

Annette Egginton

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

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27 September 2016

Christian Roth
Managing Director
South West Trains

Dear Christian

Approval of Stagecoach South Western Trains Limited (trading as South West Trains) 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 your commitment to consult with London TravelWatch and Transport Focus before taking the decision to terminate correspondence, 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.

In the case of South West 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 now been finalised and we expect licence holders to abide by them in their handling of appeals.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Annette Egginton'.

Annette Egginton



Customer Complaints Handling Procedure

To Review: September 2018



Contents

	Page
Introduction	2
How to Complain	3
Data Protection	4
If your complaint is not with South West Trains	4
Response Times	4
Accessibility and Reach	4
Emergency Planning	5
Putting Things Right – Acting Fairly	5
Training Programmes	5
Processes and Protocols	6
Governance, Policy and Leadership	6
London Travelwatch and Transport Focus	6

Introduction

South West Trains (SWT) defines a complaint as 'any expression of dissatisfaction by a customer or potential customer about service delivery or company or industry policy'.

We recognise that customers will contact us for the purpose of complaining, as defined above, but also to provide feedback. As such we will ensure that we utilise a wealth of channels to capture these comments. We also understand the value of resolving difficult situations our customers may face, therefore we will empower our front line teams to resolve these issues where appropriate.

We work with third party suppliers which form an integral aspect of our service delivery in some areas. Complaints concerning matters related to our suppliers will be owned and handled by SWT (with the exception of when a customer wishes to complain direct to the supplier).

We will consult with both London TravelWatch and Transport Focus (details of whom can be found on Page 6) before making any formal changes to this procedure. Customers who remain unhappy with the outcome of their complaint to SWT can contact London TravelWatch or Transport Focus, which may be able to pursue the complaint on a customer's behalf.

South West Trains are ultimately committed to answering every customer complaint promptly and fairly to lead to continuous improvement to the customer experience.

A message from the Head of Customer Experience:

'At South West Trains, we are committed to continually improving the Customer Experience. Whether that is onboard the train, at the station, or via digital media, we are working hard to ensure the service you expect is the service you receive. Our hope is that this document on how to comment on the service you receive is clear and informative, enabling you to understand what to do, should the service you have received not been to the standard we work to constantly deliver.'

If you have any questions about our Complaints Handling Procedure, please do not hesitate to contact our Customer Service Centre, on 0345 6000 650, or via any of the channels listed in this procedure. Thank you.

How to Complain

Details on how and to whom a customer can complain will be available in all major publications (i.e. timetables, customer updates), be prominently displayed at stations, on the SWT website and through social media. Where we have stations, at which other train operators call, we will make clear the different contact points for complaints about different services.

We ensure that any of our publicity material contains details of where a complainant can go, should they not be satisfied with our response. For example, to passenger watchdogs London Travelwatch or Transport Focus.

We want to encourage feedback from our customers or potential customers and that is why we are committed to ensuring we offer a variety of channels for our customers to get in touch:

A – In Person

All SWT staff can handle customer complaints; this may involve coming to an 'on the spot' solution, or signposting a customer to the relevant channel such as our dedicated in-house Customer Service Centre. We also offer all of our frontline customer service teams training in customer service. We look to encourage and empower our staff to resolve complaints 'on the spot' where appropriate. If a frontline member of staff directs a customer to our dedicated Customer Service Centre, it is not necessary for them to inform a SWT manager or another member of railway staff. Complaint forms are also available from any SWT Stations – please ask a member of staff. You can then fill in this form at the station or in your own time, before sending it to the Customer Service Centre to be handled.

B – Via our website southwesttrains.co.uk

Customers will be able to access our feedback and complaints webpage within 2 clicks of the homepage. The webpage will detail how to get in touch with our customer service teams via various channels and how to complain. We will actively review and update our website FAQs to allow our customers to find the information they need.

C – Via Facebook and Twitter

We will use social media channels to push out key messages to our customer base, including how to complain. Additionally, we have a customer-facing social media policy outlining our approach to our social media channels. Our strategy details our commitment to engage with customers through a variety of social media channels, and respond where appropriate. When a customer alludes to wishing to make a complaint, we will direct them to our dedicated Customer Service Centre via our website or through email.

D – Via our Customer Relations team

Our dedicated in-house Customer Service Centre will be open 7 days per week, 363 days per year, during the hours of 06:00 through to 22:00. We can be reached by calling **0345 6000 650**. After 22:00, telephone calls are redirected to National Rail Enquires who can help with the majority of customer queries. 03 numbers can be accessed from mobiles in addition to landlines without incurring premium rate.

If a customer complains, we ask for the following information so we can help resolve your complaint the best we can:

- a detailed description of the series of events leading the customer to complain
- any dates, times or locations surrounding the complaint
- any tickets that were used for the journey
- and any additional information the customer feels may be relevant.

This will help us research the complaint and be able to provide the customer with a full and comprehensive answer. When a complaint is made over the phone, details are recorded accurately, consistently and in full, so the details of the complaint can be shared with passenger bodies should an appeal be raised.

Details of compensation information can be found within our Passenger's Charter at southwesttrains.co.uk/charter. Dependant on the nature of your complaint, we may offer the customer a one off gesture of goodwill as compensation where appropriate.

If a customer contacts us to complain about a disrupted journey but does not specifically request compensation then we will highlight their compensation rights to them and pay any compensation they may be owed.

Data Protection

The secure protection of our customers' data is a key priority for our teams and SWT will comply with the Data Protection Act 1998 (DPA) at all times.

SWT understands there may be occasions where third parties wish to conduct research with complainants to learn about their experiences. SWT fully comply with data protection laws and complainants are advised via the Terms and Conditions they agree to when submitting a complaint that their information may be used. There may also be times where we share customer details with the ORR, Transport Focus and London Travelwatch. All data is held securely in accordance with law, and complainants have the right to access their data, and should enquire through our dedicated Customer Service Centre. South West Trains keeps accurate and up to date records of all complaints we receive in line with Data Protection Policies and data requirements provided to us from our regulator.

The rail industry has an arrangement called the Claims Allocation and Handling Agreement (CAHA). Under this agreement, compensation should be dealt with by the companies for their own customers. If some or all responsibility is allocated to another party, the insurance companies balance the payments behind the scenes. Claims will be dealt with in accordance with this agreement. Please note the Claims Allocation and Handling Agreement (CAHA) does not form part of this procedure.

If your complaint is not with South West Trains

SWT is devoted to delivering a high quality service to our customers and potential customers who may get in touch. If our Customer Service Centre becomes aware that the correspondence relates primarily to another train operator or service provider, we will answer the customer as fully as possible, co-ordinating responses with the relevant organisation where practical. We will then transfer the correspondence on to the relevant organisation on behalf of the customer and will inform the customer of this, along with the organisations' respective contact details.

Response Times

SWT will acknowledge all customer contacts received by our Customer Service Centre. We will aspire to not only meet the industry standard, of providing a full response to 95% of complaints within 20 working days, but to exceed by working towards challenging internal targets and thus providing a truly timely response to our customers. Full details of our complaint response times and commitments to our customers can be found in our Passenger's Charter at southwesttrains.co.uk/charter

Sometimes it may be necessary for a complaint to be escalated throughout our management chain, this can be at the request of a customer or through a member of staff's initiative. In this instance, a complaint will be sent to a more senior manager for their reference and action, who will then feedback to the customer usually via a member of staff in our Customer Service Centre. Throughout this process, the Customer Service Centre Management team are kept informed and can track the complaint through this channel, should the customer require an update on the status of their complaint.

Accessibility and Reach

We consider accessibility and reach to be the means available to customers to provide feedback and the ease of doing so, taking into account the needs of all customers including those with different types of disabilities. There are many alternative formats to complain, detailed in the 'How to Complain' section that suit a variety of customer needs. In addition, frontline staff attend training on awareness about our disabled customers, and are committed to helping customers whatever their needs may be. In addition, carers, support workers and guardians are able to advocate on behalf of a passenger with the passenger's permission and authority. If a customer has a question about how to complain, they can ask at a station or via our dedicated Customer Service Centre who will do our best to help.

South West Trains are dedicated to publishing our material in plain English without the use of railway jargon. We want to be as clear as possible to all of our customers to ensure accessibility and understanding.

Our overall aim is to provide an inclusive railway, which is available to as many people as possible through positive moves to increase accessibility. Our Disabled People's Protection Policy (DPPP) comprise two documents:

- 'Making Rail Accessible: Guide to policies and practices' southwesttrains.co.uk/globalassets/pdfs/disabled-persons-protection-policy.pdf sets out how we will protect the interests of older and disabled passengers who use our trains and stations.
- The other document is a passenger leaflet, 'Making Rail Accessible: Helping older and disabled passengers' southwesttrains.co.uk/globalassets/pdfs/makingrailaccessible15.1.13web.pdf. It provides an overview of the service we can offer to disabled and older customers when they travel with us and the assistance they can request to help them in planning and making their journey.

Emergency Planning

In the event of an emergency or if we experience disruption, we are committed to still providing an excellent service and have contingency plans in place. When we experience a large increase in the volume of our complaints, a specialist team of agents are deployed to help tackle these complaints. If we feel that our volume of complaints may affect our response time commitments, we will be sure to inform the ORR, London Travelwatch and Transport Focus. We work closely with agency staff who can provide us with staff within 24 hours' notice, who can help us take calls from customers and respond to written correspondence.

Putting Things Right – Acting Fairly

We are committed to conducting a fair and thorough investigation to all customer contacts. We try to provide as much detail as we can to the customer in compliance with data protection, to come to a mutually agreed outcome and solution for the customer.

We are committed to getting a positive resolution for our customers. We will continually work to ensure that we make it right for the customer. In line with industry and European guidance we will signpost passengers to the relevant industry watchdog, such as London TravelWatch

or Transport Focus, and inform of the current Alternative Dispute Resolution arrangements no later than our second substantive response to the customer. This may well be in spite of the fact we are still in dialogue with the customer.

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. However, as Transport Focus 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.

SWT will ensure that all outstanding concerns are addressed when corresponding with a customer at the point of resolution.

We reserve the right to terminate correspondence with a customer, if a senior manager deems this customer to be frivolous, vexatious or abusive, or we feel we have exhausted all possible channels. We will be sure to consult with London Travelwatch and Transport Focus when making this decision, and will inform the customer of full and detailed reasons for terminating contact. In addition, we will also signpost the customer to passenger bodies when this decision is taken.

Training Programmes

At South West Trains, we are committed to ensuring our staff are trained to the highest standards and possess the skills and resources they need to perform their roles effectively.

All the staff in our Customer Service Centre undergo 'Quality Monitoring' which ensures the high standards we expect from our employees are constantly maintained and delivered.

South West Trains is also committed to empower our frontline teams, to resolve queries on the spot if they are able to. Staff are briefed in dealing with customers through internal communications and their line managers in order to effectively deal with customer queries and feedback. In addition to this, our frontline staff also undergo extensive customer service training to deliver an excellent customer service.

Processes and Protocols

In order to constantly improve our complaints handling procedure, we undertake quality monitoring of a selection of phone calls and written correspondence from members of staff. We then assess these against a quality framework in order to learn and develop our staff to ultimately improve the customer experience.

When complaints are made against a specific member of staff, an internal fact finding investigation will take place which includes the use of CCTV where it is available. This investigation is aligned to our Human Resources policies and procedures to protect both our customers and our staff. We are not able to inform our customers of any specific action that has been taken as a result of that investigation due to data protection and issues of staff confidentiality. Our Privacy Policy can be found at southwesttrains.co.uk/terms--conditions/.

When a customer has been injured at one of our stations or on one of our trains, a thorough safety led investigation will complement the complaint. This is handled by safety and claim specialists throughout, often with advice from our legal team.



London Travelwatch and Transport Focus

London Travelwatch, 169 Union Street,
London, SE1 0LL

T: 0203 1762 999

E: enquiries@londontravelwatch.org.uk

londontravelwatch.org.uk

Governance, Policy and Leadership

Our Managing Director looks after an executive team of Directors who are responsible for different areas of the company. Complaints sits under the Customer Service directorate, under the Customer Service Director. Customer Service is divided into a number of functions including Stations, On-Train and Retailing. Customer Experience is one of these functions which is looked after by the Head of Customer Experience. The Contact Centres Manager sits beneath the Head of Customer Experience, who has area management responsibility for our 2 South West Trains contact centres; our Customer Service Centre and our Video Contact Centre. Within the Customer Service Centre, there are a team of managers and Team Leaders responsible for the day to day running of the centre and effective complaint handling.

South West Trains is committed to our Passenger's Charter which can be found on our website southwesttrains.co.uk/charter.

Complaints are regularly fed back into the business to different functions via monthly reports. These reports highlight data trends and patterns that our customers are complaining about in order for our managers to learn from our complaints, take action and improve our overall service.



Transport Focus

Freepost RTEH-XAGE-BYKZ, PO Box 5594,
Southend of Sea, SS1 9PZ

T: 0300 123 2350

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Customer Complaints Handling Procedure for South West Trains staff

To Review: September 2018



Contents

	Page
Introduction	2
How Customers Can Complain	3
Governance and Leadership	3
The Customer Service Centre – Processes and Protocols	4
Training Programmes	5
Acting Fairly for the Customer	6
Accessibility and Reach	6

Introduction

South West Trains (SWT) defines a complaint as 'any expression of dissatisfaction by a customer or potential customer about service delivery or company or industry policy'.

Customers contact us for the purpose of complaining, as defined above, but also to provide feedback. Our process to sort complaints from feedback and enquiries is to be aware of expressions of dissatisfaction within a customer contact. The Customer Service Centre agent will then make a decision whether the contact is a complaint or feedback, and make steps to respond to the customer accordingly. As such we will ensure that we utilise a wealth of channels to capture these comments. We also understand the value of resolving difficult situations our customers may face, therefore we will empower our front line teams to resolve these issues where appropriate. If you are unsure how to deal with a customer complaint, please ask your supervisor, line manager or the Customer Relations team.

We will consult with appeals watchdogs Transport Focus and London TravelWatch before making any formal changes to this procedure.

Customers who remain unhappy with the outcome of their complaint to SWT can contact Transport Focus or London TravelWatch, which may be able to pursue the complaint on a customer's behalf.

South West Trains are ultimately committed to answering every customer complaint promptly and fairly to lead to continuous improvement to the customer experience.

A message from Head of Customer Experience, Christian Neill:

'At South West Trains, we are committed to continually improving the Customer Experience. Whether that is onboard the train, at the station, or via digital media, we are working hard to ensure the service our customers expects is the service they receive. Our hope is that this document on how to comment on the service you receive is clear and informative, enabling staff to understand what to do, should the service customers have received not been to the standard we work to constantly deliver.'

If you have any questions on the Complaints Handling Procedure, please do not hesitate to contact the Customer Service Centre Management Team via cscmanagers@swtrains.co.uk. Thank you.

How Customers can Complain

We want to encourage feedback from our customers or potential customers and that is why we are committed to ensuring we offer a variety of channels for our customers to get in touch;

A – In Person

All SWT colleagues are briefed in how to handle customer complaints; this may involve signposting to the relevant channel such as our dedicated in-house Customer Service Centre. If you are unsure how to respond to a customer complaint, ask your supervisor or line manager. The SWT Training School also offers training and development in different areas of customer service.

B – Via our website southwesttrains.co.uk

Customers will be able to access our feedback and complaints webpage within 2 clicks of the homepage. The webpage will detail how to get in touch with our customer service teams via various channels. We will actively review and update our website FAQs to allow our customers to find the information they need.

C – Via Facebook and Twitter

SWT have a presence on both Facebook [/swtrains](https://www.facebook.com/swtrains) and Twitter [@sw_trains](https://twitter.com/sw_trains). We will use social media channels to push out key messages, including how to complain with links to our Contact-Us and Complaints sections on our website, to our customer base. We also recognise this is a growing channel for customer feedback and we will use data analytics software to ensure that we capture the root cause of complaints. Additionally, there is a customer facing social media policy outlining our approach to our social media channels available to download from our website.

D – Via our Customer Relations team

Our dedicated in house Customer Service Centre will be open 7 days per week, 363 days per year, during the hours of 06:00 through to 22:00. After 22.00, telephone calls are redirected to National Rail Enquires who can help with the majority of customer queries.

Governance and Leadership

Our Managing Director looks after an executive team of Directors who are responsible for different areas of the company. Complaints sits under the Customer Service directorate, under the Customer Service Director. Customer Service is divided into a number of functions including Stations, On-Train and Retailing. Customer Experience is one of these functions which is looked after by the Head of Customer Experience. The Contact Centres Manager sits beneath the Head of Customer Experience, who has area management responsibility for our 2 South West Trains contact centres; our Customer Service Centre and our Video Contact Centre. Within the Customer Service Centre, there are a team of managers and Team Leaders responsible for the day to day running of the centre and effective complaint handling.

South West Trains is committed to our Passenger's Charter as laid out in our Complaint Service Standard and on our website. We also have visions, values and behaviours that our staff live by, as well as an internal 'I Make the Difference' culture.

Complaints are regularly fed back into the business to different functions via monthly reports. These reports highlight data trends and patterns that our customers are complaining about in order for our managers to take action and improve our overall service, and inform Key Performance Indicators for different departments. These complaints are then used for strategic future planning in different areas around the business, in order for us to continually make the difference for our customers. In addition, complaints are fed back to the Executive team weekly via reports that capture key data and trends. These are then discussed at Board who identify emerging patterns and categories, in order to set strategies directly influenced by customer complaint numbers.

The Customer Service Centre – Processes and Protocols

South West Trains' in-house Customer Service Centre is open 363 days a year (we are closed Christmas Day and Boxing Day), 7 days a week between the hours of 06:00 and 22:00 to answer customer complaints. We employ 65 members of staff which includes Customer Service Advisors, Customer Service Centre Team Leaders and the Customer Service Centre Management Team.

In addition to permanent members of staff, we also employ third party contractors from agency firm STM. This is to assist with administration tasks and times where we experience a large volume of complaints. There is a service level agreement in place for STM agents to be fully aware of, and adhere to our Complaints Handling Procedure at all times.

When complaints are made against a specific member of staff, an internal fact finding investigation will take place which includes the use of CCTV where it is available. This investigation is aligned to our Human Resources policies and procedures to protect both our customers and our staff. If you are unsure of this process, please speak to your Human Resources Business Partner.

When a customer has been injured at one of our stations or on one of our trains, a thorough safety led investigation will complement the complaint. This is handled by safety and claim specialists throughout, often with advice from our legal team.

The secure protection of our customers' data is a key priority for our teams. We have published a customer-facing privacy policy on the SWT website to reflect how we handle our data. SWT will comply with the Data Protection Act 1998 (DPA).

We understand that there may be occasions where third parties wish to conduct research with complainants to learn about their experiences. SWT fully comply with data protection laws and complainants are advised via the Terms and Conditions they agree to when submitting a complaint that their information may be used. All data is held securely in accordance with law, and complainants have the right to access their data, and should enquire through the our dedicated Customer Service Centre.

All our customer contact data and associated documents are electronically logged in our Customer Relations software, and are never deleted. These remain the source for any future correspondence with the customer. Hard copies of customer contact data and associated documents are sent for confidential shredding approximately every three railway periods.

SWT is devoted to delivering a high quality service to our customers and potential customers who may get in touch. If our Customer Service Centre becomes aware that the correspondence relates primarily to another train operator or service provider, we will answer the customer as fully as possible. We will then transfer the correspondence on to the relevant organisation on behalf of the customer and will inform the customer of this, along with the organisations' respective contact details.

SWT will acknowledge all customer contacts received by our Customer Service Centre. We will aspire to not only meet the industry standard, of providing a full response to 95% of complaints within 20 working days, but to exceed by working towards challenging internal targets and thus providing a truly timely response to our customers. Unfortunately, there are times when we experience 'backlog' to customer correspondence in the Customer Service Centre and miss these targets. This is often due to a particularly bad day of disruption that generates a large amount of customer contact. In the event of us missing our 20 day response targets, we will inform the ORR, London Travelwatch and Transport Focus as soon as possible, and enter strategic planning to bring our percentages back up to 95%. When this happens please bear with us, we will be working hard behind the scenes to clear this backlog of complaints as quickly as possible.

In the event of an emergency or if we experience disruption, we are committed to still providing an excellent service and have contingency plans in place. We work closely with agency staff who can provide us with staff within 24 hours' notice, who can help us take calls from customers and respond to all written correspondence.

Training Programmes

At South West Trains, we are committed to ensuring our staff are trained to the highest standards and possess the skills and resources they need to perform their roles effectively.

When a vacancy becomes available in the Customer Service Centre, this role is advertised both internally to South West Trains staff, and also externally via our dedicated Recruitment website. This includes all the information about the role including responsibilities, location and often salary. Applications are then screened via our in house Recruitment team before interviews take place in our Human Resources department by Customer Service Centre Managers. Interviewing managers look for key competencies in potential members of staff that align with our organisational visions and values.

When a member of staff has been successfully appointed they undertake a Staff Induction with South West Trains. This is an introduction into South West Trains in our Human Resources department which covers our history and background and lays out all our key policies and procedures the employee must comply with. A local induction then takes place in our Customer Service Centre, where the employee meets the team and learns about the processes and the varied work-streams within the Centre.

The member of staff then undergoes training in our Customer Service Centre. We have a dedicated training pack that the member of staff works through, often with a colleague or a Team Leader to aid their understanding. In addition to this, the new member of staff will sit with team members who specialise in 'coaching', to shadow them through their day to day activities. This is where the member of staff learns about the complaint process, how to investigate fairly and promptly and to always keep the customer informed. This process takes about 4 – 6 weeks until a member of staff 'goes live' in our Customer Service Centre, but there is always a Team Leader on shift to turn to for support.

South West Trains is committed to the ongoing development of its staff. Through effective one to ones and 'Time With Your Manager' sessions, training needs and development opportunities are identified. Staff can then go on courses, workshops and work shadowing to aid their learning and development and to learn more about the company and the industry.

All the staff in our Customer Service Centre undergo 'Quality Monitoring' which ensures the high standards we expect from our employees are constantly maintained and delivered. When a member of staff is found to be underperforming, we have 'Performance Improvement Policies' in place to help aid, support and develop this member of staff. Our Customer Relations software allows us to specify, as a percentage of contacts answered, the volume of contacts to quality check. At present this is set to 10% as this is the contact centre industry benchmark. When staff are new to answering contacts we increase their quality check to 25% of cases answered.

South West Trains is also committed to empower our frontline teams, to resolve queries on the spot if they are able to. Staff are briefed in dealing with customers through internal communications and their line managers in order to effectively deal with customer queries and feedback. If you are unsure of these processes, please speak to your supervisor or line manager. In addition to this, our frontline staff also undergo extensive customer service training to deliver an excellent customer service.

Acting Fairly for the Customer

We recognise that communication is key when handling a complaint. We will ensure that within our automated acknowledgment response, details are provided to advise on our standard timescales via our Passenger's Charter. When updates are provided full contact details will be included, providing a more direct option to contact us if needed (i.e. by telephone call).

We are committed to conducting a fair and thorough investigation to all customer contacts. Upon receiving a complaint, we take the steps to gather evidence from different areas of the business to fully assess the issues before giving the customer a response. We will try to call you where possible, but we ask that when you receive an email from the Customer Service Centre enquiring about an issue, you respond within 4 working days. We try to provide as much detail as we can to the customer in compliance with data protection, to come to a mutually agreed outcome and solution for the customer.

SWT will correspond with customers in the most clear and transparent way. Where we feel we can resolve the complaint through a telephone engagement call, we will actively look to do this, when we feel it is in the customers' best interest.

We are committed to getting a positive resolution for our customers. We will continually work to ensure that we make it right for the customer. In line with industry and European guidance we will signpost passengers to the relevant industry watchdog, such as Transport Focus or London TravelWatch, and inform of the current Alternative Dispute Resolution arrangements. This may well be in spite of the fact we are still in dialogue with the customer.

Sometimes it may be necessary for a complaint to be escalated throughout our management chain, this can be at the request of a customer or through a member of staff's initiative. In this instance, a complaint will be sent to a more senior manager for their reference and action, who will then feedback to the customer usually via a member of staff in our Customer Service Centre. As a manager, when you receive a complaint, please

respond to the Customer Service Centre within 4 working days, so we can respond to the customer as quickly as possible. Throughout this process, the Customer Service Centre Management team are kept informed and can track the complaint through this channel, should the customer require an update on the status of their complaint.

SWT will ensure that all outstanding concerns are addressed when corresponding with a customer at the point of resolution.

Accessibility and Reach

South West Trains considers accessibility and reach to be the means available to passengers to provide feedback and the ease of doing so, taking into account the needs of all customers including those with different types of disabilities.

Details on how and to whom a passenger can complain will be available in all major publications (i.e. timetables, customer updates), be prominently displayed at our stations, on our SWT website and via our Facebook and Twitter accounts. Where we have stations, at which other train operators call, we will make clear the different contact points for complaints about different services.

SWT are dedicated to publishing our material in plain English without the use of railway jargon. We want to be as clear as possible to all of our customers to ensure accessibility and understanding.

SWT want to be as transparent as possible with our complaints handling process. We will ensure that our customers are clear on the channels to which they can make a complaint or provide feedback, where we can, we will also ensure that we proactively collect the necessary information required to investigate and resolve a complaint. There is also an external, customer facing Complaints Handling Procedure available on the SWT website that you can direct customers to for more information. In addition, our Complaints Services Standards will be published on the SWT website and will be easily accessible for our customers to view.