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29 September 2016

Dave Penney  
Managing Director  
Chiltern Railways

Dear Dave

**Approval of The Chiltern Railway Company Limited (Trading as Chiltern Railways) Complaints Handling Procedure (Condition 6 of the 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 the following, which we believe is likely to be positive for passengers:

- Your commitment to respond to 90% of complaints within 10 working days; and
- Your commitment to publish the telephone number for your Customer Relations Department in local telephone directories.

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.

You have informed us that you will be making substantial changes to your website in December 2016. In the meantime you have made changes to the 'Contact Us' page of your website to ensure that passengers have a clear route to complain and that your complaints handling service standards are easily accessible. Please keep us up to date with the progress of your new website and provide an update, no later than three months after the date of this letter, detailing the changes you will be making and, where possible, containing mock-ups of your new site

In the case of Chiltern Railways 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. These protocols have now been finalised and we expect licence holders to abide by them in their handling of appeals.

Yours sincerely,



**Annette Egginton**



# Complaints Handling Procedure

**Chiltern Railways**

Date of Issue: October 2016

[chilternrailways.co.uk](http://chilternrailways.co.uk)

**Chiltern Railways**

*If you think our way, travel our way.*

# Chiltern Railways Complaints Handling Procedure Section 1 – 3.2

## 1. Introduction

The purpose of these guidelines is to define the process for handling customer comments/ complaints related to Chiltern Railways Ltd and the agreed standards relating to cases where compensation is claimed.

## 2. Principles and objectives

The overriding principle is that all complaints will be answered, fully investigated and used to drive improvement, where required.

The definition of “complaint” for the purpose of these guidelines is:

“Any expression of dissatisfaction by a customer or potential customer about service delivery or company or industry policy.”

Source: Office of Rail and Road (ORR) Guidance on Complaints Handling Procedure.

The objective of these guidelines is to ensure that the customer receives a prompt and reasonable response and where appropriate compensation which is fair and reasonable to all parties involved.

This document also recognises the importance of complaints as a valuable source of information and gives us the opportunity to identify areas of improvement, formulate appropriate courses of corrective action and arrange implementation and monitoring.

## 3. Contacting Chiltern Railways

3.1 Customers can contact Customer Services via the routes detailed below:

Method of contact	Details
Online	<a href="http://www.chilternrailways.co.uk/contact-us">www.chilternrailways.co.uk/contact-us</a>
Email	<a href="mailto:Customer.service@chilternrailways.co.uk">Customer.service@chilternrailways.co.uk</a>
Post	Customer Relations, Chiltern Railways, Banbury ICC, Merton Street, Banbury, OX16 4RN
Telephone	03456 0051 65 (Number accessible from mobiles at no additional cost) Customer Relations opening hours 08.30 – 17.30 Monday – Friday (Answer machine available outside of these hours)
Social Media	Twitter - @chilternrailway Facebook – Chiltern Railways
Via a member of staff	Any Chiltern Railways employee will be able to assist should you need to complain or pass on comments. They will be able to use their discretion to solve the issue or direct you to Customer Relations for further assistance.

# Chiltern Railways Complaints Handling Procedure

All complaints should be addressed to Chiltern Railways Customer Relations and should include the following:

- Name, address, and contact telephone number
- Details of complaint including date, time and location if appropriate.
- Details of Journey if appropriate
- Copies of train tickets if appropriate

3.2 All contact made via our Social Media Channels will be responded to and will be taken off line and passed onto the Customer Relations team to investigate and provide a full response to the customer. Social Media is not a platform for customer complaints.

3.3 Chiltern Railways will ensure that information concerning how to make a complaint is displayed as follows:

- Available in all major publications such as in timetable booklets and in the Passenger's Charter, which is provided on the Chiltern Railways website and can be obtained from any staffed station
- The telephone number for the Customer Relations Department will be published in local telephone directories
- Notices posted in each carriage of every train
- Notices posted prominently at every station

3.4 All material publicising the Complaints Handling Procedure will display the address and telephone number of the relevant organisation that customers can refer complaints to should they not be happy with our final response. For stations between London Marylebone and Bicester North/Aylesbury Vale Parkway this will be London TravelWatch. For stations between Kings Sutton and Kidderminster, stations north of Oxford, and Oxford Parkway, Bicester Village and Islip this will be Transport Focus.

3.5 Please note that in addition to this, the Alternative Dispute Resolution (ADR) for consumer disputes (Competent Authorities and information) regulations 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](http://www.consumer-ombudsman.org)). However, as Transport Focus/London Travelwatch 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/London Travelwatch.

3.6 Customers will be able to obtain comment forms from on-train staff and at each staffed station. Customers will also be able to submit written comments via our website.

3.7 At unstaffed stations a notice will be displayed stating where comment forms may be obtained i.e. the nearest staffed station as well as displaying our web address where comments can be made directly.

3.8 At multi-operator stations, posters will advise customers of how to contact each train company if they have a complaint specific to that particular company. Comment forms for individual train companies will also be available upon request.



# Chiltern Railways Complaints Handling Procedure

3.9 Chiltern Railways will provide a clear statement regarding procedures in relation to the handling of customer complaints within its Passenger's Charter, which is available to all customers upon request at staffed stations, or via the Customer Relations Department. The Passenger's Charter is also available on our website [www.chilternrailways.co.uk/about-us/passenger-charter](http://www.chilternrailways.co.uk/about-us/passenger-charter).

3.10 Chiltern Railways will provide whatever assistance may be reasonably required to enable all customers to utilise this Complaints Handling Procedure and will ensure that carers, support workers and guardians are able to act on behalf of a passenger with the passengers prior permission.

3.11 A copy of this Complaints Handling Procedure will be available at all staffed stations and Customer Relations Department. A copy will also be available on our website.

3.12 All customer facing staff will be briefed on the contents of this Complaints Handling Procedure.

3.13 We can also supply customers with literature in a range of different formats on request, including large print and make provision to translate correspondence received in different languages. <https://www.chilternrailways.co.uk/disabled-traveller-information>

## 4. Complaints Handling Service Standards

### Customer focused

- We will put you at the heart of the complaints handling process

### Accessible

- We will communicate with you in a clear manner at all times

### Simple and timely

- We will make it as easy as possible for you to contact us, and be up front and honest with you about our timescales for dealing with your correspondence

### Fair

- We will be objective and impartial at all times, using evidence and basing our response on the facts and established circumstances rather than assumptions.

### Deliver improvements

- We will strive to improve our complaints handling service, using analysis of outcomes to support service delivery and drive service quality improvements

# Chiltern Railways Complaints Handling Procedure

## 5. Response timescales

5.1 Chiltern Railways will adhere to the following timescales for providing a response to each customer's comments/complaint:

Written	90% responded to within 10 working days. 95% responded to within 20 working days.
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Fax	90% responded to within 10 working days. 95% responded to within 20 working days.
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Telephone	Where possible immediate resolution. 90% responded to within 10 working days. 95% responded to within 20 working days.
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N.B the reference to working days stipulated above means Monday-Friday excluding public holidays.

5.2 Chiltern Railways will endeavour to meet the response timescales detailed in 5.1 at all times, except where Chiltern Railways receives a sudden and unexpected large increase in the volume of complaints. Circumstances where this may apply include; exceptionally severe weather conditions, riots or civil commotion, line closures, and line blockages. In such cases Chiltern will ensure that the ORR, Transport Focus and London Travel Watch are made aware, and will continue to use all reasonable endeavours to achieve the timescales set out in 5.1.

5.3 In cases where complaints cannot be answered fully either within the agreed timescale or as a result of situations as described in 5.2, Chiltern Railways will advise customers via the bounce back emails, our contact us page, holding letters will be sent and we will provide progress updates to complainants every 10 working days after the target response time has elapsed.

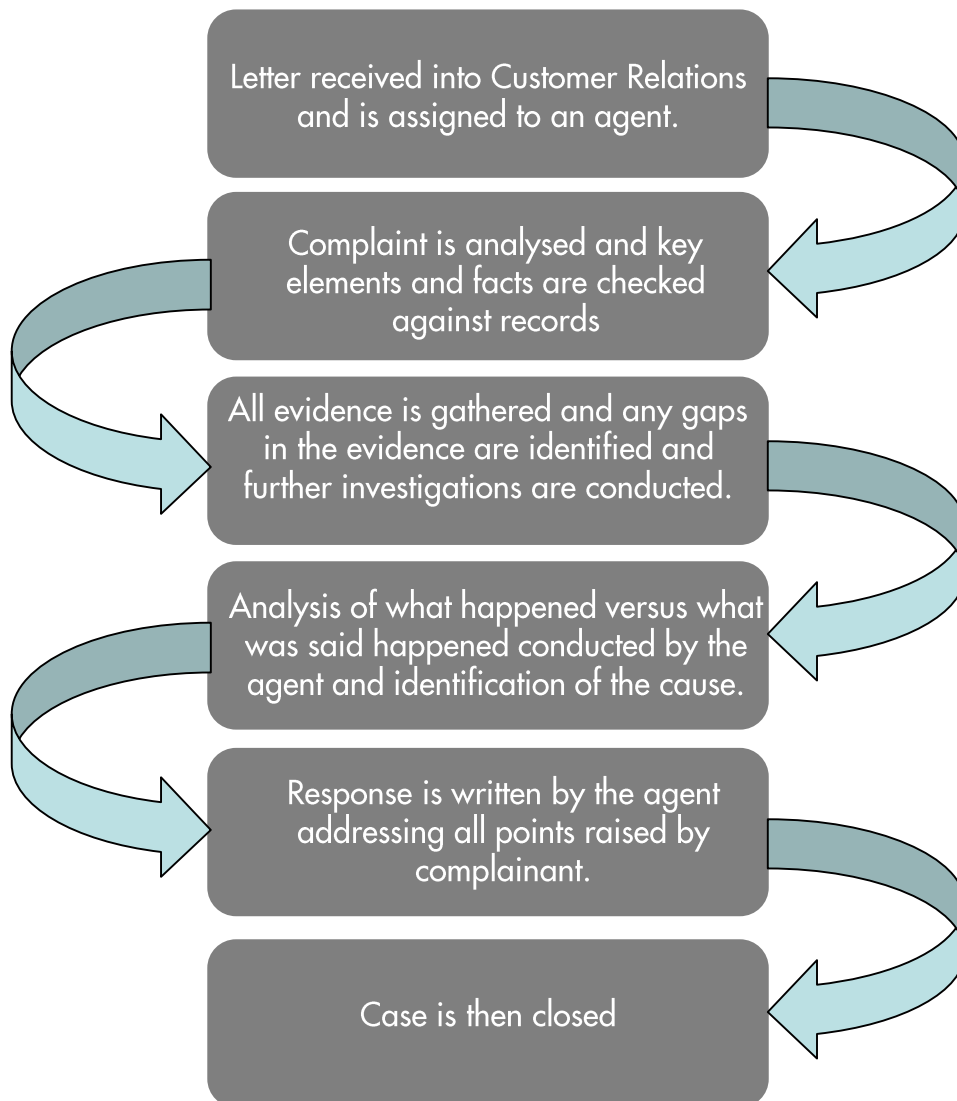
5.4 All responses are delivered in a tone that encompasses the Chiltern Values, which are *With Care, With Creativity, and With Each Other*. Responses will not include railway industry jargon, initials or acronyms.

5.5 In cases where Chiltern Railways receives a customer complaint, which is not related to either its services or facilities, the complaint will be logged onto our contact management system and a copy retained. The original correspondence will be forwarded to the relevant train company. Chiltern Railways will advise the customer in writing of the action taken and will provide them with details of the address and contact number that their complaint has been forwarded to.

# Chiltern Railways Complaints Handling Procedure

5.6 In cases where a customer complaint is received involving both Chiltern Railways and other parties, Chiltern Railways will deal with the part of the complaint that is relevant to their service(s) as per Section 5 of this document. In respect of complaints concerning other parties, Chiltern Railways will make reasonable endeavour to address the issues with the co-operation of the other parties in a co-ordinated response where practical. Where a more detailed response is required the correspondence will be sent to the other relevant parties within reasonable timescales. Chiltern Railways will advise the customer that this has been done and give the correct address and contact number to which the letter has been sent in their response.

5.7 Chiltern Railways will always ensure that a full and fair investigation is undertaken for all complaints with the aim of ensuring that a satisfactory response is provided. Our investigation process is as below:





# Chiltern Railways Complaints Handling Procedure Section

## 6. Compensation

6.1 If you are delayed on a journey provided by Chiltern Railways and the cause of the delay was within railway industry control you can claim compensation. You must make a claim within 28 days of the date of travel. This does not affect any legal rights or remedies you would otherwise have under Consumer Rights Act. We will always inform you of the compensation due for a delay when contact is made with us.

6.2 Our Compensation Policy is below:

Length of Delay	How?	Method
One hour or more	100% compensation for the leg of the journey affected	In the form the purchase was made, unless you expressly agree otherwise
30 minutes or more but less than an hour	50% compensation for the leg of the journey affected	In the form the purchase was made, unless you expressly agree otherwise



For Season Ticket Holders the amount refunded will be calculated on the cost of an Anytime Fare for the journey you were making.

6.3 The levels of compensation described in this Complaints Handling Procedure set out our general policy regarding compensation but do not in any way limit or exclude your legal rights as a consumer under the Consumer Rights Act 2015 or otherwise.

## 7. Dissatisfied Customer

If a customer is dissatisfied with the result of their complaint, it will be dealt with as per the process shown overleaf.

# Chiltern Railways Complaints Handling Procedure Section

## 7. Dissatisfied Customer

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### 7. Escalation process

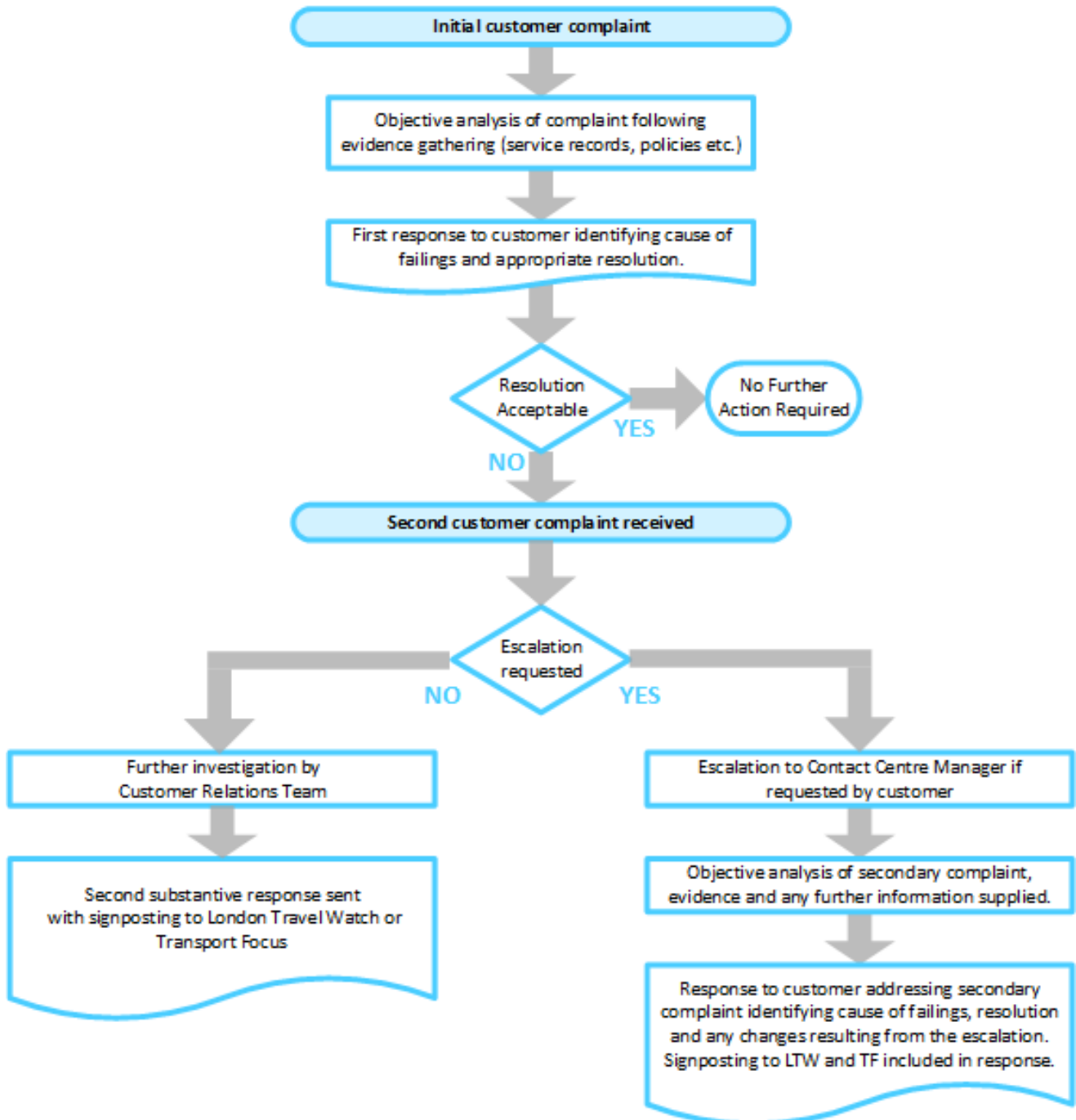
7.1 A complaint will be escalated to the Contact Centre Manager if the complainant requests this in their follow-up to our original response. If no request is made, the member of the Customer Relations Department who handled the original complaint will compose any follow up response. Any secondary response made by Chiltern Railways may however remain unchanged from the initial response, unless further information is discovered which change the circumstances under which the original decision was made.

7.2 Where a customer is not satisfied with the response given by Chiltern Railways they will be given, either verbally or in writing, the details of Transport Focus or London TravelWatch who will review your complaint and can make representation to us on your behalf.

7.3 Chiltern Railways meets frequently with Transport Focus to discuss any appeals. Any correspondence received from Transport Focus and London TravelWatch is acknowledged within three days, and any requests for case correspondence within five days. We aim to respond to all appeal submissions within 10 days.

# Chiltern Railways Complaints Handling Procedure

## Complaint escalation process



# Chiltern Railways Complaints Handling Procedure

## 8. Contact Details for London Travel Watch and Transport Focus

London TravelWatch

169 Union Street

London

SE1 0LL

Tel: 020 3176 2999

Email: [enquiries@londontravelwatch.org.uk](mailto:enquiries@londontravelwatch.org.uk)

Transport Focus (Freepost address)R

RTEH-XAGE-BYKZ

Transport Focus

PO Box 5594

Southend on Sea

SS1 9PZ.

Tel: 0300 123 2350

## 9. Termination of correspondence

9.1 We believe that all correspondents and complainants have the right to be heard, understood and respected. We also believe that our staff have the same rights.

9.2 We aim in all our dealings to:

- Make it clear to everyone we deal with, both on initial contact and throughout our engagement, what Chiltern Railways can and cannot do to meet their concerns and expectations
- Be open and not raise expectations that we cannot meet
- Deal fairly, honestly, consistently and appropriately with all correspondents and complainants, even those whose behaviour or actions we consider unacceptable
- Provide a service that is accessible to all
- Ensure that other people who use the services of Chiltern Railways and our staff do not suffer disadvantage as a result of the unacceptable behaviour of others.

9.3 Occasionally, the behaviours or actions of individuals that we have dealings with make it impossible for us to continue any constructive engagement. In this small number of cases we have to consider taking steps to protect our staff or to ensure that our ability to work effectively is not undermined. Our Vexatious Correspondence Procedure describes the circumstances under which we will consider terminating communication with a complainant. This document is located on our website at [www.chilternrailways.co.uk](http://www.chilternrailways.co.uk)

# Chiltern Railways Complaints Handling Procedure

## 10. Monitoring, auditing and review

10.1 Chiltern Railways will provide the following internal communications to monitor performance in relation to volumes of complaints, resolution and necessary action:

- A monthly report submitted to the Customer Services Director detailing all of the above for the preceding period
- Periodic report submitted to the Department for Transport, ORR, Transport Focus and London TravelWatch regarding levels of complaint, types and speed of response

10.2 All items of written correspondence received by the Customer Relations Department are logged onto the contact management system, along with copies of all correspondence sent to the complainant.

10.3 All telephone complaints are logged onto the contact management system and where necessary a written response is formulated. Any such written responses are also logged on to the contact management system.

## 11. Insurance claim policy and procedures

11.1 In the first instance all claims will be directed to the Customer Relations Department.

11.2 Claims in excess of £500 will be passed to the Health, Safety, Quality and Environment Department for onward transmission to our Insurance Company.

11.3 Claims under £500 will be dealt with by the Customer Relations Department, in accordance with the agreed internal policy.

11.4 All claims relating to personal injury will be passed to the Health, Safety, Quality and Environment Department for resolution.

11.5 As per Condition 42 of the National Conditions of Travel (available from [www.nationalrail.co.uk/static/documents/content/NRCOC.pdf](http://www.nationalrail.co.uk/static/documents/content/NRCOC.pdf)), we do not accept liability for any loss (including consequential loss) caused by the delay and/or cancellation of any train. However, we will consider additional claims in exceptional circumstances.



# Complaints Handling Procedure – Process Document

**Chiltern Railways**

Date of Issue: July 2016

[chilternrailways.co.uk](http://chilternrailways.co.uk)

**Chiltern Railways**

*If you think our way, travel our way.*

# Customer Relations - Training at Chiltern Railways

**Our people are trained so that they feel comfortable in dealing with the variety of enquires that they receive.**

**All of our staff are trained in the following areas:**

- 1. To delight our customers and aim to meet and exceed expectations where appropriate.**
- 2. To indentify what is a "Complaint" based on the guidelines issued by the ORR.**
- 3. To investigate all complaints and provide necessary feedback to the relevant department or managers to ensure we continue to improve.**
- 4. To respond to customers with the aim of a first time resolution at all times.**
- 5. To signpost to the Ombudsman or escalate internally should the customer be unhappy with the first response received.**

**Our Staff deal with complaints that come through all channels, these include; post, web form, email and telephone. Since July 2016 Social Media has also sat within the Customer Relations department and we have a dedicated team who are trained in dealing with customer comments that come via this channel.**

**All our Customers are informed of the timescales for response via an automated response that is generated when there correspondence is logged onto the system.**

**Staff will always respond to the customer offering an apology and an explanation as to what their in investigation has shown. When necessary this will be conducted over the telephone to ensure that all points the customer has are covered and no areas are missed.**

## **Learning from our Customer Comments**

**Our customers comments are very important to us and assist us in our journey from good to great and therefore we always try to use their comments to help drive improvements across all areas of the business.**

**This is implemented via the Contact Centre Manager attending various meetings within different departments to look at where improvements can be made to enhance the Customer experience and improve Customer Satisfaction.**

# Customer Relations - Training at Chiltern Railways

Training is conducted by the Contact Centre Manager and also members of the Customer Relations Team. Where necessary and appropriate HR Learning & Development, and external training providers are utilised

The training process for new starters is as follows:

New starters are met by HR and Contact Centre Manager on their first day and given a full 2 week schedule for their first two weeks. The schedule includes station visits with the relevant managers, visits to our control centre, time with the performance team and train planning department, company induction and a weekly catch up with the Contact centre Manager to review progress,



On completion of the initial 2 weeks all Customer Relations specific training is completed in a live environment and the new starter is paired up with an agent for a period of 2 – 3 weeks (time dependent on progress). Written correspondence is trained initially with telephone correspondence following.



On completion of the further 2 – 3 weeks the agent is then put into a live position responding to customers however during this time the Contact Centre Manager quality checks a selection of their work for a period of time. During the first 4 weeks a weekly catch up is diarised with the contact Centre Manager to review progress.

# Customer Relations – From the customers perspective

**When a customer corresponds with us they receive the below notifications:**

Method of contact	What the customer sees:
Online	An auto generated notification detailing our target response time of 10 days
Email	An auto generated notification detailing our target response time of 10 days
Post	There is no auto generated post for correspondence received via this channel
Telephone	Verbal acknowledgement of the timescales for response

**The auto response that the customer receives will detail the “Ticket Id number” which is unique to their case and is used to link all correspondence between the Customer and Chiltern Railways.**

**We always try to respond to any written correspondence by email (where provided) as this is a quicker and easier option for both parties and should provide a quicker resolution.**

**Where a complaint requires a detailed investigation that may exceed the 10 day period, we would contact the customer and keep them involved with any progress that we are making.**

**If we are experiencing increased volumes of correspondence meaning that we are unable to respond within the target of 20 working days we will inform the ORR, LTW and TF to advise them of our position and the steps we are taking to rectify. We would also amend the auto generated notification to advise of the position.**

# Customer Relations – Managing the performance of Customer Relations

Managing the performance of our Customer Relations Team is key to delivering excellence and delighting our customers.

We manage this as follows:

## 1. Customer Satisfaction

Four days after a case is solved in Customer Relations an email is sent directly to the customer asking “How was your recent experience with Chiltern Customer Relations?” and allows the customer to simply answer Good or Bad. These responses are then filtered back in to the system and logged as an overall and also against each individual agent and can be used to look at areas of excellence and also areas requiring improvement.

## 2. Template responses

When a large incident occurs we create a template for that incident which gives clear details about what occurred and how Chiltern are dealing with it, this is then put into the system for all agents to use to ensure we are providing consistent responses to our customers.

## 3. Quality assessments

We hold email and call monitoring sessions with our supplier, Journey Call to ensure that the scoring matrix that they use suits our needs and that the level of response being received meets our expectations.

## 4. Social Media

Social Media has recently moved so that it now sits within the Customer Relations Department meaning that there is better coverage throughout the day and response times are faster ensuring a more timely resolution is found.

## 5. Reporting

Daily - Management reports are sent out on a daily basis to the Contact Centre Manager, Head of Customer Service and Customer Service Director detailing a high level overview of the days events.

Periodically – Management reports are sent out periodically to the wider business detailing an overview of correspondence levels and a narrative to show how the Customer Relations Team are performing and the factors that have impacted them during the period.

## 6. Bi Weekly Account Meeting

Bi Weekly conference calls are held between Chiltern Railways and Journey Call to any areas of concern are highlighted and addressed and to also share any best practice.



# Customer Relations – DPA

**Customer Relations hold customer records for a period of 5 years and after this time all records are disposed of securely.**

**2016 saw the completion of a major Customer Relations & IT project to replace a legacy Customer Support System. Since March 2016 all Customer Records are held electronically with any postal correspondence being scanned into the system and logged to create a unique Ticket ID. As a result of this implementation our paper based processes are now more effective and environmentally focused as the hard copies are destroyed after entry into the electronic system.**

**Paper records prior to March 2016 are held securely and will be destroyed in yearly batches over the 5 years to 2021.**

**Management information is delivered daily to Customer Services Director and Head of Customer Service Quality and on a periodic basis to the rest of the business.**