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Dear Kevin

CONTINUOUS IMPROVEMENT IN THE RAIL OMBUDSMAN SERVICE

I firstly want to commend your team for their hard work, dedication and professional manner working with us to develop and embed the new Rail Ombudsman service under the Office of Rail and Road's sponsorship since November 2023. It has been a busy programme of work which has seen the introduction of some important upgrades to the way the Rail Ombudsman operates and serves passengers. This has included:

- Introduction of new passenger contact channels to provide for a more accessible service, such as a new WhatsApp channel and the option for video calls with case handlers.
- Improved case handling response times for certain case types to speed up the complaint resolution process for passengers.
- The appointment of a board member with lived experience of disability to the Rail Ombudsman's new independent board.
- The creation of a new Passenger Advisory Panel to advise the Rail Ombudsman board, which includes representatives from disability groups and experts with lived experience of disability.
- Ombudsman staff being trained in disability and vulnerability awareness by experts with lived experience of disability.

To build on this, ORR recently commissioned a programme of research to learn more about passengers' awareness, understanding, experience and expectations of the Rail Ombudsman. Alongside this, we hired independent experts and mystery shoppers

with lived experience of disability to test the accessibility of the service to identify any barriers to access or opportunities for improvement. This research has now concluded, and the following reports have been published:

1. **Accessibility testing of the Rail Ombudsman website and contact channels**, conducted by the Research Institute for Disabled Consumers (April 2024)
2. **Passenger awareness, understanding and perceptions of the Rail Ombudsman**, conducted by Savanta (May 2024)
3. **Rail Ombudsman User Experience Survey**, conducted by Ipsos (March 2024)
4. **The Rail Ombudsman Casework (2018-2023) Deep Dive Report**, review undertaken by the Rail Ombudsman (April 2024)
5. **Rail passengers with access needs and disabilities: experiences of complaints**, conducted by Trajectory (March 2024).

The research has generated a wealth of data that will serve to deepen and widen our understanding of passengers' experiences, views and expectations of the Rail Ombudsman. We met with your team on 21 May 2024 to discuss these findings. Together we identified a host of actionable insights derived from the various reports that you may wish to take forward and implement, subject to consultation with your members and stakeholders. These are outlined in **Annex A** of this letter.

I would be grateful if you could write back to me by **16 August 2024** with a proposed **continuous improvement plan**, which should be itemised with clear actions and timelines, showing how you have considered this new evidence and insight and explain how it will be used to make further enhancements or upgrades to the service in due course.

Yours sincerely

Scott Hamilton

Scott Hamilton

Annex A – Continuous improvement in the Rail ombudsman service



No.	Research finding	Action to consider
1	There were several findings across both the Savanta and Trajectory reports which found that general awareness and knowledge of the Rail Ombudsman was lower amongst certain demographics, such as younger people, lower socio-economic grade and ethnic minorities.	Targeted promotion of the service at groups with lower awareness and knowledge of the Rail Ombudsman.
2	The Ipsos user experience survey reported a 19% decrease in satisfaction with overall experience for in-scope complaints from 2022 to 2023. This was amongst a range of other metrics that also identified a general decline in satisfaction ratings. The Trajectory report also pointed to similar findings.	Conduct analysis to identify the causal factors affecting satisfaction ratings. Some initial areas of improvement may include: <ul style="list-style-type: none"> • Ensuring that investigations are undertaken methodically and consistently. • Creating a more standardised approach to customer responses to ensure greater consistency and quality in communications. • Ensuring that the rationale for decisions is clearly set out and explained.
3	The contract requires compliance to WCAG 2.2 AA standard. The RiDC report identified several areas across the website, portal, and CMS where the Rail Ombudsman was non-complaint. There were also numerous accessibility related suggestions for improvement noted across various reports that are worthy of consideration.	Create an action plan to resolve all WCAG issues, which may include reviewing: <ul style="list-style-type: none"> • The locations of key information and documents on the website. • Design of headings and important text. • The password reset process on the customer portal. • The accessibility of the customer application form.

No.	Research finding	Action to consider
		<ul style="list-style-type: none"> • Availability of multi-format versions of key documents i.e. not just PDF because of their potential incompatibility with screen readers. HTML would be the preferred publication format for accessibility¹
4	<p>The RiDC and Trajectory reports expressed some concerns about the language used by the Ombudsman being formal, academic, and occasionally overwhelming when corresponding with passengers. Use of simpler, plainer language could help make the service more user friendly and accessible for passengers.</p>	<p>Consider conducting a plain English language audit/review across all passenger interfaces.</p>
5	<p>There is a general observation that Rail Ombudsman publications are often written in a style that can be overly technical and legalistic.</p>	<p>Review processes for authorship and quality assurance of published documents to ensure use of plain language and readability.</p>
6	<p>The RiDC report suggested that an accessibility toolbar or software could help to overcome some of the difficulties that users with accessibility needs might face.</p>	<p>Consider adding accessibility software or an accessibility toolbar to the website/portal/CMS e.g. Recite Me was one such application mentioned.</p>
7	<p>Following on from the finalisation of the RiDC mystery shopping fieldwork and subsequent report, there remained a couple of participants that were yet to receive their requested accessible version of</p>	<p>Review process and timescales for providing accessible versions of documents to users.</p>

¹ [Why GOV.UK content should be published in HTML and not PDF – Government Digital Service \(blog.gov.uk\)](https://www.blog.gov.uk/2016/07/why-gov-uk-content-should-be-published-in-html-and-not-pdf/)

No.	Research finding	Action to consider
	documents. Following a check on 28 May 2024, the participants had still not received these documents.	
8	As part of the RiDC fieldwork, one participant tried to use the available British Sign Language (BSL) translation service. Whilst the participant was able to get through to the BSL service, there was an issue then connecting to the Rail Ombudsman to speak with a case handler.	Contact the BSL service and resolve any connection issues.
9	Ipsos and Savanta reports suggested that passengers may appreciate being advised of likely response times when they contact the Ombudsman.	Consider options for advising service users of likely response times to their contact e.g. 'expected response time is currently'.
10	The Rail Ombudsman's Deep Dive report identified numerous areas where there may be opportunities to make improvements for passengers across the rail sector. These should be followed up by the relevant parties with support from the Rail Ombudsman.	<p>The Rail Ombudsman should work with Industry, Statutory Appeals Bodies (SABs), Rail Advisory Panels and other stakeholders to look at the following areas:</p> <ul style="list-style-type: none"> • More effective signposting of passengers to the Rail Ombudsman, ensuring that all contact channels are clearly and consistently highlighted. • Improving cooperation between TOCs and third-party retailers (TPRs) in complaint handling. • Improving TOC to TOC complaint transfers. • How to improve Rail Ombudsman demand (case volumes) forecasting. • Complaints being escalated to the Rail Ombudsman that have not been fully addressed by the TOC. • How to remedy passenger confusion with advance ticket terms and conditions when a service is cancelled.

No.	Research finding	Action to consider
11	There is a general observation that more granular trend analysis of cases could be undertaken by the Rail Ombudsman.	Consider if quarterly statistical releases could offer more analysis and insight into emerging trends in case work at an industry and individual operator level.
12	A mystery shopper in the RiDC research proposed that a disabled persons' helpline number could be beneficial to some passengers with additional support needs.	Assess the potential benefits of a disabled persons' helpline number.
13	The RiDC research identified that the wording of some website links suggested to the user they would be going to one location but took them to a different or unrelated page.	Undertake a website hyperlink and navigation accuracy review.
14	In the RiDC research mystery shoppers stated they experienced some anxiety when using the online portal and webform owing to the lack of confirmation that the voluminous information they were inputting was being saved.	Ensure that any timeout/autosave message is clear on the portal.
15	There is a general observation that the Ombudsman may benefit from capturing more detailed information on passengers who use the service. This could help the Ombudsman better understand which passengers' groups may be underrepresented in the user profile and reveal possible barriers to access.	Consider options for capturing more detailed information on Rail Ombudsman users and prospective users.
16	The RiDC research highlighted that the WhatsApp number at the bottom of the home page is not the same as the one on the 'contact us' page.	Update the incorrect WhatsApp contact number on the website.

No.	Research finding	Action to consider
17	The Rail Ombudsman's Deep Dive report noted instances where a Rail Operator either disagreed with a decision or did not understand the basis for the decision. In these scenarios and in accordance with established processes the Rail Operator was given the opportunity to refer these as service complaints to the Independent Assessor. However, there is a lack of transparency around these how these cases are dealt with.	In the interests of transparency the Rail Ombudsman should consider publishing statistics or more information relating to Rail Operator service complaints, and how these cases are handled.
18	The RiDC mystery shopping fieldwork found that the textphone to textphone service did not work. Due to it not working the participant alternatively tried Relay UK, which worked well and provided a faster response than is typically experienced when using textphone.	Review current textphone arrangements and consider potential benefits of transitioning to Relay UK.
19	Two participants in the RiDC research with hearing impairments noted there was no BSL version of the Quick Start Guide. One suggested a short BSL translation video on the website.	Consider creating a BSL video recording of the Quick Start Guide for the Rail Ombudsman website.
20	A mystery shopper in the RiDC research suggested that they did not want to have to create an account to use the service and felt this could deter some passengers from proceeding with a complaint. Introducing a 'continue as guest' option may be preferable for some users.	Consider if the portal can accommodate users without the need to create an account.

No.	Research finding	Action to consider
21	<p>The Trajectory research into disabled passengers' experiences of complaints handling suggested that more could be done to raise awareness about how to make complaints. One idea suggested was targeted awareness raising via disability representative organisations such as the Royal National Institute of Blind People or Disability Rights UK or other organisations that have relevant information, signposting, and advisory functions.</p>	<p>Targeted awareness raising to promote the Rail Ombudsman service e.g. via disability organisations, charities and forums.</p>