



Report on continuous improvement in complaints handling for disabled people

A summary of train operators' actions and good practice examples

19 March 2025



Introduction

- 1.1 Disabled passengers should be able to easily access and use operators' complaints handling processes when they need to express their dissatisfaction with the standard of service they have received when travelling by rail.
- 1.2 [ORR's Complaints Code of Practice \(CoP\)](#) defines good practice principles and core minimum requirements that all operators must deliver through their Complaints Handling Procedure (CHP).
- 1.3 The CoP includes requirements that are intended to ensure an operator's complaints process is accessible for disabled people, including the need for operators to make appropriate and proportionate provision for customers who need assistance in accessing and using their complaints process.
- 1.4 Overall, the CoP has been designed to embed a culture within operators where insights from complaints are used to drive continuous improvement; and to incentivise quality and timeliness in complaints handling.
- 1.5 We monitor operators' performance to ensure that passengers are benefitting from the requirements established by the CoP. Operators report to ORR monthly on their complaint performance and provide an annual report on their continuous improvement activities.
- 1.6 Operators' annual reports, which are published on their website, must show how they have actively used and applied learning from complaints, and the complaints process, within their business. From May 2025, we are introducing a new requirement for operators to include specific consideration of the needs of disabled people as part of these annual reports. Details of the requirement is located in the [Reference guide for ORR Core Data compliance reporting](#).
- 1.7 To gain passenger insight, we monitor response data from our [Complaints Satisfaction Survey](#), which explores the experience of passengers who have raised complaints with operators. The survey includes respondents who reported that they are disabled, and whether their disability affected their ability to engage in an operator's complaints handling process.

Monitoring disabled peoples' experience of complaints handling

- 1.8 In April 2024, we published a [report on disabled passengers' experiences of complaints handling by train companies](#), which found that some disabled passengers experience accessibility difficulties with the rail complaints process.

- 1.9 To inform the report, we analysed data from our Complaints Satisfaction Survey and identified five operators whose disabled customers reported the most barriers to accessing and engaging with the complaints process. The operators were Avanti West Coast, Govia Thameslink Railway, Northern Trains, ScotRail and Transpennine Express.
- 1.10 Consequently, we asked those five operators to use the survey data, alongside other sources of evidence, to inform a review of the experiences of disabled passengers when using and accessing their complaint processes. We required them to report the key issues, and actions they are taking to address them, via an interim continuous improvement report.
- 1.11 In response, the operators conducted their reviews using data taken from internal surveys, stakeholder engagement and sessions held with their accessibility and contact centre teams. They submitted a report setting out a range of improvements they are implementing in response to their review.
- 1.12 We have set out below a selection of these initiatives that are in progress and will be used by the five operators to improve access, and more broadly to improve the experiences of disabled people as part of their complaints handling process. The initiatives provide a general overview and should not be interpreted as applying uniformly to all five operators.
- 1.13 We welcome these initiatives which we consider could be implemented more widely across other operators.

Steps being taken to improve access to the complaints handling process

- 1.14 Below is a summary which reflects the range of steps being taken by the five operators to improve the ways disabled people can access and use their complaints handling process:
- Identifying complainants who book assistance via Passenger Assist, to ask about adjustments they might need as part of their engagement with the complaint process.
 - Reviewing the accessibility and functionality of all customer webforms and responding to user feedback to make improvements.

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- Adding an option in a webform for customers to indicate whether they require additional support during the complaint process.
- Providing more tailored and individualised responses to complaints on accessibility issues, with the removal of templates to provide a personal response.
- Providing a dedicated team to manage accessibility complaints and complaints from disabled people.
- Implementing steps to reduce the length of time to respond to a complex complaint, including manager led sessions with frontline staff to facilitate prompt investigation, ensuring key contact details are up to date to avoid any delays to communication, and introducing service level agreements with station teams to respond to requests for information.
- Adding questions to their own internal surveys to gain further insight about any challenges faced with accessing and engaging with the service used by the customer.

Steps being taken to better understand the experiences of disabled people as part of complaints handling

1.15 Below is a summary which reflects the range of steps being taken by the five operators to better understand the experiences of disabled people as part of their complaints handling:

- Improving the identification of complaint themes on accessibility issues to inform more effective reporting.
- Revising their current approach to providing redress when assistance fails, including proactively reaching out to passengers to offer redress, ensuring the level of compensation awarded is comparable to the experience of the passenger, and increasing awareness of redress provision at the point of a passenger booking their assistance.
- Communicating lessons learned in safety briefings to staff regarding complaints on accessibility issues.

- Strengthening collaboration between accessibility and contact centre teams, including regular meetings with area leads, and feedback provided to complaint handling staff.

Next steps

- 1.16 We recognise the steps being taken by operators Avanti West Coast, Govia Thameslink Railway, Northern Trains, ScotRail and Transpennine Express as a positive move towards improving the experiences of disabled people as part of operators' complaints handling process.
- 1.17 To ensure we can monitor progress on the actions and to understand their effectiveness, we have asked each of the five operators to provide an update against their actions in their annual complaint continuous improvement report, due in May 2025. Where possible, a description of the impact of each action must be included, to understand whether improvement has been made.
- 1.18 To ensure that operators maintain their focus on delivering continuous improvements in their complaints handling processes, all operators are now required to include specific consideration of the needs of disabled people in their annual complaint continuous improvement report.
- 1.19 The CoP requires all operators to make appropriate and proportionate provision for customers who need assistance in accessing and using their complaints process. Therefore, we strongly advise all operators to review their current processes, identify the gaps, and assess how they can implement the range of good practice set out in this report, to improve disabled passengers 'overall experience.



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