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06 October 2016

Jamie Burles
Managing Director
Greater Anglia

Dear Jamie

Approval of Abellio East Anglia Limited (Trading as Greater Anglia) Complaints Handling Procedure (Condition 6 of your Station Licence and 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 station licence and GB Statement of National Regulatory Conditions: Passenger (SNRP). We also sought views on your draft CHP from Transport Focus and London TravelWatch.

We welcome your target of responding to 90% of complaints within 10 working days, which we believe will be positive for passengers.

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.



You have confirmed that you will be creating a new website for the franchise which will go live on 16 October. You have confirmed that links to your information on complaints will be provided within 2 clicks of the homepage and contain all of the relevant information, including information on your service standards and a link to your CHP. Please provide us with confirmation when the new website is live.

Yours sincerely,



Annette Egginton

Customer complaints handling procedure

October 2016



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1. Customer complaints handling procedure

1.1 Introduction

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

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

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

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

Greater Anglia believes that all customer feedback should be seen as constructive and should be used to maintain and where possible improve the service and products offered. We will ensure that the process for contacting us is easily accessible, well publicised and easy to use. To help we have an outline document which highlights the key areas of interest.

1.2 Principles

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

All complaints and claims will be dealt with in accordance with our Passenger's Charter (see greateranglia.co.uk/about-us/our-performance/passengers-charter).

We will ensure that all relevant Greater Anglia customer service employees (all those who come into daily contact with customers) are competent in dealing with customer complaints acting wherever possible to finalise the complaint, referring complaints to the Contact Centre or to higher authority only when this is not possible. All Greater Anglia employees will receive training and coaching in order to achieve the correct level of competence.

1.3 Confidentiality

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

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

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

2. The train service offered

Greater Anglia operates trains throughout East Anglia on the routes serving London Liverpool Street, Cambridge, Norwich, Colchester, Southend-on-Sea and Stansted Airport and their environs.

3. The Greater Anglia Contact Centre

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

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

The Contact Centre is open during the following times:

- 0800 – 2000 Monday to Saturday
- 1000 – 2000 Sundays
- 0900 – 1800 Bank Holidays

The Contact Centre is not open on Christmas Day and Boxing Day.

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

The address of the Greater Anglia Contact Centre is:

Greater Anglia Contact Centre
Norwich Railway Station
Station Approach
Norwich NR1 1EF
Telephone 0345 600 7245
Fax 01603 675243
Email contactcentre@greateranglia.co.uk
Twitter @greateranglia or @stansted_exp
Website greateranglia.co.uk

Customers should note that all calls to our 0345 number are charged at the same rate irrespective of your call being from a landline or mobile telephone.

Details of how to contact the company are published in the following ways:

- On the Greater Anglia website greateranglia.co.uk
- Social Media. We recognise that more people use social media. We have a Facebook page (facebook.com/GreaterAnglia) and a popular Twitter feed (@greateranglia or @stansted_exp) which is manned 7 days a week. Any complaints requiring a fulsome or detailed and personal response will be sent to the Contact Centre. Alternatively our Social Media team may send you a link so you can get in touch with the Contact Centre team.
- In local telephone directories.
- All marketing literature, including customer magazines.

- On 'Station Information' posters displayed at all stations managed by Greater Anglia which will show the address, telephone and email addresses of the Contact Centre and the contact details of Transport Focus and London TravelWatch. At stations managed by Greater Anglia, but where other train operators call, the contact details of those operators will also be shown.
- On posters in every carriage of each train of the Greater Anglia fleet which will show the address, telephone and email addresses of the Contact Centre and the contact details of Transport Focus and London TravelWatch.
- Within the Greater Anglia Passenger's Charter (see greateranglia.co.uk/about-us/our-performance/passengers-charter).

4. Methods of comment/complaint

4.1 In person

If a customer wishes to comment or complain they are encouraged to speak to any Greater Anglia employee whether at a station or on a train. The employee is expected to try to resolve any problem immediately wherever possible. In some cases our employees may need to refer the customer to a local supervisor or manager so they can resolve the problem.

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

At stations which are not managed by Greater Anglia, customers may approach any Greater Anglia employee to comment or complain. If the nature of the complaint or comment makes it necessary, a process of referral to Greater Anglia has been agreed with other train operators.

Key information can help us resolve matters more promptly and bring matters to a close. When you get in touch please let us know:

- dates;
- time of travel;
- stations used;
- any other relevant information.

4.2 By customer comments/complaints form

Customer comments/complaints forms are available on request from all Greater Anglia ticket offices and other train company ticket offices within the area where Greater Anglia operates. Where Cafe Bar hosts are present on our Mainline trains, they or the conductors on paytrain or Intercity services can give customers a comment form.

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

4.3 Direct & indirect contact in writing, email or by telephone

Customers may make direct contact in writing, by email, by telephone or by fax, or via the website to the Contact Centre with or without a comment form. Customers may also contact us using the webform available on the Greater Anglia website. The contact details are shown in Section 3. Correspondence received by the Contact Centre will be registered on the database and be dealt with in the order in which it is received.

The details of customers may also be forwarded to the Contact Centre by other train companies, Transport Focus or London TravelWatch and by National Rail Enquiries in order for us to fulfil our obligation to respond to you. This may happen if a journey involves more than one train operator or if your case is escalated to Transport Focus or London TravelWatch.

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

For customers who use textphone or minicom services, please prefix your call through to our main advertised number with 18001 to communicate with Typetalk services, during the times that our Contact Centre is open.

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

Where a carer, support worker, or guardian contacts us, acting on behalf of a customer and with their permission, we will need to be satisfied that the request is made on behalf of another party. We may ask for evidence of this entitlement but it will not prevent us from ensuring that any necessary investigations are made.

5. Response

5.1 Normal response

Greater Anglia will aim to answer 95% of comments and complaints within 20 working days and sets a target of 90% to be answered in 10 working days. In accordance with our Passenger's Charter (see greateranglia.co.uk/about-us/our-performance/passengers-charter), if a complaint cannot be finalised at the time and has entered the formal system, then an acknowledgement will be sent to the customer within five working days. We will make reasonable endeavours to ensure we meet our response times even when there is an unexpected increase in the volume of complaints received. However if there are exceptional circumstances, such as a period of major disruption, we may increase these response times. We will work closely with Transport Focus and London TravelWatch if our response times are extended. We will also ensure we advise the ORR when we anticipate an increase to response rates. We will notify customers via our website greateranglia.co.uk if this is the case and make every effort to respond to you as soon as we can.

Our objectives are:

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

5.2 Complaint escalation procedure

When a customer is dissatisfied with an initial response and they contact the Contact Centre again, the complaint will be referred to a senior person who has not previously been involved in the case to undertake a review of the complaint. We will provide our customers with contact details for London TravelWatch and/or Transport Focus in our second substantive response, irrespective of the outcome of the complaint or our response. Where a complaint, which has already been addressed by the Contact Centre, is referred to Greater Anglia by either Transport Focus or London TravelWatch, a further review in consultation with Transport Focus or London TravelWatch will be undertaken by a dedicated person. For further escalations from this point you can ask Transport Focus or London TravelWatch to help and advise. Transport Focus is an independent body in place to protect and represent passenger transport users. London TravelWatch operate similarly for transport users in and around London. Contact details are shown in section 9.2.

5.3 Investigation

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

If detailed investigations are required, we will let you know if there is a delay and keep you updated. Greater Anglia will acknowledge the complaint within five working days and a full reply will be sent within 20 working days.

5.4 Frivolous and vexatious complaints

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

6. Redress/compensation

6.1 Forms of recompense will normally be one of the following

- National Rail travel vouchers for full or part payment towards a future journey anywhere on the National Rail network.
- Cheque
- PayPal
- Credit and debit cards
- Complimentary tickets

Recompense will be guided by Greater Anglia's Passenger's Charter.

We will comply with the Consumer Rights Act 2015.

6.2 Individual claims

Individual claims for recompense will be dealt with in line with the National Rail Conditions of Travel and Greater Anglia's Passenger's Charter (greateranglia.co.uk/about-us/our-performance/passengers-charter), taking into account such factors as the nature of the complaint, the fare paid and any other extenuating circumstances (greateranglia.co.uk/NCOT).

When we get back in touch with you, we will let you know if you have an entitlement to compensation, and ensure that this is paid to you.

6.3 Minimum levels

The commitments within the Greater Anglia Passenger's Charter will determine the minimum level of recompense.

7. Handling claims

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

7.1 Lost property

There is nothing worse than leaving things behind. We want to reunite our passengers with their lost or mislaid items as quickly as possible.

If you think that you've left something on one of our trains or at one of our stations, contact us and we'll search all of the items handed in.

To report a lost item either:

Use our online lost property contact form

Call our Lost Property team on 0345 600 7245 (option 7) and speak to an advisor (open 0900 to 1700, Monday to Friday. Answerphone 24hrs).

Email us at lostproperty@greateranglia.co.uk

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

- Your departure and destination stations
- The time of your journey

- A good description of your lost item including size, color, make and any distinguishing features
- Where on the train you left the item
- Your name and contact number

See (greateranglia.co.uk/travel-information/your-journey/lost-property) for more detail.

8. Complaints relating to other operating companies

Greater Anglia commits to following the ATOC National Rail Standard for customer complaints and correspondence involving two or more Rail Service Providers.

8.1 Individual train companies

In line with the ATOC National Rail Standard, complaints referring or relating to another train company will be acknowledged in the normal way. The customer will be advised that their comments have been sent on and a contact address will be given. The correspondence will be forwarded to the relevant company within five working days of receipt for them to respond direct.

8.2 Several train companies

In line with the ATOC National Rail Standard, in cases referred to Greater Anglia where Greater Anglia and more than one other company is involved the Greater Anglia Contact Centre will forward a copy of the letter within five working days to each of the other operators, making it clear that they need to respond to the customer in respect of the part of the complaint which relates to their area of responsibility and reply to the customer in respect of the complaint relating to its own services. The Contact Centre team will also provide the name and address of the customer relations department of each of the other operators. In addition to this standard, where we can resolve a customer complaint within our own response we will endeavour to do so as we believe this represents good customer service.

9. Customer satisfaction

9.1 Statistical feedback

Statistical feedback taken from Greater Anglia's Contact Centre database is shared with the Greater Anglia Leadership and Customer Service team on a weekly basis, and will be provided each 4-week period to the Greater Anglia executive group. A category will be included to show the numbers of customers dissatisfied with the initial response given. Feedback will also be used at specific Customer Service improvement groups and may be shared with the Passenger Panels.

Greater Anglia will provide information in the format and at intervals required by the ORR on the number of comments and complaints received, and our performance in dealing with them, to the Office of Rail and Road, Transport Focus or London TravelWatch and the DfT.

9.2 What happens if you are not satisfied with us?

We will do everything possible to ensure we deliver a high standard of service and respond to your needs, and will adhere to the National Rail Conditions of Travel and our Passenger's Charter. However, if you have already contacted Greater Anglia and are not happy with our response, you can contact Transport Focus or London TravelWatch, the independent passenger 'watchdogs', who will review your case and – if they consider it appropriate – follow things up with us on your behalf. Alternatively you may wish to raise your complaint through the Alternative Dispute Resolution Service (European Commission Online Dispute Resolution Platform). They can be contacted via a link on our website – see greateranglia.co.uk/contact-us/contact-directory

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

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

We cannot handle penalty fare appeals. Please contact IRCAS as detailed on the next page.

Transport Focus

You can contact Transport Focus about any issue, except those that are wholly to do with the following routes: Stansted Airport to London; Hertford East, Cheshunt to London or Stratford.

Website: transportfocus.org.uk

Email: advice@transportfocus.org.uk

Telephone: 0300 123 2350

Twitter: @TransportFocus

Transport Focus

FREEPOST RTEH-XAGE-BYKZ

PO Box 5594

Southend-on-Sea

SS1 9PZ

London TravelWatch

You can contact London TravelWatch about any issue that is wholly to do with the following routes: Stansted Airport to London; Hertford East, Cheshunt to London or Stratford.

London TravelWatch

169 Union Street

London

SE1 0LL

Telephone 020 3176 2999

Fax 020 3176 5991

Email enquiries@londontravelwatch.org.uk

Website londontravelwatch.org.uk

Other useful contacts

If you have received a Penalty Fare notice please refer to the appeals body detailed on the notice. You can find contact details and how to appeal or pay a notice at ircas.co.uk or write to The Independent Appeals Service, PO BOX 212, Petersfield GU32 9BQ.

10. Review of procedure

10.1 Transport Focus or London TravelWatch

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

10.2 Alterations

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



Complaints Handling Procedure

October 2016

This document sets out the structure, processes and people who are responsible for delivering our customer relations complaint handling on a day to day basis. This document also provides more detail behind how Greater Anglia customer relations function handles customer contacts, shares them within the business to drive forward improvement, and is part of an overall company ethos which is driving customer service forward within Greater Anglia.

People, Process and Structure

The Contact Centre at Greater Anglia is located in Norwich, and the team report into the Customer Relations Manager.

As part of the local induction process for Customer Relations all team members are issued with the Customer Complaints Handling Procedure, and briefed on its contents as a key document which sits alongside the National Rail Conditions of Carriage and our Greater Anglia Passenger Charter.

Where documents are reviewed and refreshed over time, then new copies will be shared and circulated within the Customer Relations team.

Our Contact Centre team have access to our intranet site, and key documents contained within that site will be available for all within Greater Anglia staff to access. The Contact Centre team has its own page within the GA intranet and the Contact Centre has a designated editor responsible for ensuring all content is up to date. This particular section of the company intranet is intended to help the Contact Centre team, and all Customer Services staff.

Feedback, Mechanism and Response

Greater Anglia value all feedback. All feedback – whether a complaint, praise or general enquiry is recorded into our CRM system. This database ensures that every contact is recorded against a unique reference number. Each contact is also identified, assigned and responded to appropriately. The database can only be accessed by the Contact Centre team. Any written communication is scanned and uploaded into the unique case file created. Paper correspondence is then securely disposed of and destroyed. Delay Repay paper forms are not uploaded into our CRM system, however are used to create a unique case. Once the compensation claim has been handled the paper copy is securely retained off site for no more than four years. After that time the paper copy is securely destroyed.

Complaints about staff

Where customer complaints focus upon members of Greater Anglia staff our Customer Relations team will ensure that the appropriate manager or Line Manager is made aware of the complaint and an internal investigation process is followed by that owning manager. Where feedback can be provided to the customer we will provide information, however care will be taken to ensure that we do not compromise the responsibility under the Data Protection Act to our staff member. We will always tell the customer if we have passed their complaint on to a Line Manager to resolve internally, however the Customer Relations team will remain the point of contact for our customer.

Accident reporting

Where a customer reports an unsafe act or accident, we will ensure that an accident form has been completed, and if not we will complete one. All unsafe acts and accidents will be reported through to the responsible manager for investigation and also to our safety team to ensure correct and timely reporting.

Each week the Contact Centre team provide the Customer Service Director with an overview of the cases handled and outstanding, as well as providing a sample of five items of correspondence, to be shared with the leadership team as an indicator of customer correspondence.

Complaint handling within Greater Anglia strategy

In addition to the sample correspondence, the Contact Centre produce a 'Top Five' for the week and the rail period which indicates, using the ORR complaint categorisation as a basis, which are the top five reasons for customer complaint. All complaint handling is managed 'in-house'.

Where identified issues continue to dominate our Top Five these are conveyed to the leadership team and form the basis for our Customer Improvement Programme. The Customer Improvement Programme (CIP) meet fortnightly and is led by the Managing Director and Customer Services Director. The CIP uses cross functional working within the business to drive improvements based directly upon issues raised by our customers.

Relationship with third parties and what the customer should expect

Where complaints require us to seek help from our suppliers or a third party all correspondence is actioned through our CRM database to ensure we have a full history within the case itself. Where appropriate, and in the majority of instances the Customer Relations team in the GA Contact Centre will be the sole point of contact for our customers. Where a cause for complaint can be resolved best by a supplier we will let the customer know and ensure we keep in touch with the case until completion. An example of this may be where a customer has booked a ticket using our website, where ticket fulfilment is provided by a 3rd party. It may be better for the 3rd party to resolve with the customer, rather than GA to act as intermediary. Where this happens we have established contacts with the 3rd party to ensure that we are kept updated. We will make sure the customer is aware, and is satisfied, by contact to resolve the 3rd party.

Organisational Culture

Training and development

All new members of staff attend our corporate induction programme held at our Academy. Local induction programmes then support and feedback into the Academy.

All Customer facing and support staff (including Directors and Managers) attend a bespoke Customer Service awareness training event known as Inspire. Before attendance, and after the event the member of staff and their line manager must meet, set out the course objectives and the staff objectives. Pre and Post information is shared with the course hosts to ensure that the maximum is gained from the event. A follow up programme 'Inspire: Continuing the Journey' and 'Inspire: Customer is King' ensure that the values and behaviours are embedded.

Scenarios and team working are utilised within the programmes to embed behaviours, use peer training to ensure best practices are adopted and experiences shared. Training is cross functional, not purely delivered to Customer Service staff. Key to the Inspire training are ownership and resolution. The messages are kept alive using credit card sized aide – memoires, and by the Inspire Standards of Excellence leaflet which is provided on corporate induction and used within the ongoing appraisal process within the business for all staff – managerial and staff, front facing and back of office/support staff.

Customer Relations Quality Practice

For Customer Relations staff training strategies are embedded in all we do with informal weekly feedback and learning sessions with supervisory staff, information sharing during weekly briefs. These are followed up formally in monthly appraisals and in the annual appraisal review with the Contact Centre Management team.

We ensure quality case handling by undertaking random quality checks each week with each member of staff, and using the periodic customer survey to feedback directly not only to the business in our periodic reporting but also to the individual staff members where we look at the empathy of their response, the helpfulness of the information given, the timeliness of the response, as well as reviewing the customer satisfaction. These form the basis of our continual strive for improvement. Periodic quality checks augment the regular catch ups and are undertaken by the Contact Centre management team.

A letter writing workshop has been developed internally, and is delivered internally as a further refresher to ensuring a quality approach is undertaken.