken against an individual. This is to protect employee confidentiality and is in accordance with the Data Protection Act.

If you are unhappy with our first response and you contact us again, your complaint will be reviewed and responded to by a manager. This second response will include the name and position of the manager and also explain the role of Transport Focus / London TravelWatch. If you continue to remain unhappy with our response to your complaint you should contact Transport Focus.

### **Complaints regarding another company or operator**

All train companies follow the same principles when dealing with complaints referring to more than one company. To save you any trouble, we will work together with the other companies to provide you with one response and will tell you who is leading that response.

Any complaint which relates to a third party supplier who is acting on behalf of CrossCountry, such as security personnel, cleaning and catering staff, revenue protection services or suppliers of rail replacement services, will be treated as in the same way a complaint relating to any directly managed services of CrossCountry is. We will work with the provider to investigate thoroughly the details of your complaint and co-ordinate a response accordingly.

In the event that a complaint or claim which is received relates to services provided solely by another operator's services or staff, or any other agencies, this will be acknowledged and forwarded onto them within 10 days of us receiving it.

If the complaint refers in part to another transport provider, (for example a bus or aviation operator), we will explain this in our reply and aim to give you the correct address you would need to complain to. If you ask us to do so, we will forward your complaint to them directly.

Complaints relating to the Independent Penalty Fares Appeals Service, Transport Investigations Limited or British Transport Police will be handled by them directly; this is in accordance with their own complaints handling policy.

### **Confidentiality and Data Protection**

We will store and use any personal data which you provide to us when contacting us for the specific purpose of investigating your claim or complaint and to contact you regarding such investigation or to request further information or confirmation regarding the complaint in question. This is in addition to the data which is referenced to in the section 'Monitoring and Reporting'.

At all times such use and storage will be in accordance with the Data Protection Act 1998 and any other relevant legislation from time to time.

CrossCountry Trains and the Office of Rail and Road are undertaking some joint research into passenger satisfaction with complaints handling, which involves a short online survey about your experience of how your complaint was handled. This will be sent to you by a professional research company called Critical Research. If you prefer not to be contacted please email us at [customer.relations@crosscountrytrains.co.uk](mailto:customer.relations@crosscountrytrains.co.uk) or by calling 03447 369 123 (option 3).

---

## **Claims and Compensation**

### **Compensation**

We know that when we fail to meet expectations, providing an explanation and a sincere apology is often enough. Any compensation that is provided will be issued in accordance with the National Rail Conditions of Travel, our Passenger's Charter and our own internal guidelines. If appropriate, we will also offer compensation or a goodwill gesture, so that you will feel satisfied and wish to travel again with us.

Compensation will usually be offered as:

- National Rail Travel Vouchers for payment or part payment of a future journey, or
- a cash alternative (for example Cheque or BACS), or
- a complimentary ticket(s) for a future journey,

You might have a statutory right to receive compensation via the method you used to purchase your original ticket. Should an acceptable method not be listed above, then please do not hesitate to contact our Customer Relations team on 03447 369 123

Our Passenger's Charter explains our compensation policy, including the levels you can expect during service disruption. You can get our Passenger's Charter from our Customer Relations, team, staffed stations and our website, [crosscountrytrains.co.uk](http://crosscountrytrains.co.uk)

Regardless of the method you used to contact us, we will always do our best to let you know if you are entitled to claim compensation for any element of your journey under the terms of our Passenger Charter.

### **Delay Repay Claims**

If you arrive at your destination station late (by 30 minutes or more, as a result of a delay incurred on one of our services), you will be entitled to claim compensation under our Delay Repay scheme and in line with our Passenger Charter and National Rail Conditions of Travel.

Claims must be submitted within 28 days of the delay being experienced. We do not normally accept claims for compensation if trains are delayed or cancelled and you were aware of the delay before you bought your ticket. In the event that we introduce an emergency timetable, compensation will be based on the emergency timetable.

So that we can process your application and get your compensation back to you, please make sure that you let us have:

- Either the original ticket, or in the case of Season tickets a photocopy of the ticket and your photocard, your booking confirmation e-mail, or your unique journey number;
- Your name and the address for our reply; and
- Information about your journey - the date you travelled, where you were travelling from and to, and how long you were delayed

In accordance with your legal rights as a consumer you may be eligible to a different level of compensation where CrossCountry is at fault and nothing set out above is intended to limit or exclude your legal rights in these circumstances. If you believe this applies to your journey, please contact our Customer Relations team

### **Interface with insurance claim publicity and procedures**

If you wish to make a claim for losses, property damage or personal injury this should be made in writing or e-mail to Customer Relations who will ensure it is forwarded to our Claims Handler.

The rail industry has an arrangement called the Claims Allocation and Handling Agreement (CAHA). Under this agreement, compensation should be dealt with by the companies for their own customers. If some or all responsibility is allocated to another party, the insurance companies balance the payments behind the scenes. Claims will be dealt with in accordance with this agreement.

---

### **Unreasonable, aggressive or abusive customers**

If you believe we have not met our customer service standards, we understand that you may feel angry or upset. Whilst we respect the rights of our customers to express their views, we will not tolerate aggressive, threatening or abusive behaviour of any kind.

#### **By telephone**

Our Customer Services staff are trained to remain polite at all times. In return, we do expect our customers to maintain a level of courtesy and politeness whilst we are given the opportunity to resolve their complaint. We do not expect our staff to tolerate verbal abuse or threats or any other manner of intimidating behaviour from customers. Should instances of this nature occur, our staff have our full support in terminating a call, or written correspondence.

#### **In person**

If you use abusive language or behaviour to a member of our staff, they may walk away, or seek assistance from another member of staff. In extreme circumstances the Police may be called. In these circumstances, it is unlikely that your complaint will be taken seriously.

### **Via Social Media**

Our Social Media forums are there to offer help and advice to those who need it and so we aim to respond to all post and tweets we receive. However, it is accessible to young and old alike and so we ask that you remain polite and avoid abusive language. We will respond to messages which contain swear words, but we will remind you to refrain from using this language within future conversations. Repeated incidents of an unacceptable nature will result in the content being removed or the account being blocked to prevent further instances being viewed.

### **By letter, fax or our website**

If a complaint contains abusive language or is aggressive in tone, we will reply, but will advise you in our response that this is unacceptable.

Our firewall technology will intercept any email which it believes contains profanities, therefore a delay in responding may occur whilst the email is released by our IT security team.

If in the unlikely event that this escalates to a situation where we are receiving abusive or threatening calls and letters from a specific person we will take appropriate action and notify the British Transport Police and our solicitors. We have a duty to ensure the welfare of all our employees, and are grateful for our customers' cooperation with this policy.

We also reserve the right to terminate any correspondence or communication that we believe to be unreasonable, aggressive or abusive, voluminous, frivolous or vexatious and which specifically diverts resources. The decision to take this action will only be made by a senior manager after ensuring the involvement of Transport Focus or London TravelWatch, and we will always advise in writing our reasoning behind this decision.

---

## **Escalations and contacting Independent Consumer Watchdogs**

Transport Focus and London TravelWatch are independent consumer watchdogs, established by Parliament to protect and champion passengers' interests. They work with train companies, Network Rail, Government and others to get the best deal for rail passengers. One of their responsibilities is to look at cases where passengers are not happy with our response when something has gone wrong.

London TravelWatch is the appeals body relating to rail travel in London and the surrounding areas (with regards to CrossCountry, this would only apply for journeys which originated from Stansted). Transport Focus has a Great Britain wide remit. Contact details for both Transport Focus and London TravelWatch can be found at the end of this page.

We will always try to address your comments and concerns in a fair and reasonable way in accordance with the National Rail Conditions of Travel, our Customer Complaints Handling Procedure and our Passenger's Charter. However, if you are not happy with our response, you can contact Transport Focus / London TravelWatch who will consider your case and where they believe it is appropriate, will follow things up on your behalf. As London TravelWatch is responsible for complaints relating to transport in London and the surrounding area, we would therefore recommend that any appeal relating to CrossCountry be sent to Transport Focus.

Please note that in addition to this, the Alternative Dispute Resolution for consumer disputes (Competent Authorities and information) regulations 2015 requires us to advise you of an 'Alternative Dispute Resolution' organisation for your complaint. In our case this is The Consumer Ombudsman ([www.consumer-ombudsman.org](http://www.consumer-ombudsman.org)). However, as Transport Focus/London Travelwatch already provides 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/London Travelwatch as appropriate.

If Transport Focus / London TravelWatch takes up a claim on a customer's behalf, this will be dealt with by a member of the Customer Relations management team. Should Transport Focus / London TravelWatch still not be satisfied with the response the Head of Customer Relations will be asked to intervene. Transport Focus will be kept informed throughout the appeal. We would expect to deal with such an appeal as follows;

- Acknowledge receipt of the appeal within 2 working days
- Respond to any requests for case correspondence within 5 working days; and
- Respond to appeal submissions within 10 working days (or a maximum of 20 working days where the appeal is more complex)

In the event that we are unable to meet the above requirement, we will agree a suitable timescale with Transport Focus with an explanation or reason for the delay.

There are occasions where a customer feels so aggrieved with a particular experience that they feel the need to speak to a Senior Manager or Managing Director. Whilst we will always endeavour to consider these requests, we would ask our customers to contact our Customer Relations team in the first instance in order for their complaint to be dealt with in a consistent manner.

Additionally our Customer Relations team is best placed to log a complaint, record the customer's experience and offer a resolution. Our Senior Managers are kept up to date with customer correspondence and will take appropriate action where necessary to improve our services as a result of complaints received.



**Transport Focus**

Freepost (RTEH-XAGE-BYKZ)  
PO Box 5594  
Southend on Sea  
SS1 9PZ

Website: [www.transportfocus.org.uk](http://www.transportfocus.org.uk)  
Telephone: 0300 123 2350  
Fax: 0161 244 5981  
Email: [advice@transportfocus.org.uk](mailto:advice@transportfocus.org.uk)



**London TravelWatch\***  
169 Union Street

London  
SE1 0LL

Website: [www.londontravelwatch.org.uk](http://www.londontravelwatch.org.uk)  
Telephone: 0203 176 2999  
Fax: 0207 505 9003  
Email: [enquiries@londontravelwatch.org.uk](mailto:enquiries@londontravelwatch.org.uk)

\*(for journeys in London and the surrounding area, including those originating from Stansted)





# *Complaints Handling Procedure*

---

**October 2016**

**Non-Passenger Facing Document to include process information (in accordance with the September 2015 guidelines)**

## Contents

- Introduction
  - Our Commitment to you
  - Contact information
- Methods of contact
  - Telephone
  - Speaking to a member of our front-line staff
  - In writing by email, letter, fax or via our website
  - Social Media (Twitter and Facebook)
  - Additional formats / extra help
- What is a complaint?
- How to make a complaint
  - In person
  - In writing
  - By telephone
  - By textphone
  - Via Social Media
- Speed of response
  - Contact methods
  - Busy periods and extended response times
- How will my complaint be handled?
  - Quality of response
  - Full and fair investigations
  - Other operator / companies complaints
  - Confidentiality and Data Protection
- Claims and Compensation
  - Compensation
  - Delay Repay (when your journey is delayed by 30 minutes or more)
  - Insurance / Damage / Accident claims
- Unreasonable, aggressive or abusive customers
- Escalations and Independent watchdogs
- Monitoring and reporting

## Introduction

### Welcome to CrossCountry

Our network stretches from Aberdeen to Penzance, Bournemouth to Manchester and Stansted Airport / Nottingham to Cardiff, covering over 1,400 miles and serving over 100 stations. We want you to enjoy your experience with us, from the moment you start to plan your journey to the time you reach your destination, however in the event things don't quite go to plan, we want to ensure you know what options are available to you and how you can provide us with your feedback or make a claim.

This is our policy on handling complaints. It tells you:

- How to contact us when you wish to complain
- How your complaint will be treated
- How quickly we will respond to your complaint
- When we will pay you compensation
- What action you can take if you feel we have not handled your complaint fairly
- When we will not respond to your complaint

### Our Commitment to you

If you would like to make a comment, complaint, write to us or phone us for information, we will ensure that our response is correct and easy to understand.

We will ensure that our complaints handling procedure:

- is easily accessible and well publicised
- is simple to understand and use
- provides a response within published targets
- is respectful of customers' desire for confidentiality
- addresses all the points raised and provides an effective response and appropriate redress
- is regularly monitored and audited to ensure it is effective and to allow improvements to be made
- provides information to management so that services can be improved
- complements our Passenger's Charter commitments

Our Complaints Handling Procedure will be reviewed regularly and changes made when appropriate. This will be carried out in consultation with Transport Focus, London TravelWatch and the Office of Rail and Road.

## Contact Information

Our Customer Relations team can be contacted easily. We will ensure that we provide a poster in every coach on every type of train provides address and telephone details for sending customer comments and complaints.

Information on how to contact Transport Focus and London TravelWatch can be found at the end of this document, our Passenger's Charter, timetables and on our website at [crosscountrytrains.co.uk](http://crosscountrytrains.co.uk).

If you require a comment/complaint or claim form, these can be obtained from our train staff or from stations we stop at (when the ticket office is manned). 'Passenger Charter' leaflets are available at stations we call at or on the internet at [crosscountrytrains.co.uk](http://crosscountrytrains.co.uk).

We can also provide literature in audio and large print on request. A TextPhone service is also available. We will also be happy to accept complaints or feedback from guardians, carers or support workers, on behalf of a passenger with their written permission or authority.

### *Our contact details are*

CrossCountry Customer Relations  
FREEPOST RRXU-HUEC-GLLY  
Cannon House  
18 The Priory Queensway  
Birmingham  
B4 6BS

Telephone: 03447 369 123\*

Facsimile: 0121 200 6005

Textphone: 0344 811 0126

Website: [www.crosscountrytrains.co.uk](http://www.crosscountrytrains.co.uk)

Twitter: [@crosscountryuk](https://twitter.com/crosscountryuk)

E-mail: [customer.relations@crosscountrytrains.co.uk](mailto:customer.relations@crosscountrytrains.co.uk)

\* Calls cost no more than calls to standard UK landlines and must be included in inclusive minutes and discount schemes in the same way. Calls from landlines are typically charged up to 10p per minute; calls from mobiles typically cost between 10p and 40p per minute. Calls from landlines and mobiles are included in free call packages. (Check with your provider).

## Methods of contact

### ***Telephone***

When you telephone us you will get through to our automated answering service almost immediately. You may then choose from the options on offer, or wait to speak to a member of our Customer Relations Team.

### ***Speaking to our front-line staff***

Our staff will do all they can to resolve the problem straight away. If this is not possible, they will provide you with details of how to contact Customer Relations. Our Customer Relations Team members will investigate your complaint and make sure you get the appropriate response.

As well as training our own staff to receive and pass on complaints, we also brief other staff who work for CrossCountry under contract, such as coach operators and other operators (such as station teams) along with other regular suppliers, so that they can direct you to CrossCountry Customer Relations team also.

### ***In writing by email, letter, fax or via our the website***

Every complaint received by our Customer Relations Team (including those made at stations) is logged and recorded on our central database. This allows us to analyse the reason for your contact and is used to help improve the service we provide.

### ***Via Social Media***

Our Social Media team are available to help with any comments, queries or suggestions you may have on both Facebook and Twitter. We do ask that any complaints are sent to us in writing so that we can investigate your concerns in full and respond accordingly. As a result, you may be asked to Direct / Private Message us or to contact our Customer Relations team directly to discuss the details of any formal complaint made using this contact method.

Please be aware that we will not reply to any issues regarding a member of our staff in the open forum and so would suggest that you contact us via direct message or by a more traditional method for complaints of this nature. We may also request that any images or tweets which identify a particular individual be removed (this is in accordance with our privacy and confidentiality procedures).

### ***If you require material in alternative accessible formats or if you need a little extra help***

Both our frontline and Customer Relations teams are trained to deal with queries and complaints from passengers with all types of needs. They receive regular training and briefing sessions to ensure that your enquiry or complaint is handled sensitively and in an appropriate way. More information relating to this can be found within our Disabled Persons Protection Policy (DPPP), available online or upon request.

When corresponding with our customers we will make a provision for those who require a response in a different format, or in a language other than English (this will be provided upon request). We also make provisions for customers who are visually impaired or hard of hearing.

Customers can contact us using their preferred language and we will, through the services of a translation agency, respond to the correspondence in the same language. This can however take longer than the timescales we normally set ourselves, although we will endeavor to respond as quickly as possible.

## What is a complaint?

A complaint is defined as *'any expression of dissatisfaction by a passenger, or potential passenger, about the service delivery or about company or industry policy'*

## How to make a complaint?

You and your feedback are very important to us. The information you provide will help us to make changes that can develop and grow our business. When you wish to make a complaint, it is very important that you feel you can do so safely and be responded to politely, with a promise of action and/or compensation when this is appropriate. Where we have got it wrong, we will accept responsibility and say we are sorry.

There are some pieces of information we will need when you get in touch, helping us to investigate and respond to your complaint as quickly as possible. This includes:

- your name and the address for our reply;
- information about your journey - the date you travelled, where you were travelling from and to;

and if applicable;

- either the original ticket, or in the case of Season tickets a photocopy of the ticket and your photo-card, your booking confirmation e-mail, or your unique journey number

You may make your complaint in a number of different ways:

### ***In person***

If a complaint is received about the service we provide, we will ensure that our staff can help and in many situations they are able to resolve it there and then. We will always encourage our frontline staff to try to address your concerns immediately however if they are unable to do so they will refer you to our Customer Relations team.

### ***In writing***

You may make your complaint in writing (directly to our Customer Relations team) in several ways.

- You can write us a letter
- You can email us
- You can complete a feedback form on our website
- You can send us a fax

### ***By telephone***

Comments can be made by calling 03447 369 123. Customer Relations staff are available\*:

- 08.30 - 20.00 Monday to Friday
- 09.00 - 16.00 Saturdays
- 08.30 - 16.00 on Christmas and New Years' Eve
- Closed on Sundays, Christmas Day and Boxing Day

\*Out of hours, our recorded message will confirm the details of National Rail Enquiries who are available to assist with any urgent queries.

### ***By textphone***

You can contact us using a special textphone number (0344 811 0126) during the times shown above

### ***Via Social Media***

You can contact us on Facebook and Twitter 7 days a week (06.00-22.00 Monday to Saturday and 08.00-22.00 on Sundays except Christmas Day and Boxing Day when we are closed).

-  [www.twitter.com/crosscountryuk](https://www.twitter.com/crosscountryuk) (Twitter Handle: @CrossCountryUK)
  -  [www.twitter.com/XCUpdate](https://www.twitter.com/XCUpdate) (Disruption page: @XCUpdate)
  -  [www.facebook.com/Crosscountrytrains](https://www.facebook.com/Crosscountrytrains)
- 

## **Speed of response**

### ***E-mails***

All e-mails will be automatically acknowledged within 24 hours, a unique case reference number will be allocated to you upon receipt of your email and the details will be included on our auto-response.

Our aim is to respond in full within 10 working days. If further investigation is required a further holding email will be sent. We will aim to finalise more complicated issues within 20 days.

### ***Written correspondence***

Our aim is to respond within 15 working days of receipt of a written complaint, whether it is a written letter or pre-printed form.

If further investigation is required a further holding letter will be sent. We will aim to finalise more complicated issues within 20 days.

### ***Telephone calls***

We aim to answer 95% of incoming telephone calls within 90 seconds.

If we cannot immediately resolve the complaint at the time of the call we aim to respond in the same timescales as for written correspondence shown above.

### ***Social Media***

We aim to reply to the majority of comments, feedback and suggestions posted on social media forums within 30 minutes of receipt (during our operating hours). However, if you wish to make a formal or specific complaint we advise that you do this via one of the channels detailed above.

## **Busy periods and extended response times**

We will use all reasonable endeavours to keep to our promised response rates even when there is an unexpected sudden increase in the volume of complaints received. Under exceptional circumstances during times of disruption we may seek to ease this target and will work closely with the Office of Rail and Road (ORR) and Transport Focus / London TravelWatch to advise them of any changes to our response times and the steps being taken to remedy the situation.

In the event we are unable to reply in full within the timescale published, we will endeavour to make you aware of any potential delays and provide regular updates after the target response time has elapsed, regarding the progress of your case and when you can expect to receive a full response from us.

## How will my complaint be handled?

### Quality of response

Whenever possible, a complaint will be handled by one member of the Customer Relations team from receipt to reply and it will address the points you raise. All complaints will be fully and fairly investigated and we will make reasonable endeavours to address all issues identified.

We will identify the reason for you contacting us and will register your feedback or complaint accordingly within our case management system. This may mean we need to ask you some further questions (or additional points of clarification), but we want to make sure that all elements of your case are recorded accurately in order for us to drive improvements.

Compensation will be offered when appropriate as explained in our Passenger Charter and in line with the National Rail Conditions of Travel. Copies of the Charter may be found on our website at [www.crosscountrytrains.co.uk](http://www.crosscountrytrains.co.uk), staffed stations that we stop at or on request from Customer Relations.

We prefer to handle any complaint or query directly with the individual affected and so we may request that, where possible, they contact us with their account of a situation in order for us to investigate more thoroughly (unless it is being handled as an appeal via a passenger body). Complaints sent to us via third party organisations or websites such as Resolver will be acknowledged and a request made for the claimant (or complainant) to contact us directly for a more detailed response.

We have high expectations when it comes to delivering customer service and so all members of our Customer Relations (and frontline) teams undergo a comprehensive induction and training programmes to ensure they are able to deliver the excellent standard of service our passengers deserve. This includes them spending some time with other customer facing functions across the business, helping them understand how their role impacts the passenger and what the most effective way to handle a complaint is if we want to provide an excellent level of service, first time and every time.

Providing 'Great Journeys and a Great Service' is embedded in every aspect of our business and our staff are encouraged and empowered to make decisions which reflect this. Individuals are recruited not only based on their knowledge and experience but also on the soft-skills required for effective complaints handling. They also receive specific training modules in complaints handling (including the most effective way to investigate a complaint) and achieving first-time resolution for the customer.

We undertake regular surveys and internal audits of a sample of our replies to customers in order to measure customer satisfaction with the way our customer relations team has performed and to ensure they meet our quality targets. This information is also used to improve the team's performance. We will endeavour to identify reasons why customers are unhappy with the way their case has been handled and will regularly monitor the level of feedback received, seeking ways to improve our process and delivering additional training or coaching modules accordingly.

We will pass on any complaints wholly regarding another train operator, and we will tell you which train operator is to reply to your comments and how to contact them should you not receive their response.



### **Full and fair investigation**

We aim to satisfy complaints with our first response and provide frank and honest responses to any concerns raised. We promise we will investigate all complaints made to us, fully and fairly.

We will:

- ensure we follow this Customer Complaints Handling Procedure
- make every effort to address all the issues raised in your complaint in our responses to you
- provide full and relevant explanations for the actions or policies being complained about
- explain how you can contact independent bodies if you are unhappy with our second response.

Our Customer Relations team handle any comment or complaint that requires an internal investigation. If we carry out an in-house investigation, it will be thorough and fair. We will:

- thoroughly check the relevant facts
- ensure we are not biased towards anyone involved
- obtain responses from all appropriate staff and suppliers.

We will provide a full response to your complaint, which will include:

- confirmation of when an internal investigation has been completed
- the actions we have taken to improve our service to you
- any compensation we are offering you if appropriate.

Please note, for investigations involving CrossCountry staff (or any third party provider), while we will confirm when these are required and the role of the person carrying out the investigation, we are not able to inform you of any action taken against an individual. This is to protect employee confidentiality and is in accordance with the Data Protection Act.

If you are unhappy with our first response and you contact us again, your complaint will be reviewed and responded to by a manager. This second response will include the name and position of the manager and also explain the role of Transport Focus / London TravelWatch. If you continue to remain unhappy with our response to your complaint you should contact Transport Focus.

### **Complaints regarding another company or operator**

All train companies follow the same principles when dealing with complaints referring to more than one company. To save you any trouble, we will work together with the other companies to provide you with one response and will tell you who is leading that response.

Any complaint which relates to a third party supplier who is acting on behalf of CrossCountry, such as security personnel, cleaning and catering staff, revenue protection services or suppliers of rail replacement services, will be treated as in the same way a complaint relating to any directly managed services of CrossCountry is. We will work with the provider to investigate thoroughly the details of your complaint and co-ordinate a response accordingly.

In the event that a complaint or claim which is received relates to services provided solely by another operator's services or staff, or any other agencies, this will be acknowledged and forwarded onto them within 10 days of us receiving it.

If the complaint refers in part to another transport provider, (for example a bus or aviation operator), we will explain this in our reply and aim to give you the correct address you would need to complain to. If you ask us to do so, we will forward your complaint to them directly.

Complaints relating to the Independent Penalty Fares Appeals Service, Transport Investigations Limited or British Transport Police will be handled by them directly; this is in accordance with their own complaints handling policy.

### **Confidentiality and Data Protection**

We will store and use any personal data which you provide to us when contacting us for the specific purpose of investigating your claim or complaint and to contact you regarding such investigation or to request further information or confirmation regarding the complaint in question. This is in addition to the data which is referenced to in the section 'Monitoring and Reporting'.

At all times such use and storage will be in accordance with the Data Protection Act 1998 and any other relevant legislation from time to time.

CrossCountry Trains and the Office of Rail and Road are undertaking some joint research into passenger satisfaction with complaints handling, which involves a short online survey about your experience of how your complaint was handled. This will be sent to you by a professional research company called Critical Research. If you prefer not to be contacted please email us at [customer.relations@crosscountrytrains.co.uk](mailto:customer.relations@crosscountrytrains.co.uk) or by calling 03447 369 123 (option 3).

---

## **Claims and Compensation**

### **Compensation**

We know that when we fail to meet expectations, providing an explanation and a sincere apology is often enough. Any compensation that is provided will be issued in accordance with the National Rail Conditions of Travel, our Passenger's Charter and our own internal guidelines. If appropriate, we will also offer compensation or a goodwill gesture, so that you will feel satisfied and wish to travel again with us.

Compensation will usually be offered as:

- National Rail Travel Vouchers for payment or part payment of a future journey, or
- a cash alternative (for example Cheque or BACS), or
- a complimentary ticket(s) for a future journey,

You might have a statutory right to receive compensation via the method you used to purchase your original ticket. Should an acceptable method not be listed above, then please do not hesitate to contact our Customer Relations team on 03447 369 123.

Our Passenger's Charter explains our compensation policy, including the levels you can expect during service disruption. You can get our Passenger's Charter from our Customer Relations, team, staffed stations and our website, [crosscountrytrains.co.uk](http://crosscountrytrains.co.uk)

Regardless of the method you used to contact us, we will always do our best to let you know if you are entitled to claim compensation for any element of your journey under the terms of our Passenger Charter.

### **Delay Repay Claims**

If you arrive at your destination station late (by 30 minutes or more, as a result of a delay incurred on one of our services), you will be entitled to claim compensation under our Delay Repay scheme and in line with our Passenger Charter and National Rail Conditions of Travel.

Claims must be submitted within 28 days of the delay being experienced. We do not normally accept claims for compensation if trains are delayed or cancelled and you were aware of the delay before you bought your ticket. In the event that we introduce an emergency timetable, compensation will be based on the emergency timetable.

So that we can process your application and get your compensation back to you, please make sure that you let us have:

- Either the original ticket, or in the case of Season tickets a photocopy of the ticket and your photocard, your booking confirmation e-mail, or your unique journey number;
- Your name and the address for our reply; and
- Information about your journey - the date you travelled, where you were travelling from and to, and how long you were delayed

In accordance with your legal rights as a consumer you may be eligible to a different level of compensation where CrossCountry is at fault and nothing set out above is intended to limit or exclude your legal rights in these circumstances. If you believe this applies to your journey, please contact our Customer Relations team

### **Interface with insurance claim publicity and procedures**

If you wish to make a claim for losses, property damage or personal injury this should be made in writing or e-mail to Customer Relations who will ensure it is forwarded to our Claims Handler.

The rail industry has an arrangement called the Claims Allocation and Handling Agreement (CAHA). Under this agreement, compensation should be dealt with by the companies for their own customers. If some or all responsibility is allocated to another party, the insurance companies balance the payments behind the scenes. Claims will be dealt with in accordance with this agreement.

---

### **Unreasonable, aggressive or abusive customers**

If you believe we have not met our customer service standards, we understand that you may feel angry or upset. Whilst we respect the rights of our customers to express their views, we will not tolerate aggressive, threatening or abusive behaviour of any kind.

#### **By telephone**

Our Customer Services staff are trained to remain polite at all times. In return, we do expect our customers to maintain a level of courtesy and politeness whilst we are given the opportunity to resolve their complaint. We do not expect our staff to tolerate verbal abuse or threats or any other manner of intimidating behaviour from customers. Should instances of this nature occur, our staff have our full support in terminating a call, or written correspondence.

#### **In person**

If you use abusive language or behaviour to a member of our staff, they may walk away, or seek assistance from another member of staff. In extreme circumstances the Police may be called. In these circumstances, it is unlikely that your complaint will be taken seriously.

#### **Via Social Media**

Our Social Media forums are there to offer help and advice to those who need it and so we aim to respond to all post and tweets we receive. However, it is accessible to young and old alike and so we ask that you remain polite and avoid abusive language. We will respond to messages which

contain swear words, but we will remind you to refrain from using this language within future conversations. Repeated incidents of an unacceptable nature will result in the content being removed or the account being blocked to prevent further instances being viewed.

### **By letter, fax or our website**

If a complaint contains abusive language or is aggressive in tone, we will reply, but will advise you in our response that this is unacceptable.

Our firewall technology will intercept any email which it believes contains profanities, therefore a delay in responding may occur whilst the email is released by our IT security team.

If in the unlikely event that this escalates to a situation where we are receiving abusive or threatening calls and letters from a specific person we will take appropriate action and notify the British Transport Police and our solicitors. We have a duty to ensure the welfare of all our employees, and are grateful for our customers' cooperation with this policy.

We also reserve the right to terminate any correspondence or communication that we believe to be unreasonable, aggressive or abusive, voluminous, frivolous or vexatious and which specifically diverts resources. The decision to take this action will only be made by a senior manager after ensuring the involvement of Transport Focus or London TravelWatch, and we will always advise in writing our reasoning behind this decision.

---

## **Escalations and contacting Independent Consumer Watchdogs**

Transport Focus and London TravelWatch are independent consumer watchdogs, established by Parliament to protect and champion passengers' interests. They work with train companies, Network Rail, Government and others to get the best deal for rail passengers. One of their responsibilities is to look at cases where passengers are not happy with our response when something has gone wrong.

London TravelWatch is the appeals body relating to rail travel in London and the surrounding areas (with regards to CrossCountry, this would only apply for journeys which originated from Stansted). Transport Focus has a Great Britain wide remit. Contact details for both Transport Focus and London TravelWatch can be found at the end of this page.

We will always try to address your comments and concerns in a fair and reasonable way in accordance with the National Rail Conditions of Travel, our Customer Complaints Handling Procedure and our Passenger's Charter. However, if you are not happy with our response, you can contact Transport Focus / London TravelWatch who will consider your case and where they believe it is appropriate, will follow things up on your behalf. As London TravelWatch is responsible for complaints relating to transport in London and the surrounding area, we would therefore recommend that any appeal relating to CrossCountry be sent to Transport Focus.

Please note that in addition to this, the Alternative Dispute Resolution for consumer disputes (Competent Authorities and information) regulations 2015 requires us to advise you of an 'Alternative Dispute Resolution' organisation for your complaint. In our case this is The Consumer Ombudsman ([www.consumer-ombudsman.org](http://www.consumer-ombudsman.org)). However, as Transport Focus/London Travelwatch already provides 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/London Travelwatch as appropriate.

If Transport Focus / London TravelWatch takes up a claim on a customer's behalf, this will be dealt with by a member of the Customer Relations management team. Should Transport Focus / London TravelWatch still not be satisfied with the response the Head of Customer Relations will be asked to intervene. Transport Focus will be kept informed throughout the appeal. We would expect to deal with such an appeal as follows;

- Acknowledge receipt of the appeal within 2 working days
- Respond to any requests for case correspondence within 5 working days; and
- Respond to appeal submissions within 10 working days (or a maximum of 20 working days where the appeal is more complex)

In the event that we are unable to meet the above requirement, we will agree a suitable timescale with Transport Focus with an explanation or reason for the delay.

There are occasions where a customer feels so aggrieved with a particular experience that they feel the need to speak to a Senior Manager or Managing Director. Whilst we will always endeavour to consider these requests, we would ask our customers to contact our Customer Relations team in the first instance in order for their complaint to be dealt with in a consistent manner.

Additionally our Customer Relations team is best placed to log a complaint, record the customers experience and offer a resolution. Our Senior Managers are kept up to date with customer correspondence and will take appropriate action where necessary to improve our services as a result of complaints received.



**Transport Focus**

Freepost (RTEH-XAGE-BYKZ)  
PO Box 5594  
Southend on Sea  
SS1 9PZ

Website: [www.transportfocus.org.uk](http://www.transportfocus.org.uk)  
Telephone: 0300 123 2350  
Fax: 0161 244 5981  
Email: [advice@transportfocus.org.uk](mailto:advice@transportfocus.org.uk)



**London TravelWatch\***

169 Union Street  
London  
SE1 0LL

Website: [www.londontravelwatch.org.uk](http://www.londontravelwatch.org.uk)  
Telephone: 0203 176 2999  
Fax: 0207 505 9003 Email: [enquiries@londontravelwatch.org.uk](mailto:enquiries@londontravelwatch.org.uk)

\*(for journeys in London and the surrounding area, including those originating from Stansted)

**Monitoring and reporting**

We welcome feedback in relation to all aspects of the service we provide, whether this be negative, positive or neutral as we believe it helps us to plan and deliver the service which our passengers require from us. To help us to do this, we ensure that the comments and complaints we receive are communicated right across the organisation, helping drive improvements (right from the planning process through to delivery and beyond).

Every telephone call, email, letter and web form we receive is logged in our Customer Relations case management system as soon as we receive it and assigned a unique reference number. Our support team will then categorise each case based on the 'reason' for contact, e.g. complaint (standard and non-standard), comments & suggestions (feedback), praise, claims or enquiry. As the case is being worked, the agent will also record additional categories to help the business identify the reasons for customer contact, e.g. 'complaint regarding unavailability of seats or 'marketing promotion enquiry'. The details of the passengers' journey (including time and date) are also recorded, where applicable, to enable us to drill down by service / route / facility offered etc.

### Monitoring

We actively monitor our Customer Complaints Handling Procedure to ensure it is effective and complies with any industry changes (for example revisions to guidelines).

- Our Customer Relations team undergo an intensive induction and a comprehensive training programme upon joining the team and continue to receive regular coaching sessions to ensure that they can confidently deliver excellent customer service to our passengers
- We monitor telephone calls to our Customer Relations team to ensure your complaint is handled in a friendly, appropriate and professional manner
- A detailed quality assurance programme is in place for every team member. This includes a minimum of 10% of all activities automatically quarantined for approval before it can be progressed and the response issued to the passenger
- Regular performance reviews and feedback sessions are conducted to ensure any training needs or coaching requirements are identified quickly and addressed efficiently
- Our in-house Customer Relations team enter details of complaints onto our Customer Relations Management System, which allows us to record and monitor the number and type of complaints received along with average response times.
- Regular reviews and monitoring of third-party providers (Telesales and web support) are conducted to ensure SLA's and quality assurance are being achieved. These reviews are conducted at least once quarterly.
- Undertake quarterly customer satisfaction surveys to determine what our passengers think of the services we provide

In addition to this, every month:

- The Head of Customer Relations reviews the results of the optional survey link provided with every electronic response (sent by the Customer Relations team), identifying areas of improvement and implementing recommendations in-light of customer feedback into the way their complaint has been handled.
- Our Team Coaches and Directors sample and review the written responses made by our team with our Customer Relations Management Team to ensure complaints are dealt with promptly and effectively and that the correct level of compensation has been awarded (rectifying any errors identified)
- The Customer Relations Team Manager(s) monitor and review the information and responses communicated using our Social Media channels

### Management reports

Our monitoring processes help us assess whether we are handling complaints efficiently and that customers are satisfied with our responses. Your feedback helps us identify where we can make things better.

To ensure our managers drive improvement, we:

- Ensure every comment, complaint or suggestion received is logged onto our central Customer Relations database (CRM system) and stored in a way which allows us to analyse data and ensure it can be used as source of intelligence.
- Keep electronic / hardcopies of all correspondence locally for a minimum of 3 months (before they are sent for archiving)
- Send appropriate managers and Directors comment and complaint details for their areas of responsibility at least every four weeks. Managers are expected to use the information to identify areas for improvement and make the necessary changes
- Any complaint / praise received relating to staff members are recorded before being forwarded onto the relevant manager for their information and appropriate action (information is also stored centrally).
- Provide a summary of comments and complaints to the Board of Directors every four weeks so managers at all levels are aware of the issues
- Actively contribute to post-incident reviews and strategic event planning to ensure that the voice of the passenger is communicated and any feedback obtained is actioned
- Constantly monitor performance targets for handling customer comments and complaints and seek improved processes
- Every month, we provide information to the DfT, the Office of Road & Rail Regulation and Transport Focus on the number of comments and complaints we receive and our performance in dealing with them.
- All allegations of damage, loss or injury are sent to our Safety team for their action as soon as we are made aware (either by the passenger, the on-board teams or via a third party such as station staff). In the event that the incident is reportable to ORR under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), this is done so in accordance with the processes and timescales agreed.