



Passenger Rail Service Satisfaction: Quality and Methodology Report

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Introduction

This is a report on the quality of the ORR passenger rail service satisfaction statistics. This helps us to understand the quality of our statistics, and also ensures ORR is compliant with principle 4 of the Code of Practice for Official Statistics¹.

The quality report covers the following areas

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

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

Methodology

Passenger rail service satisfaction is measured using three metrics:

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

Complaints

Train operating companies record complaints made by letter, e-mail/ webform, telephone, meet the manager events and online forums. The operators report to the ORR on a periodic basis the number of complaint related correspondences they receive and also the complaint categories these correspondences relate to². Both datasets are disaggregated by the type of contact method used to make the complaint. Operators also provide the percentage of complaints responded to within 10 and 20 working days, and within a defined internal target. These datasets are used by the ORR to calculate complaints rate, proportion of complaints relating the each category, the percentage share of contact methods and the percentage of complaints responded to within 20 working days.

Complaints rate

The complaints rate is calculated from the total number of complaint correspondences received by each operator, i.e. the sum of all the complaint correspondences received by the different contact methods. For the statistical release the periodic data are apportioned into quarters (see below). In order to provide a meaningful comparison between operators the number of complaints are normalised by the number of passenger journeys for the quarter³. The complaints rate is presented as the number of complaints per 100,000 journeys.

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

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

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

Complaints by category

The ORR provides a template to train operators consisting of approximately 60 complaint categories; these categories are based on the 33 NRPS categories used to measure passenger satisfaction in addition to other categories where extra disaggregation is needed. For example in 2015-16 extra categories for accessibility issues and complaints handling were added as part of the ORR’s monitoring of Complaints Handling Procedures (CHPs) and Disabled People’s Protection Policies (DPPPs).

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

Complaints by contact method

The complaint category data discussed above is supplied to the ORR split by contact method type. This data is used to calculate the proportion of complaints received by each contact method. For example if an operator were to receive two telephone calls each regarding a single complaint, and one letter covering two complaint topics, this would be presented in the statistical release as the operating receiving 50% of complaints by telephone and 50% by letter.

Complaints responded to within 20 working days

For each period train operators provide the ORR with the percentage of complaint correspondences they have responded to within 20 working days. In order to classify as a full response each complaint category within the correspondence needs to have been addressed. To calculate a quarterly response rate it is assumed that the percentage reported refers to the proportion of complaints received within each period that were responded to within 20 working days⁴. Using this assumption the number of

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

↓

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

↓

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

⁴ We are aware that the reporting practice varies between operators, see Accuracy and Reliability section.

complaints responded to within 20 working days for each period are calculated and this number is then apportioned into quarters (see below) and then converted to a percentage response rate for the quarter.

Appeals closed

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

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

National Rail Enquiries (NRE) data

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

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

The data are collected at a daily level and provided to ORR after the end of each railway period by ATOC. The quarterly data are calculated by summing the data for the relevant dates for each quarter, e.g. 1 April to 30 June for Q1 (apportionment is not required here as the data is provided

at a daily level). National Rail Enquiries telephone service data are presented as the volume of calls received and the response rate.

Quarterly and periodic data

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

The standard method for apportionment is based on the number of days within the period that fall into the relevant quarter. For example, the dates in 2015-16 period 4 cover both Q1 and Q2.

When the quarterly data are calculated, 3/28 of the data are assigned to Q1 (covering 28 June to 30 June) and 25/28 of the data are assigned to Q2 (covering 1 July to 25 July). The breakdown of the calculations used for 2015-16 are as follows:

Quarter	Calculation
2015-16 Quarter 1	Period 1 + Period 2 + Period 3 + 3/28 of Period 4
2015-16 Quarter 2	25/28 of Period 4 + Period 5 + Period 6 + 11/28 of Period 7
2015-16 Quarter 3	17/28 of Period 7 + Period 8 + Period 9 + 19/28 of Period 10
2015-16 Quarter 4	9/28 of Period 10 + Period 11 + Period 12 + Period 13

Historical background

Complaints data

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

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

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

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

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

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

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

For 2015-16 the complaint categories for accessibility issues and complaints handling have been disaggregated into a number of more detailed categories so that complaints regarding specific issues such as the speed of response time to complaints and the lack of facilities for disabled people can be monitored. This is part of wider work being undertaken by the ORR to monitor the compliance by train operating companies with Complaints Handling Procedures (CHPs)⁵ and Disabled People's Protection Policies (DPPPs)⁶.

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

Appeals closed data

London TravelWatch⁷ and Transport Focus⁸ play vital roles in championing passenger rights within the rail industry in Great Britain. Transport Focus is the independent transport user watchdog, which includes representing Britain's rail passengers (outside London). Transport Focus use their knowledge to influence decisions on behalf of passengers, working with the industry, passenger groups and national and local governments to secure journey improvements. London TravelWatch is the independent, statutory watchdog for transport users in and around London⁹. Speaking for all London transport users, including rail, London TravelWatch look into complaints from people unhappy with the response they have received from their transport provider.

⁵ CHP <http://orr.gov.uk/what-and-how-we-regulate/licensing/licensing-railway-operators/licence-obligations/complaints-handling-procedures>

⁶ DPPP <http://orr.gov.uk/what-and-how-we-regulate/licensing/licensing-railway-operators/licence-obligations/disabled-peoples-protection-policy>

⁷ London TravelWatch <http://www.londontravelwatch.org.uk/home/>

⁸ Transport Focus <http://www.transportfocus.org.uk/>

⁹ Map of area covered <http://www.londontravelwatch.org.uk/about/london-travelwatch-area>

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

We previously discontinued publishing appeals opened data due to methodology differences between Transport Focus and London TravelWatch. However, we have been working with both organisations to improve the quality and comparability of their appeals data and as of 2014-15 quarter 4 have been able to present data on the number of appeals closed for each train operating company (franchised, non-franchised and Network Rail) and the complaint categories for appeals closed by Transport Focus. Historic data is available from the start of 2013-14. London TravelWatch have provided data for 2015-16 quarter 1, which is now available on the [data portal](#). However they have not been able to supply the quarter 2 data within the deadlines required to be included in this release. We are continuing to work with London TravelWatch and aim to include up to date data in future statistical releases.

National Rail Enquiries (NRE) data

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

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

Relevance

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

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

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

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

Accuracy and reliability

The proximity between an estimate and the unknown true value.

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

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

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

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

Complaints data

The recording of complaints data is not generic across all of the train operating companies. Each train operator has their own customer relationship management (CRM) system to log and update complaints received. Therefore, the categorisation of complaints may differ slightly in some instances. Furthermore, each train operator will provide their staff with their own internal training, which may differ between operators. To help overcome any issues around the categorisation and comparability of complaints data across the train operators, we have produced guidance regarding the scope and categorisation of complaints. In addition to this we produced a mapping document to improve consistency in complaints categorisation¹⁰.

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

During the process of collating the 2014-15 statistical releases we identified some data quality issues with the data sent to the ORR by some train operating companies. When recording

¹⁰ <http://orr.gov.uk/statistics/published-stats/complaints-data>

complaints TOCs should record each communication they receive and assign the topics of complaint to one or more complaint categories. In the statistical release we calculate the complaints rate from the number of the communications received, whilst the complaints by category data is calculated from the total number of topics covered in the communications.

While the majority of TOCs correctly record against multiple complaints categories if a communication covers more than one topic, we have identified a small number that incorrectly only ever record a single complaint category for each communication supplied to us in their data. We have contacted the TOCs identified and have discovered that the reason for this is often due to limitations with the various customer relationship management (CRM) systems used. In most cases this is because the CRM system used does not allow multiple complaints to be attributed to a single communication. Some TOCs address this issue by correctly recording against multiple complaints categories, which would lead to an inflation of the count of complaint correspondences, and therefore the complaints rate. Others only record the main topic of complaint, which would mean the complaint categories reported in the statistical release may not be a wholly accurate representation of the topics which have caused customers to complain. The four TOCs known to be affected by these issues are:

- Inflated complaints rate:
 - Chiltern,
 - London Overground
- Under-reported complaint categories:
 - Merseyrail
 - Southern (data available up to 2014-15 Q4)

In order to preserve the time series we have continued to present the data as we have done in previous quarters. During 2015-16 the ORR will be working to improve the quality and consistency of the data collected from the TOCs, with the intention of implementing some improvements in the 2016-17 statistical releases.

For the percentage of complaints responded to within 20 working days the periodic data provided by the train operators is multiplied out assuming that the percentage supplied relates to the complaints received in each individual period. However we are aware that due to the limitations of the CRM systems of some operators the percentage provided actually relates to the complaints that have been responded to within a particular period, regardless of when the complaint was received. Consequently the calculation used to produce the quarterly figure will not be entirely accurate for these TOCs. However, as this inaccuracy will be consistent over time, the time series

for each TOC can still be interpreted to give useful information. We are currently working with TOCs and revising our guidelines for this part of the data and hope to be able to present improved data in future statistical releases.

Appeals closed data

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

Timeliness and punctuality

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

Quarterly service satisfaction data are, on average, published 82 days after the quarter ends.

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

Accessibility and clarity

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

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

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

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

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

Coherence and comparability

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

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

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

Complaints submitted via social media, such as Twitter and Facebook, are not currently included within the complaints statistics. The number of complaints received via such sources, the definition of a 'complaint' and the resources that each train operator allocates to these social media mediums varies significantly, and therefore they are excluded from the published figures. In March 2015 ORR published a report¹¹ on the increasing use of social media amongst passengers and the challenges in capturing complaints.

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

The Rail Delivery Group (RDG) publishes key transparency indicators¹² for each TOC, for which there are complaints data available for selected operators.

¹¹ ORR report: [Social media - How to tweet your customers' right](#)

¹² <http://www.raildeliverygroup.com/about-us/transparency.html>

Length of Comparable Time Series

Measure	Time Series	Data Portal Table
Active Time Series		
Complaints rate Quarterly Annual	1997-98 Q3 1998-99	Table 14.8
Complaints rate by TOC Quarterly Annual	2007-08 Q4 2007-08	Table 14.9
Complaints by category Quarterly Annual	2007-08 Q4 2007-08	Table 14.3
Complaints by category and TOC Quarterly Annual	2010-11 Q1 2007-08	Table 14.5
Complaints by contact method Quarterly Annual	2010-11 Q1 2010-11	Table 14.6
Complaints responded to within 20 working days Quarterly Annual	2007-08 Q4 2007-08	Table 14.2
Appeals closed* Quarterly Annual	2013-14 Q1 2013-14	Table 14.15
Complaints categories for appeals closed* Quarterly Annual	2014-15 Q1 2014-15	Table 14.16
NRES (telephone enquiries received) Quarterly Annual	1997-98 Q2 1998-99	Table 14.13

Discontinued time seriesAppeals opened
Quarterly
Annual2009-10 Q4 to 2013-14 Q4
2010-11 to 2012-13[Table 14.14](#)

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



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