

**John Larkinson**

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5 September 2014



Angie Doll  
Head of Service Quality  
The Go-ahead Group Plc

Dear Angie

**Approval of Govia Thameslink Railway Limited's Complaints Procedure (Condition 6 of the Station Licence and GB Passenger Statement of National Regulatory Conditions)**

Thank you for your email of 22 August 2014, in which you provided a copy of the final version of your Complaints Handling Procedure (CHP) for the Govia Thameslink franchise. The franchise will commence on 14 September 2014. Your CHP is attached and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your CHP against the 2005 "Guidance on Complaints Handling Procedure" and approve it as meeting the requirements of Condition 6 of the station licence and GB Passenger Statement of National Regulatory Conditions (SNRP).

Your CHP was originally submitted to ORR on 1 August 2014. The submission included the comments that you had received from Passenger Focus and London Travel Watch. You noted that you had accepted all of those comments and that these had been incorporated into the draft.

We provided our comments to you on 6 August. The main areas we asked you to clarify included:

- Investigation process – You added a section on the roles and responsibilities within your organisation to help explain the authority that complaint handlers have, as well as the responsibilities of other members of staff;
- Appeals – You provided additional clarification on your processes for managing appeals from London Travel watch or Passenger Focus. You also explained to us that Go-ahead are currently undertaking a joint review with Passenger Focus of the appeal process. The review is on-going and its outputs will be included when your CHP is next revised; and,
- Training – You have provided additional information on how staff are trained and how this supports continuous improvement.

We note that you are commencing a new franchise and encourage you to review your CHP once you have practical experience of running the franchise.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'John Larkinson', with a stylized, cursive script.

**John Larkinson**

**Director, Economic Regulation**

# Thameslink and Great Northern Complaints Handling Procedure

Your questions answered



September 2014

# Complaints Handling Procedure

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## 1. Introduction

You and your feedback are vital to us. We are committed to taking any complaints seriously and to using the insight we gain to make changes that improve our business.

We know it is very important for you to be able to make complaints easily and that we respond politely, with a promise of redress or action when appropriate. Where we have got it wrong, we will accept responsibility and say that we are sorry.

We have designed our Complaints Handling Procedure (CHP) to ensure that we investigate your complaints fully, and give them fair and careful consideration.

### What is a complaint?

A complaint is when you tell us that you are dissatisfied with our service or our policies, or those of our industry partners. You don't have to have bought a ticket to complain - you can make a complaint if you find any aspect of our service unacceptable. It may related to:

- The quality and standard of services and facilities
- Failure to provide an advertised service
- Treatment by or attitude of a member of our staff or contractor
- Inappropriate behaviour of a member of our staff or contractor

## 2. How to make a complaint

You should make a complaint as soon as possible so that we can investigate and resolve it promptly. There are various ways you can complain to us.

### 2.1 How to contact us about your complaint

#### In person

As all our staff have had customer service training, you can talk to any them. When dealing with your complaint our staff will consider:

- Can they resolve it on the spot by giving you an apology, explanation or alternative solution?
- If they can't, can another member of staff help to resolve it then and there?
- Do you they need to refer you, or send your complaint to our Customer Services team for further investigation?

If you are complaining directly to our staff about something that lies within their area of responsibility, they will make every attempt to resolve it then and there. If the responsibility for the problem lies elsewhere, they will tell you how to contact our Customer Services team.

You can also talk to local station managers. You may have to make an appointment to speak to them as they are in charge of more than one station.

We hold regular Meet the Manager events. You can find out when and where we hold them on [thameslinkrailway.com](http://thameslinkrailway.com) and [greatnorthernrail.com](http://greatnorthernrail.com).

#### In writing

You can make your complaint in writing in several ways. You can:

- Fill out a customer comment form and either hand it in at a station or send it directly to Customer Services. You can ask for a form at any staffed station
- Send us an email
- Send us a tweet
- Complete the feedback form on our website

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- Write us a letter

At unstaffed stations you can find our Customer Services contact details on the information poster.

## By telephone

You can speak to a member of the Customer Services team from 07:00 to 22:00, every day except Christmas Day.

When you phone us you'll get through to our answering service almost immediately. You can then choose from the options on offer to speak to a member of our Customer Services team. We aim to answer 97% of all calls, 80% of them within 30 seconds.

## By textphone

If you have a hearing impairment you can contact us by textphone from 07:00 to 22:00, every day except Christmas Day.

## 2.2 Information to include in your complaint

It helps us if you can state clearly what happened, why you are making a complaint, and what you would like us to do about it. Please also send us any supporting documents you have, such as tickets or photos, as these help us to deal your complaint and often speed the process up.

The more information you can give us the better, please try to include the following:

- Your title and full name
- Your contact details: email, mobile or phone number and your preferred method of communication
- Your full postal address
- Date, time and location of the incident
- If the incident was on a station, the name of the station
- If it was on a train, the time and destination of the train
- If your complaint is about the condition of a facility, where it is, for example:
  - Waiting room on platform two
  - Toilet in the third coach of the train

## 3. How we deal with your complaint

### 3.1 Overview

We have designed our CHP to be simple and streamlined, giving our well-trained staff responsibility to resolve your complaints as quickly as possible. They know when they can deal with a complaint themselves, and when they should refer it upwards.

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 Services 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.

When we deal with your complaint there are three key questions we consider:

- What are the specific issues?
- What is your expected outcome?
- Is your expected outcome reasonable or achievable?

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When we reply with our full response, we will address all the issues you raised in your complaint, and explain the reasons for our decision. Your complaint will then be on the recorded on our database as closed.

So that you can be sure that we will investigate your complaint according to our CHP, you should make your complaint within 28 days of the date of the incident. This is the same as time limit set in the National Rail Conditions of Carriage for claiming a refund for a delay. We may consider complaints made later than this, depending on the circumstances.

## 3.2 How long we will take to deal with your complaint

The length of time it takes us to resolve your complaint depends on the complexity of your complaint and what it involves.

You should note that the following timescales refer to the day our reply leaves our offices, so please allow time for delivery. For this procedure we define working days as Monday to Friday, not including weekends or Bank Holidays.

During times of unusually high demand we're sometimes unable to meet the response times below. In these cases, please bear with us, we will respond to you as quickly as possible and will keep you up to date on our progress every 10 days.

### Simple complaints – response within five working days

Our aim is to resolve most complaints quickly, so please contact us as soon as possible with the information listed in section 2.2.

We can generally give you a quick response if your complaint arises from an incident we're already aware of. For example, your journey was delayed because of a signaling problem or heavy snowfall. In these types of cases we won't need to do extensive investigations because we already know the facts of the case and can get back to you quickly.

We aim to send you a full response to a simple complaint within five working days.

### More complex complaints that need investigation – response within 10 working days

We try to resolve the majority of complaints within five working days. However, some complaints can take longer to resolve as they need further investigation. This can be the case if:

- Your complaint is about several issues
- Your complaint is about an incident that we don't already have information on
- Your complaint is complex and we need to investigate it in more detail
- We need to ask one of our contractors, suppliers or another train operator for more information

We carry out investigations so that we can establish the facts of the incident and make a full and objective response to your complaint. For example, our inquiries could include:

- Talking to staff
- Getting statements from witnesses
- Looking at CCTV footage
- Getting data from our automatic ticket gates or smartcard systems

We will let you know that we've received your complaint, and that we're making further investigations. Our aim in these cases is to reply in full within 10 working days.

However, we may not be able to meet this deadline for all investigations, as some information takes longer to collect. In these cases we will not take longer than 20 working days and will keep you up to date on our progress every 10 working days.

## 3.3 What you can do if you're not satisfied with our response

### Internal appeal

If you're not happy with the way we have answered your complaint, please contact us again and we will look at the issue again and reconsider our position. You should tell us why you want to appeal, for example:

- We didn't cover all your points
- You don't agree with our decision

A senior member of the Customer Services team will review your original complaint and our response. He or she will re-examine the facts, taking into account the reasons why you're not happy with our response; and write to you again telling you whether we stand by our original decision or have revised it, and why. We will write to you within working 10 days of receiving your request for an appeal.

We will also include contact details for either Passenger Focus or London TravelWatch (consumer bodies set up under Acts of Parliament to protect passengers' interest) unless we are confident that we've fully addressed your concerns.

### Appeal to external watchdogs

If you're still unhappy with our response you may wish to appeal to Passenger Focus or London TravelWatch.

You will need to send them copies of all your correspondence with us so that they can investigate it. They will consider whether we answered all the issues you raised and if our response was factual and contained accurate information. If they think that we haven't handled your complaint appropriately they will ask us to reconsider.

You can contact Passenger Focus about any issue about stations and journeys on Thameslink and Great Northern routes, except those that are in the area covered by London TravelWatch, as listed below.

You can contact London TravelWatch about any issue for:

- Journeys within Greater London
- Journeys between Stevenage and London Kings Cross/Moorgate (inclusive)
- Journeys between Bedford and Gatwick Airport (inclusive)
- Journeys between Blackfriars and Sutton/Wimbledon or Sevenoaks

They may ask us for your personal details in order to pursue your complaint. Please see section 9 for their contact details.

## 3.4 Unacceptable complaints that we may not take it any further

Our staff are trained to remain polite at all times. If you use abusive language or an aggressive tone to them we may stop dealing with your complaint:

- On the phone: our staff may end the call
- In person: they may walk away, or ask a colleague for help. In extreme circumstances, the police may be called
- In writing: they will reply, but will tell you that it is unacceptable to address our staff in this manner

In addition, if we consider your complaint to be frivolous we may not take it any further.

We may also bring our correspondence to an end where it is clear that, despite our best efforts, we are unlikely to satisfy you.



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If we end our correspondence, it will be a manager who makes that decision. We will make sure that the matter has already been referred to Passenger Focus or London Travel Watch.

We will always tell you when we're about to stop dealing with your complaint, and give you the reasons why. If you write to us again about a different issue, it will be treated as any other new complaint.

## 3.5 Compensation

We will give you compensation in line with the National Rail Conditions of Carriage, and as explained in our Passenger's Charter.

Sometimes, if appropriate, we will offer additional compensation, or a goodwill gesture. This is usually in the form of National Rail Travel Vouchers, or occasionally a cheque.

You're entitled to compensation under our Delay Repay scheme if one of our trains is delayed by 30 minutes or more. You can find details of this scheme on our website at [thameslinkrailway/delayrepay](https://www.thameslinkrailway.com/delayrepay) or [greatnorthernrail/delayrepay](https://www.greatnorthernrail.com/delayrepay), or in leaflets at our staffed stations.

## 4. Other information

### If you have special requirements

If you need a response in a different format or language, we will do our best to provide it. If we don't have the resources to do this in-house, we will employ translators or ask disability groups for advice.

### Personal information

We will not give your personal information to any other organisation, except the following, and then only if it's necessary for our investigations:

- Other train operating companies
- Passenger Focus and London TravelWatch
- Other transport companies when you ask us to
- Any other public body carrying out its statutory function

When we talk to another organisation we will comply with the Data Protection legislation and guidance on handling personal information.

### Complaints about staff

As we expect our staff to be professional and polite to our customers at all times, we take any complaints about staff behaviour extremely seriously.

We will always pass any customer complaints or concerns about our staff on to the appropriate manager. They will investigate the complaint and take any appropriate action.

Where we can we will let you know the position of the manager carrying out the interview and the likely timescale of the investigation, but please be aware that we may not be able to tell you the outcome if it's covered by our employee/employer confidentiality agreement.

### Complaints about other train operators

All train companies follow the same principles for dealing with complaints. If your complaint includes services provided by another transport company, we will tell you this, and forward your comments to them within five days of receiving it.

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## Complaints about other organisations or contractors who provide services for us

We will deal with a complaint about another organisation or contractor providing services on our behalf in the same way as any other complaint, following this CHP. Our contractors include companies who provide:

- Cleaning services
- Car parking
- Customer services
- Facilities management
- Shops and cafes

We require our suppliers to co-operate with our CHP and provide any information we ask for when we're investigating a complaint. If they fail to do this we would escalate the matter to the supplier's account manager.

## 5. Claims for injury or loss

If you have an accident on one of our trains or at one of our stations, or you see something that you think is unsafe, please let us know as quickly as possible so that we can take appropriate action. We will always pass all comments and complaints about safety on to our Safety Department.

### Personal Injury Claims

If you have had an accident or are injured and you wish to claim compensation from us, you should write to us at:

**Thameslink and Great Northern,  
Hertford House,  
1 Cranwood Street,  
London EC1V 9QS**

### Damaged Property Claims

If your property has been damaged on our trains or at our stations and you believe we were to blame, please contact us with full details including the date and time of the incident. If possible, please keep the damaged item so that you can show it to us if necessary, or take photographs of the damage.

## 6. Roles and responsibilities for our Complaints Handling Procedure

### All staff

As you can make a complaint to any member of our staff, they are all aware of our CHP and how to handle and record complaints. We encourage staff to try and resolve complaints quickly and as close to the place and time of the incident as possible, but if they can't they will either give you the contact details for our Customer Services or send your complaint directly to them.

### Customer Services team

Our Customer Services team are trained to deal professionally with all your comments and complaints, and work to the guidelines laid down in the National Rail Conditions of Carriage.

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New members of our Customer Services team have a week's training that gives them a full understanding of our processes and procedures for handling complaints. Their training includes:

- Our company and our values
- How we expect our customers to be treated
- Interpersonal skills
- Technical skills so they use our systems effectively and efficiently
- Our procedures for handling comments and complaints

And information on:

- Railway geography
- Overview of the UK rail network franchise system
- Ticket types and validity
- Facilities on our stations and trains
- Our penalty fare scheme
- Our Priority Seating scheme

Following the initial training new starters work alongside an experienced member of the team, for a minimum of two weeks, who gives them one-to-one guidance and coaching, checking they have fully understood the complaint and reviewing responses before they are sent out. They also give feedback on how objective the new starter has been in handling the complaint.

Once they're fully trained they have the authority to handle complaints themselves. They also know when they need to refer a complaint to a senior member of the Customer Services team.

In addition we give them ongoing training and support when policies change, when they are returning from long term sick leave and, if necessary, after quality monitoring.

We conduct regular quality monitoring sessions to check the overall quality of complaints handling. We also check individual staff performance to see how quickly they resolve complaints and the level of satisfaction reported by customers.

## Senior Management

Our senior management team have overall accountability for the management and governance of our CHP and ensure that:

- An appropriately trained member of our Customer Services team signs off your complaint, so that you can be sure that we've taken your concerns seriously and have given you a definitive response
- We have a consistent approach at all levels of the company to the way we manage, monitor and review our CHP
- We use the feedback from your complaints to improve our service

## 7. How we review and monitor our Complaints Handling Procedure

This procedure, and the commitments we have made, are regularly monitored and audited. The information we learn from your complaints and comments is very valuable to us. We use it to help us make changes to our services and improvements to our stations and trains.

We produce internal reports on all comments we've received every four weeks, which give our directors and managers a better understanding of your opinions. The reports include:

- The number of comments broken down by type, including complaints
- The number of comments that are positive or negative

# Complaints Handling Procedure

- An analysis of whether this is an improvement or decline
- How the complaints handling supplier is performing against their service level agreement including response times and the amount of comments they've replied to

Our Customer Satisfaction Board, which is chaired by the chief executive, considers these reports every month. From this information, and other sources of customer feedback, the board can identify any improvements or problems, and track the impact initiatives are having on our performance. They develop improvement plans and nominate an executive sponsor for each one to oversee its implementation.

We also give the Department for Transport and the Office of Rail Regulation similar reports every four weeks. They use them to confirm that we are keeping to the promises we made in our Passenger's Charter.

Our customer relations manager reviews our auditing and monitoring procedures annually and makes changes to the CHP if necessary. We will consult with Passenger Focus and London TravelWatch during the review.

## 8. Our contact details

Email: **customerservices@thameslinkrailway.com**  
**customerservices@greatnorthernrail.com**

Twitter: **@TLRailUK**  
**@GNRailUK**

App: **Thameslink on track app**

Website: **[thameslinkrailway.com](http://thameslinkrailway.com)**  
**[greatnorthernrail.com](http://greatnorthernrail.com)**

Telephone: **0345 026 4700, 07:00 to 22:00 every day except Christmas Day**

Textphone: **0800 975 1052**

Address:  
**Freepost RRBR-REEJ-KTKY**  
**Thameslink and Great Northern**  
**Customer Services Department**  
**PO Box 443**  
**PLYMOUTH**  
**PL4 6WP**

## 9. Contact details for Passenger Focus and London TravelWatch

### Passenger Focus

**Email:** advice@passengerfocus.org.uk  
**Website:** [www.passengerfocus.org.uk](http://www.passengerfocus.org.uk)  
**Telephone:** 0300 123 2350  
**Fax:** 0845 850 1392  
**Address:** RTEH-XAGE-BYKZ  
Passenger Focus  
PO Box 5594  
Southend on Sea  
SS1 9PZ

### London TravelWatch

**Email:** enquiries@londontravelwatch.org.uk  
**Twitter:** @LonTravelWatch  
**Website:** [www.londontravelwatch.org.uk](http://www.londontravelwatch.org.uk)  
**Telephone:** 020 3176 2999  
**Address:** London TravelWatch  
Dexter House,  
2 Royal Mint Court,  
London,  
EC3N 4QN