

Annette Egginton

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

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

19 September 2016

Will Dunnett
Managing Director
First Hull Trains

Dear Will

**Approval of Hull Trains Company Limited Complaints Handling Procedure
(Condition 6 of the GB Statement of National Regulatory Conditions: Passenger)**

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

I confirm that we have reviewed your CHP against the 2015 “*Guidance on complaints handling procedures for licence holders*” (the guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your GB Statement of National Regulatory Conditions: Passenger (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 aim to respond to 90% of passenger complaints within 5 working days; and
- Your employee empowerment scheme, which gives your customer facing staff the ability to resolve complaints on the spot when things go wrong, such as by providing a free cup of coffee or a complimentary first class upgrade.

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, trading as the Consumer Ombudsman) but that you do not plan to make use of this provider and instead complainants will be advised to contact the existing passenger bodies. Where a complainant does contact Ombudsman Services you have an arrangement in place whereby they will be referred to the relevant passenger body.

This approach appears to discharge the information requirements in the Regulations, however, 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 Hull Trains the relevant passenger bodies are Transport Focus and London TravelWatch. In line with the requirements of the guidance, licence holders must establish an appeals handling protocol where the passenger bodies require this. We understand that these protocols have been finalised and we expect licence holders to abide by them in their handling of appeals.

You have informed us that you are carrying out work on your website to ensure that it is compliant with the minimum requirements of the guidance. You have confirmed that this will include providing a clear path to complain through your customer service page, including information on your complaints handling service standards and a link to your CHP. You have confirmed that this should be delivered by mid-September. Please provide us with confirmation when this is complete.

Yours sincerely,



Annette Egginton





HullTrains

Your local link to London

Customer Complaints Handling Procedure

Valid from 1st August 2016 until further notice



Hull Trains

Your local link to London

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Welcome to Hull Trains

1. Introduction

We are dedicated to ensuring that your travel experience is relaxing and enjoyable and we are committed to providing the highest standards of customer service, as well as great value for money.

We pride ourselves in having a motivated team who are knowledgeable, friendly and passionate about Hull Trains. Our staff ensure that we operate in a safe manner and they are expected to be helpful and proactive in serving you. We are committed to our customers and to providing excellent service. We value customers' opinions and we welcome your feedback and views.

Our team are encouraged to use their common sense and discretion in dealing with individual situations on their own merits so that every customer is given the best service that we can possibly offer.

Occasionally, though things do go wrong, and we do our best to resolve any issues as quickly as we can. This document is our Complaints Handling Procedure (CHP) which sets out our standards for receiving feedback, how we manage your concerns to ensure that we learn from our mistakes and how we address the issue(s) that you have raised. The procedure includes:

- How to contact us.
- How we will make it as easy as possible for you to talk to us.
- How we will respond to your complaint and when we will respond.
- How we will deal with your complaint fairly.
- When you can expect compensation.
- How we will respect our customers confidentiality.
- How we will monitor and review the feedback you provide us.
- What action we have taken to address the issues and make improvements.

This process does not affect your legal rights, which are set out in the National Rail Conditions of Carriage at nationalrail.co.uk/times_fares/46427.aspx . Further copies of this procedure and our Passengers' Charter can be obtained from all the staffed stations at which our trains call or from our Customer Relations team who can be contact in a variety of ways as detailed later in this document.

2. What is our Complaints Handling Procedure?

A complaint can be described as follows:

"A complaint is an expression of dissatisfaction by a customer or potential customer about service delivery or about company or industry policy."

Every time you are not satisfied with Hull Trains (HT) our staff will take your comments seriously and respond quickly and positively.

Customers may share comments about our service verbally, by letter, email, social media and by telephone. We will respond to feedback in a constructive, fair and reasonable manner. We will also look at ways that can improve the service that we deliver to our customers.

We understand that not everything will always run smoothly, however we appreciate that it is the manner by which we respond to such issues that creates goodwill and customer loyalty. Your feedback also helps us to improve our business.

This Complaints Handling Procedure is one way that we can help in making a difference to the customer experience.

Our Complaints Handling Procedure will:

- Be easily accessible, well publicised and easy to use.
- Ensure efficient handling of a complaint and provide a response within publicised targets.
- Ensure full and fair investigations.
- Observe HT Passenger's Charter promises.
- Respect people's desire for confidentiality in line with the Data Protection Act.
- Provide feedback to the HT management team so that improvements can be made.

Our commitment to all customers

We will respond and apologise to customers who complain through a number of means; in person, by letter, telephone, email or social media.

We will also apologise to customers who have not complained but who have also suffered serious disruption or an unpleasant experience on their journey with us. We will endeavour to do this using announcements on-train or in exceptional cases by distributing letters or notices on board the train or at stations.

In exceptional cases we may also apologise through the press and media where appropriate.

3. How can you get in touch?

An Accessible Immediate Response

If you have a complaint about the service we provide on any aspect of your booking or journey we can help you. In many situations our team can help to resolve the problem there and then. We encourage our customer facing colleagues to resolve problems for you in this way.

If our front line employees are unable to resolve your issue then their respective supervisor or manager may also be able to help you and provide you with an immediate response or solution.

We have a employee empowerment scheme which gives our customer facing colleagues the ability to smooth things over when things go wrong, such as a free cup of coffee during service issues or a complimentary first class upgrade. We'd love to hear your feedback about this scheme if our team have used it with you.

Our Customer Relations Team

We understand that not all issues can be resolved immediately to your satisfaction. To ensure that your complaint is heard we have a small dedicated team of advisors to listen to your comment or complaint and resolve the issues that you wish to raise.

We have a number of ways in which our Customer Relations Team can be contacted to make it easier for you. Our contact details are available:

- On our website at hulltrains.co.uk/customer-services/
- On station and train posters.
- In our printed timetable and contained in our Passenger's Charter available on train, at stations and online at hulltrains.co.uk/customer-services/passenger-charter/
- On customer feedback forms available on train and at stations.
- On social media, via Facebook and Twitter.
- In local phone directories.
- Via National Rail Enquiries.

When contacting our team we will need your name, contact details and the details of your complaint, including the train journey, staff members and/or dates of travel. If referring to lost property we would also need a full description of the items lost. We will take note of verbal complaints, but only action those where a written response is required and in doing so we would ask that you make it clear to our team that you require a response, as well as providing the information required above.

Where English is not your first language we will make best efforts to assist you where we can.

Contact Details

By Telephone

The Customer Relations team can be contacted by telephone from 0900 – 1700 on 03450 710222 (option 4, then option 3) and the number is a 'lo-call' number. Please note that 03 numbers can be accessed from mobiles in addition to landlines without incurring a premium rate.

Our Customer Relations team are available between 0900 and 1700 from Monday to Friday (except bank holidays) to manage any comment or complaint that you would like to make about us and our services.

Outside these hours a voice message will advise customers of opening hours and will offer the email contact address as an alternative or the option to leave a message. If you do leave a message please leave your name, contact number and a short message about the query. Customer Relations are closed on bank holidays, Christmas Day and Boxing Day and operates slightly reduced hours on Christmas Eve and New Year's Eve. Details of reduced opening times will be published in advance on our website.

For website booking support, the team can be contacted by telephone on 0371 244 1638 and for our Group Travel and Business Travel team on 01482 215746.

Assisted Travel Team

We have a dedicated Assisted Travel team who are available from 06:00 – 23:00 every day except Christmas Day when the service is closed. On Boxing Day they are open from 08:00 until 18:00. They can be contacted on the Freephone number 0800 316 1323.

They can also be contacted by Textphone on 18001 0800 316 1323. The Textphone service connects people using a textphone with other people using a telephone or another textphone. It's a fully automated service so, when required, relay assistants provide a text-to-voice and voice-to-text translation service. For more information please see the 'Next Generation Text' website ngts.org.uk/ or download the NGT app.

Requests for assistance can also be made through our website by a request for. This can be located at the following website address, hulltrains.co.uk/contact-us/assisted-travel-form/

Our team will provide an acknowledgement by email when your requested assistance has been successfully booked.

Alternative format documents are also available from our Customer Relations team. Our 'Disabled Persons Protection Policy, including our 'Making Rail Accessible' documents, outline

our policy and practices to enable our disabled and elderly customers to travel with us easily and recognising their needs. It can be found on our website at hulltrains.co.uk

In Writing

We welcome your views and you may write to us using our freepost address as follows:

Hull Trains Customer Relations
FREEPOST RLYY-XSTG-YXCK
4th Floor
Europa House
184 Ferensway
Hull
HU1 3UT

Customer comments forms are available from all the staffed stations at which we call and from our on train crew.

By Email or through our Website

You may also email your comment or complaint to the Customer Relations team at customer.services@hulltrains.co.uk.

Our website also has a 'feedback' facility to allow you to email your complaint or comment direct to our team. All emails will be provided with an automatic acknowledgement of receipt and we aim to respond within 5 working days to all email contacts. As mentioned below in Section 4, when there is an unexpected sudden increase in the volume of complaints being received, it may take longer for us to respond, but we will let you know this, including any revised timescales.

For website booking support, the team can be contacted at fht.websupport@firstgroup.com.

Through Social Media

We operate a 24 hour Twitter function @Hull_Trains. Comments, suggestions, help and assistance can be sought through this channel. Complaints are also recorded and, if these cannot be addressed immediately, they are passed on to the Customer Relations team for recording and a full response to be provided. We aim to respond to all tweets that ask for a response.

Every four weeks the digital contacts are analysed and the sentiments studied. These are then reported to the Hull Trains Company Board.

At Meet the Manager Sessions

We regularly attend local and regional rail user group meetings and events. The team will help with customer queries and also address any complaints that customer may have.

Members of our management team also attend 'Meet the Manager' sessions held at the stations that we serve.

Additionally, we offer 'Meet the Manager' sessions on our trains. We welcome the opportunity to meet customers and for you to share your views. When necessary a full reply will be provided by the Customer Relations team or the appropriate manager.

4. What response times should you expect?

At Hull Trains, we are committed to responding to your comment or complaint as quickly as possible. We guarantee that we will respond in the following timescales:

- For written complaints, whether by mail or e-mail we will provide an initial acknowledgement within 5 working days of receipt. We will provide a full reply within 20 working days should it take longer to research and investigate the issues that you have raised. We will keep you informed of the expected response date.
- HT aim to finalise, to a satisfactory conclusion, 90% of comments and complaints within 5 working days.
- We aim to finalise 95% of comments and complaints within 20 working days to a satisfactory conclusion. If we are unable to conclude the investigation at this time a further holding letter will be sent together with an update every 10 days until the case is concluded.

We will use reasonable endeavours to keep to our promised response rates. When there is an unexpected sudden increase in the volume of complaints being received we will initiate our plans to cope with these. This includes utilising internal resources from other departments, as well as using external support where required. We also commit to informing the ORR, Transport Focus and London TravelWatch including the reason(s) why. We will give these bodies;

- an indication of the expected duration of the emergency timescales.
- an outline of our plans to deal with the large volumes.
- an outline of the procedures in place to ensure the quality of responses is maintained.
- detail on any steps taken to advise affected complainants.

We are committed to the ATOC National Rail Standard for Customer Complaints and Correspondence involving two or more Rail Service Providers.

Any complaint or claim referring to another operator's services, Network Rail or other agencies, will be acknowledged and passed on within 5 working days of receipt. We will ensure that the customer is advised that this action has been taken. Should a complaint of this nature include an element referring to our service, we will deal with this within the timescales given above.

We aim to answer 75% of incoming telephone calls within 30 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.

We will investigate appeals raised by Transport Focus and respond within 20 working days. All appeal cases will be reviewed by the Director, Operations & Customer Experience.

5. How do we provide a Full and Fair Complaints Process and Investigation?

We will undertake a full and fair investigation into customer comments and complaints, involving management and senior management where appropriate, to ensure a consistent approach.

We will;

- ensure that we follow this Complaints Handling Procedure.
- make every effort to address all the issues raised in your complaint in our responses to you; giving you a personalised response.
- provide full and relevant explanations for the actions or policies being complained about.
- use clear, jargon-free English with correct spelling, grammar and punctuation.

We aim to satisfy your complaint with our first response and apologise when appropriate.

If you are unhappy with our first response and contact us again about it, a manager will review your complaint. A second response in writing will include the name and position of that manager and also explain the role of Transport Focus.

After the second response, if you remain unhappy in relation to your complaint, you are able to contact us again or contact Transport Focus. Transport Focus is an independent body set up by Parliament to protect rail users' interests. The organisation is able to review your complaint and make representation to us on your behalf. Transport Focus or London Travel Watch (for complaints about London Kings Cross and Stevenage) can be contacted as follows:

Transport Focus

Web: transportfocus.org.uk



Email: advice@transportfocus.org.uk

Tel: 0300 123 2350

Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ

PO Box 5594

Southend On Sea

SS1 9PZ



London TravelWatch
169 Union Street
London
SE1 0LL
Tel: 020 3176 2999
Twitter: @lontravelwatch
Email: Enquiries@londontravelwatch.org.uk
Web: londontravelwatch.org.uk

Please note that, in addition to this, the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulation 2015 requires us to advise you of an 'Alternative Dispute Resolution' organisation for your complaint. In our case this is The Consumer Ombudsman www.consumer-ombudsman.org. It should be noted however, that as Transport Focus 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.

All appeal cases received from Transport Focus will be reviewed by the Operations and Customer Service Director. We will investigate these appeals and will endeavour to respond within 5 working days. If a detailed investigation is needed, we will ensure that we provide a full response within 10 working days, or if your case is very complex, we will agree a longer response time with Transport Focus. Once you have raised an appeal with Transport Focus, we are required to stop all correspondence with you until Transport Focus have concluded the appeal. This does not of course stop you from contacting us about other issues.

We reserve the right to terminate any correspondence or communication that could be construed as abusive or bullying in content, voluminous, frivolous or vexatious, and which specifically diverts resources and affects key areas of the customer relations area of operations. Complaints of this nature will always be recorded in our systems and a senior manager will investigate and review them, responding to the complainant and advising them of ADR organisations as detailed above.

Our Customer Relations Team will handle any comment or complaint that requires an internal investigation. All our investigations will be fair and thorough.

We will ensure that we will;

- thoroughly check the facts
- ensure that we show no bias towards anyone involved in the complaint.
- obtain a response from all the appropriate staff and suppliers concerned.

Following this process allows us to provide a full response including information on the outcome of the internal investigation and what actions have been taken to improve our services. We will also detail any compensation that we may be offering to you.

To comply with Data Protection legislation, we are unable to share personal details of the actions taken against any member of staff following a customer complaint.

Unreasonable, aggressive or abusive customers

We will follow this Complaints Handling Procedure and treat customers with courtesy and respect. Our team are here to help you in every way that we can.

If you feel that the reply provided by us has not met with your expectations we understand that you may find this upsetting. You have every right to express your views in a courteous and mutually respectful manner.

We operate a zero tolerance policy concerning verbal abuse and aggressive behaviour. Should we feel that any customers conduct has breached this tolerance we reserve the right to terminate correspondence or communications.

6. The Quality of our Reply

Whenever you complain to us, our aim is to resolve the issue for you the first time you contact us. Where possible, a complaint will be handled by one member of the Customer Relations team from receipt to reply. All complaints including those involving staff conduct and safety related matters will be fully and fairly investigated.

If a complaint refers to more than one train operator we will agree with that train operator which company will respond. We will tell you which company is taking the lead in replying to your concerns.

We will pass on any complaints wholly regarding another train operator, and we will tell you which train operator is to reply to your complaint and how to contact them should you not receive it. If necessary your complaints will be referred to any of our industry partners for their feedback, this may include organisations such as Network Rail, Passenger Transport Executives, Transport Focus, web ticketing retailers etc. We will always advise you of any referral that has been made. In a similar way we expect other train operators to pass complaints relating to our business on to us and inform our customers that this action has been taken.

We monitor the number of customers who contact us again who are unhappy about the way their complaint has been handled, on a four-weekly basis. We will identify the reasons why customers are unhappy with the way their complaint has been handled and seek to improve this.

Employee Training

For all our colleagues we have a 'Welcome to Excellence' training course which is designed to teach and enhance their customer service skills. At the end of the course attendees are given the option to undertake a short exam which gives successful candidates an NVQ and is accredited by City and Guilds.

We also undertake localised initial training for all complaints handling staff which includes:

- Briefing in how we approach and resolve complaints.
- Training in use of our Customer Relations system.
- Training in use of making BACS (monetary banking payments).
- Compliance to Data Protection Act legislation.
- Familiarisation with customisable response templates.

Our internal performance review process ensures that we set our complaints handling team clear objectives and give the opportunity to create action plans and offer support where our standards are not met by an individual.

Compensation

We will offer compensation when appropriate (normally in the form of a BACS transfer, cheque or National Rail travel vouchers if preferred) and in line with our Passengers' Charter. Compensation is paid when our train services are delayed or disrupted by 30 minutes or more. We treat each case on its own merits and provide compensation in line with the National Conditions of Carriage which can be found at nationalrail.co.uk/static/documents/content/NRCOC.pdf . Where a customer is not entitled to compensation we will inform them of this and the reason why. Copies of the Passengers' Charter may be obtained at stations which we serve, online at hulltrains.co.uk and are also on request from Customer Relations, in standard print, large print, audio, Braille and Easy Read.

We may also consider appropriate goodwill gestures on an ex-gratia basis when we haven't been able to fulfil our normal service promise to you.

7. Our Commitment to Confidentiality

This procedure will ensure that your confidentiality is protected. Your personal details or details about your complaint will not be divulged to third parties unless we have your written consent except under the circumstances detailed below.

We may divulge some or all of your details to a third party without consent where it is necessary for us to fulfil our own legal obligations, (this will include bodies such as other train operating companies and insurers or to any such body in carrying out their statutory duties, e.g. the British Transport Police).

Where Transport Focus are involved in a customer complaint, whilst they will not require personal details to be provided, (as they will already have this from you, the customer), they may occasionally request copies of correspondence and information relating to individual complaints. The provision of this information to Transport Focus is covered in their CHP, therefore customers consent to Transport Focus obtaining this information from ourselves when they ask Transport Focus to review their complaint.

We will pass on some or all of your details for quality control purposes to our Regulator, (the Office of Rail and Road), and your watchdog, (Transport Focus). This is because they audit our work and carry out research into customer satisfaction with complaints. Only a sample of complaints made to us are audited. If you do not want to be contacted, you may opt out of this by letting us know when you complain to us.

If you can't make a complaint yourself but want your carer, support worker, guardian or other agent to act as your advocate, we can arrange this whilst still protecting your data confidentiality and theirs.

For more information on how we store, handle and use your data, and how you can get access to any data we hold about you, please see our privacy policy on our website at hulltrains.co.uk/privacy-policy.

Record Keeping

We keep written and electronic correspondence for 2 years. We also use a Customer Relationship Management system to help manage and provide statistical information about the complaints and praise we receive.

8. How Do We Monitor and Report Customer Feedback?

We recognise that our customers can tell us everything that we need to know to improve the services that we deliver, therefore your feedback is vital and we encourage this in every possible form. Your comments help us to identify areas where we can improve immediately and both in the short and long term.

To ensure that this feedback helps to drive improvements we will monitor and report contacts in the following ways:

- The HT Customer Relations team will provide weekly reports on the volume of complaints and also the causes for the complaint. These reports are shared with the Executive Management Team and also our colleagues. These Key Performance reports include the response times for the handling of complaints and analysis of key trends.
- Every week, a member of our Executive Team performs a quality check of a minimum 5% sample of our compensation claim responses and our customer complaints to ensure all customer communications are of a high standard.
- Every four weeks our complaints are shared with the Company Board, along with details of the steps taken to mitigate these issues.
- We will provide information in the format and at the intervals required by the Office of Rail and Road (ORR) on the number of comments and complaints we receive, and our performance in dealing with them.

Claims for Losses, Property Damage and Personal Injury

If you wish to make a claim against Hull Trains for losses, property damage or personal injury this should be made in writing to the Customer Relations team who will ensure it is forwarded to our claims handling team. Your claim will then be dealt with in accordance with the Claims Allocation and Handling Agreement (CAHA).

If there are safety implications the details will be passed on to the appropriate department for action to be taken immediately.

Continuous Improvement

We use your feedback, both positive and negative to inform our company strategy, making changes in the shorter term where we can and using it to inform our longer term cyclical business planning processes. We welcome any ideas or suggestions you may have and actively encourage these through our Customer Ideas section at hulltrains.co.uk/customer-services/your-ideas/

Reviewing Our Complaints Handling Procedure

Our Complaints Handling Procedure will be reviewed each year in consultation with Transport Focus and other relevant bodies by our Business Development Manager. We will not alter this procedure without prior consultation with these bodies and prior agreement from the ORR.



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Customer Complaints Handling Procedure

Valid from 1st August 2016 until further notice



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- On station and train posters.
- In our printed timetable and contained in our Passenger's Charter available on train, at stations and online at hulltrains.co.uk/customer-services/passenger-charter/
- On customer feedback forms available on train and at stations.
- On social media, via Facebook and Twitter.
- In local phone directories.
- Via National Rail Enquiries.

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Assisted Travel Team

We have a dedicated Assisted Travel team who are available from 06:00 – 23:00 every day except Christmas Day when the service is closed. On Boxing Day they are open from 08:00 until 18:00. They can be contacted on the Freephone number 0800 316 1323.

They can also be contacted by Textphone on 18001 0800 316 1323. The Textphone service connects people using a textphone with other people using a telephone or another textphone. It's a fully automated service so, when required, relay assistants provide a text-to-voice and voice-to-text translation service. For more information please see the 'Next Generation Text' website ngts.org.uk/ or download the NGT app.

Requests for assistance can also be made through our website by a request for. This can be located at the following website address, hulltrains.co.uk/contact-us/assisted-travel-form/

Our team will provide an acknowledgement by email when your requested assistance has been successfully booked.

Alternative format documents are also available from our Customer Relations team. Our 'Disabled Persons Protection Policy, including our 'Making Rail Accessible' documents, outline

our policy and practices to enable our disabled and elderly customers to travel with us easily and recognising their needs. It can be found on our website at hulltrains.co.uk

In Writing

We welcome your views and you may write to us using our freepost address as follows:

Hull Trains Customer Relations
FREEPOST RLYY-XSTG-YXCK
4th Floor
Europa House
184 Ferensway
Hull
HU1 3UT

Customer comments forms are available from all the staffed stations at which we call and from our on train crew.

By Email or through our Website

You may also email your comment or complaint to the Customer Relations team at customer.services@hulltrains.co.uk.

Our website also has a 'feedback' facility to allow you to email your complaint or comment direct to our team. All emails will be provided with an automatic acknowledgement of receipt and we aim to respond within 5 working days to all email contacts. As mentioned below in Section 4, when there is an unexpected sudden increase in the volume of complaints being received, it may take longer for us to respond, but we will let you know this, including any revised timescales.

For website booking support, the team can be contacted at fht.websupport@firstgroup.com.

Through Social Media

We operate a 24 hour Twitter function @Hull_Trains. Comments, suggestions, help and assistance can be sought through this channel. Complaints are also recorded and, if these cannot be addressed immediately, they are passed on to the Customer Relations team for recording and a full response to be provided. We aim to respond to all tweets that ask for a response.

Every four weeks the digital contacts are analysed and the sentiments studied. These are then reported to the Hull Trains Company Board.

At Meet the Manager Sessions

We regularly attend local and regional rail user group meetings and events. The team will help with customer queries and also address any complaints that customer may have.

Members of our management team also attend 'Meet the Manager' sessions held at the stations that we serve.

Additionally, we offer 'Meet the Manager' sessions on our trains. We welcome the opportunity to meet customers and for you to share your views. When necessary a full reply will be provided by the Customer Relations team or the appropriate manager.

4. What response times should you expect?

At Hull Trains, we are committed to responding to your comment or complaint as quickly as possible. We guarantee that we will respond in the following timescales:

- For written complaints, whether by mail or e-mail we will provide an initial acknowledgement within 5 working days of receipt. We will provide a full reply within 20 working days should it take longer to research and investigate the issues that you have raised. We will keep you informed of the expected response date.
- HT aim to finalise, to a satisfactory conclusion, 90% of comments and complaints within 5 working days.
- We aim to finalise 95% of comments and complaints within 20 working days to a satisfactory conclusion. If we are unable to conclude the investigation at this time a further holding letter will be sent together with an update every 10 days until the case is concluded.

We will use reasonable endeavours to keep to our promised response rates. When there is an unexpected sudden increase in the volume of complaints being received we will initiate our plans to cope with these. This includes utilising internal resources from other departments, as well as using external support where required. We also commit to informing the ORR, Transport Focus and London TravelWatch including the reason(s) why. We will give these bodies;

- an indication of the expected duration of the emergency timescales.
- an outline of our plans to deal with the large volumes.
- an outline of the procedures in place to ensure the quality of responses is maintained.
- detail on any steps taken to advise affected complainants.

We are committed to the ATOC National Rail Standard for Customer Complaints and Correspondence involving two or more Rail Service Providers.

Any complaint or claim referring to another operator's services, Network Rail or other agencies, will be acknowledged and passed on within 5 working days of receipt. We will ensure that the customer is advised that this action has been taken. Should a complaint of this nature include an element referring to our service, we will deal with this within the timescales given above.

We aim to answer 75% of incoming telephone calls within 30 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.

We will investigate appeals raised by Transport Focus and respond within 20 working days. All appeal cases will be reviewed by the Director, Operations & Customer Experience.

5. How do we provide a Full and Fair Complaints Process and Investigation?

We will undertake a full and fair investigation into customer comments and complaints, involving management and senior management where appropriate, to ensure a consistent approach.

We will;

- ensure that we follow this Complaints Handling Procedure.
- make every effort to address all the issues raised in your complaint in our responses to you; giving you a personalised response.
- provide full and relevant explanations for the actions or policies being complained about.
- use clear, jargon-free English with correct spelling, grammar and punctuation.

We aim to satisfy your complaint with our first response and apologise when appropriate.

If you are unhappy with our first response and contact us again about it, a manager will review your complaint. A second response in writing will include the name and position of that manager and also explain the role of Transport Focus.

After the second response, if you remain unhappy in relation to your complaint, you are able to contact us again or contact Transport Focus. Transport Focus is an independent body set up by Parliament to protect rail users' interests. The organisation is able to review your complaint and make representation to us on your behalf. Transport Focus or London Travel Watch (for complaints about London Kings Cross and Stevenage) can be contacted as follows:

Transport Focus

Web: transportfocus.org.uk



Email: advice@transportfocus.org.uk

Tel: 0300 123 2350

Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ

PO Box 5594

Southend On Sea

SS1 9PZ



London TravelWatch
169 Union Street
London
SE1 0LL
Tel: 020 3176 2999
Twitter: @lontravelwatch
Email: Enquiries@londontravelwatch.org.uk
Web: londontravelwatch.org.uk

Please note that, in addition to this, the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulation 2015 requires us to advise you of an 'Alternative Dispute Resolution' organisation for your complaint. In our case this is The Consumer Ombudsman www.consumer-ombudsman.org. It should be noted however, that as Transport Focus 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.

All appeal cases received from Transport Focus will be reviewed by the Operations and Customer Service Director. We will investigate these appeals and will endeavour to respond within 5 working days. If a detailed investigation is needed, we will ensure that we provide a full response within 10 working days, or if your case is very complex, we will agree a longer response time with Transport Focus. Once you have raised an appeal with Transport Focus, we are required to stop all correspondence with you until Transport Focus have concluded the appeal. This does not of course stop you from contacting us about other issues.

We reserve the right to terminate any correspondence or communication that could be construed as abusive or bullying in content, voluminous, frivolous or vexatious, and which specifically diverts resources and affects key areas of the customer relations area of operations. Complaints of this nature will always be recorded in our systems and a senior manager will investigate and review them, responding to the complainant and advising them of ADR organisations as detailed above.

Our Customer Relations Team will handle any comment or complaint that requires an internal investigation. All our investigations will be fair and thorough.

We will ensure that we will;

- thoroughly check the facts
- ensure that we show no bias towards anyone involved in the complaint.
- obtain a response from all the appropriate staff and suppliers concerned.

Following this process allows us to provide a full response including information on the outcome of the internal investigation and what actions have been taken to improve our services. We will also detail any compensation that we may be offering to you.

To comply with Data Protection legislation, we are unable to share personal details of the actions taken against any member of staff following a customer complaint.

Unreasonable, aggressive or abusive customers

We will follow this Complaints Handling Procedure and treat customers with courtesy and respect. Our team are here to help you in every way that we can.

If you feel that the reply provided by us has not met with your expectations we understand that you may find this upsetting. You have every right to express your views in a courteous and mutually respectful manner.

We operate a zero tolerance policy concerning verbal abuse and aggressive behaviour. Should we feel that any customers conduct has breached this tolerance we reserve the right to terminate correspondence or communications.

6. The Quality of our Reply

Whenever you complain to us, our aim is to resolve the issue for you the first time you contact us. Where possible, a complaint will be handled by one member of the Customer Relations team from receipt to reply. All complaints including those involving staff conduct and safety related matters will be fully and fairly investigated.

If a complaint refers to more than one train operator we will agree with that train operator which company will respond. We will tell you which company is taking the lead in replying to your concerns.

We will pass on any complaints wholly regarding another train operator, and we will tell you which train operator is to reply to your complaint and how to contact them should you not receive it. If necessary your complaints will be referred to any of our industry partners for their feedback, this may include organisations such as Network Rail, Passenger Transport Executives, Transport Focus, web ticketing retailers etc. We will always advise you of any referral that has been made. In a similar way we expect other train operators to pass complaints relating to our business on to us and inform our customers that this action has been taken.

We monitor the number of customers who contact us again who are unhappy about the way their complaint has been handled, on a four-weekly basis. We will identify the reasons why customers are unhappy with the way their complaint has been handled and seek to improve this.

Employee Training

For all our colleagues we have a 'Welcome to Excellence' training course which is designed to teach and enhance their customer service skills. At the end of the course attendees are given the option to undertake a short exam which gives successful candidates an NVQ and is accredited by City and Guilds.

We also undertake localised initial training for all complaints handling staff which includes:

- Briefing in how we approach and resolve complaints.
- Training in use of our Customer Relations system.
- Training in use of making BACS (monetary banking payments).
- Compliance to Data Protection Act legislation.
- Familiarisation with customisable response templates.

Our internal performance review process ensures that we set our complaints handling team clear objectives and give the opportunity to create action plans and offer support where our standards are not met by an individual.

Compensation

We will offer compensation when appropriate (normally in the form of a BACS transfer, cheque or National Rail travel vouchers if preferred) and in line with our Passengers' Charter. Compensation is paid when our train services are delayed or disrupted by 30 minutes or more. We treat each case on its own merits and provide compensation in line with the National Conditions of Carriage which can be found at nationalrail.co.uk/static/documents/content/NRCOC.pdf . Where a customer is not entitled to compensation we will inform them of this and the reason why. Copies of the Passengers' Charter may be obtained at stations which we serve, online at hulltrains.co.uk and are also on request from Customer Relations, in standard print, large print, audio, Braille and Easy Read.

We may also consider appropriate goodwill gestures on an ex-gratia basis when we haven't been able to fulfil our normal service promise to you.

7. Our Commitment to Confidentiality

This procedure will ensure that your confidentiality is protected. Your personal details or details about your complaint will not be divulged to third parties unless we have your written consent except under the circumstances detailed below.

We may divulge some or all of your details to a third party without consent where it is necessary for us to fulfil our own legal obligations, (this will include bodies such as other train operating companies and insurers or to any such body in carrying out their statutory duties, e.g. the British Transport Police).

Where Transport Focus are involved in a customer complaint, whilst they will not require personal details to be provided, (as they will already have this from you, the customer), they may occasionally request copies of correspondence and information relating to individual complaints. The provision of this information to Transport Focus is covered in their CHP, therefore customers consent to Transport Focus obtaining this information from ourselves when they ask Transport Focus to review their complaint.

We will pass on some or all of your details for quality control purposes to our Regulator, (the Office of Rail and Road), and your watchdog, (Transport Focus). This is because they audit our work and carry out research into customer satisfaction with complaints. Only a sample of complaints made to us are audited. If you do not want to be contacted, you may opt out of this by letting us know when you complain to us.

If you can't make a complaint yourself but want your carer, support worker, guardian or other agent to act as your advocate, we can arrange this whilst still protecting your data confidentiality and theirs.

For more information on how we store, handle and use your data, and how you can get access to any data we hold about you, please see our privacy policy on our website at hulltrains.co.uk/privacy-policy.

Record Keeping

We keep written and electronic correspondence for 2 years. We also use a Customer Relationship Management system to help manage and provide statistical information about the complaints and praise we receive.

8. How Do We Monitor and Report Customer Feedback?

We recognise that our customers can tell us everything that we need to know to improve the services that we deliver, therefore your feedback is vital and we encourage this in every possible form. Your comments help us to identify areas where we can improve immediately and both in the short and long term.

To ensure that this feedback helps to drive improvements we will monitor and report contacts in the following ways:

- The HT Customer Relations team will provide weekly reports on the volume of complaints and also the causes for the complaint. These reports are shared with the Executive Management Team and also our colleagues. These Key Performance reports include the response times for the handling of complaints and analysis of key trends.
- Every week, a member of our Executive Team performs a quality check of a minimum 5% sample of our compensation claim responses and our customer complaints to ensure all customer communications are of a high standard.
- Every four weeks our complaints are shared with the Company Board, along with details of the steps taken to mitigate these issues.
- We will provide information in the format and at the intervals required by the Office of Rail and Road (ORR) on the number of comments and complaints we receive, and our performance in dealing with them.

Claims for Losses, Property Damage and Personal Injury

If you wish to make a claim against Hull Trains for losses, property damage or personal injury this should be made in writing to the Customer Relations team who will ensure it is forwarded to our claims handling team. Your claim will then be dealt with in accordance with the Claims Allocation and Handling Agreement (CAHA).

If there are safety implications the details will be passed on to the appropriate department for action to be taken immediately.

Continuous Improvement

We use your feedback, both positive and negative to inform our company strategy, making changes in the shorter term where we can and using it to inform our longer term cyclical business planning processes. We welcome any ideas or suggestions you may have and actively encourage these through our Customer Ideas section at hulltrains.co.uk/customer-services/your-ideas/

Reviewing Our Complaints Handling Procedure

Our Complaints Handling Procedure will be reviewed each year in consultation with Transport Focus and other relevant bodies by our Business Development Manager. We will not alter this procedure without prior consultation with these bodies and prior agreement from the ORR.