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Richard McClean
Managing Director
Grand Central

Dear Richard

Approval of Grand Central Railway Company Limited Complaints Handling Procedure (Condition 6 of the 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 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 aim to provide a full reply to complaints within 10 working days, which we believe is likely to be positive for passengers.

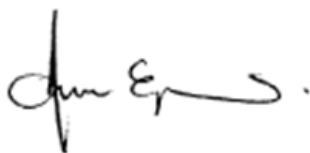
You have confirmed that where a complaint has not been resolved and your internal procedures have been exhausted, you will provide information on Alternative Dispute Resolution (ADR) to the complainant, in accordance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities 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, 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.



In the case of Grand Central 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', with a stylized flourish at the end.

Annette Egginton

Complaint Handling Procedures

What do we mean by 'complaint'?

We define a complaint as

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

Our staff are trained to differentiate between general customer feedback and specific complaints. In the event that this is unclear we will acknowledge your feedback and ask whether you would like it to be formally investigated as a complaint.

Our approach

When you choose to travel with Grand Central we hope your journey will be comfortable, and memorable for the right reasons. However, for the occasions when things don't go to plan we have procedures in place. Our procedures make it straightforward for you to get in touch and for us to resolve your complaint efficiently and effectively. Your feedback can help us provide a better service for you and all our customers, and we also have a process for ensuring this happens. Grand Central's procedures take into account guidance from the Office of Rail and Road (ORR), Transport Focus and London Travel Watch, and have been reviewed by them.

If you have any problems during your journey with us please make our on-board team aware. They are trained to help you and will try to resolve the issue as quickly and effectively as possible. Where possible, they will try to offer a solution there and then, or contact a supervisor or manager for advice if this is not possible. If we can't resolve things at the time, we will let you know how to contact our Customer Relations team.

You may want us to provide a formal response to your complaint. We have designed this procedure to ensure that we handle your issues as swiftly as possible. We are committed to making a full and fair investigation and will let you know what we will do to improve our service.

We continuously monitor customer feedback trends and share them with our Executive Board, senior managers and suppliers in order that a culture of continuous improvement exists within our company.

This procedure is aligned to the provisions of the Equality Act 2010 and we have made provision for people with special needs to access and use it. Our staff are trained to deal with complaints from people with diverse needs. If someone is unable or does not wish to contact us themselves, we welcome their representative (such as a carer or support worker) to get in touch on their behalf. You can read our Disabled People's Protection Policy document on our website at www.grandcentralrail.com

Our procedure

The complaint handling procedure is designed to make sure your complaint is dealt with efficiently, fairly and effectively. We make every effort to make sure our procedure is:

- easy to find and well publicised
- simple to understand and use
- provides a response within published targets
- ensuring each complaint is investigated fully and fairly
- respectful of confidentiality
- addresses all the points you raise

- regularly monitored and audited
- provides information to management so services can be improved
- complementary to the standards set out in our Passenger Charter.

Feedback mechanisms

Making a complaint directly to a member of staff

If you have a complaint during your journey please talk to a member of our on-train staff to allow them to resolve this on the spot. If they are unable to do so, support staff or a manager may be able to offer advice and help find a solution.

We also offer support to customers via our official social media channels.



@GC_Rail



facebook.com/GrandCentralRail

We do not guarantee a real time response to complaints or queries received in this way but customer feedback and queries are monitored during the majority of our train operating hours, seven days a week. If we cannot resolve your complaint on Twitter or Facebook or you want a formal acknowledgement from us or want to apply for compensation, the social media team will let you know how to contact Customer Relations or point you towards our online compensation claim form.

How to contact us

Where your complaint cannot be resolved on the spot or via social media, or if you have had an accident or wish to claim for damages you should write to our Customer Relations team as soon as possible and provide as much detail as you can. As a minimum please provide; time and date of the journey and where you travelled from and to, explain what went wrong, if possible provide details of your ticket and provide any other information you think is relevant or helpful for our investigation of your complaint. We will acknowledge your correspondence immediately and carry out a full and fair investigation.

Making a complaint to the Customer Relations team

Our Customer Relations team will make a record of your complaint, carry out an investigation and offer a resolution.

There are several ways to contact the team:

Phone: 0345 603 4852, select option 5

Text phone: 0344 556 0072

Opening times: Monday to Friday, 08:00 – 18:00
(Closed Christmas Day, Boxing Day and New Years Day)

Email: customer.services@grandcentralrail.com

Post: Customer Relations Manager
Grand Central Railway
PO Box 5871
Sheffield
S1 9GP

Outside of these opening hours, a recorded message will let you know that we are closed, and what our opening times are.

You can find our contact details on the Grand Central website in one click by choosing the 'Contact Us' option in the Helpful Links list on the home page.

Who will deal with your complaint?

Whenever possible, a complaint will be handled by one member of the Customer Relations team from when it arrives to when it is resolved. We will make reasonable endeavours to address all issues raised. All complaints will be fully and fairly investigated.

Our Senior Managers are regularly involved in these investigations and also receive four-weekly reports on the number and type of complaints received. As part of the Grand Central Business Plan they will take appropriate action to improve our service as a result of complaints and feedback received.

There are occasions where a customer feels so aggrieved with a particular experience that they feel the need to communicate directly with a Senior Manager or the Managing Director. If this is the case, please contact our Customer Relations team in the first instance in order for your complaint to be formally acknowledged and dealt with in a consistent manner.

How we will respond to your complaint

We aim to resolve your complaint as quickly as we can, taking steps to fully investigate the circumstances. We follow a six-step process, in line with the Office of Rail and Road's guidelines for complaint handling:

1. We establish the key elements of your complaint
2. We collect the relevant information
3. We analyse the evidence
4. We assess how this applies to your complaint
5. We identify the reasons things went wrong
6. We put together a response to you explaining what we found and what we will do.

Complaints about members of our staff will be investigated with the involvement of their line manager or a suitable senior manager. An internal investigation may be required, in addition to the points listed above.

We aim to send you a full reply within ten working days however during busy periods please allow 20 days for a response. If we are unable to give you a full response within this time, we will send you an acknowledgement and let you know when we should expect to hear more from us. At times when we have a large backlog of correspondence and are unable to reply within 20 days we will inform ORR, Transport Focus and London Travel Watch of this.

We will offer compensation when appropriate as explained in our Passenger Charter and in line with the National Rail Conditions of Travel. Copies of the Passenger Charter can be found on our website at www.grandcentralrail.com or by contacting the Customer Relations team.

Complaints and claims relating to other operators

Any complaint or claim referring to another operator's services, Network Rail or other agencies, will be acknowledged and forwarded to them. The other operator will respond to your complaint in line with its own complaint handling procedure.

Where the service was provided by a third party on Grand Central's behalf (for example a rail replacement bus service), we will ask the third party to help with the investigation and we will

send you a response which takes into account their feedback.

If your complaint is about buying a ticket and you did not buy it from Grand Central, we will pass the complaint on to that company and they will deal with your complaint.

Complaints and claims involving more than one operator

If you make a complaint involving more than one operator, we will follow complaints handling guidance issued by the Office of Rail and Road. We will either (dependent on the complexity of the case):

- Deal with our aspects of the complaint and advise you which aspects will be replied to by the other operator, or
- Co-ordinate a single response on behalf of all the operators involved.

If you are unhappy with our response

We aim to satisfy complaints with our first response and provide frank and honest responses to any concerns raised. If you are unhappy with our first response and you contact us again, your complaint will be reviewed and responded to by a manager. This second response will include the name and position of the manager and also explain the role of Transport Focus or London Travel Watch (see further information on page 7 of this document). You can contact Transport Focus or London Travel Watch at any time, and if you are not satisfied with a response from Grand Central you can raise an appeal with them.

If you have a complaint about how we have dealt with your issue you should contact us in writing. You can do this by letter or email. Our contact details are:

Post: Customer Relations Manager
Grand Central Railway
PO Box 5871
Sheffield
S1 9GP.

Telephone: 0345 603 4852, option 5
Monday to Friday 08:00 – 18:00
(Closed Christmas Day, Boxing Day and New Years Day)

Text phone: 0344 556 0072

E-mail: customer.services@grandcentralrail.com

To help us to resolve your issue quickly, please include

- Your full name
- Your full address
- Your day time telephone number
- Full details of your complaint, including the name of the person you spoke to
- Copies of any letters or e-mails relating to your complaint.

The Alternative Dispute Resolution 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). However, as Transport Focus and London Travel Watch 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.

Claiming compensation

We will offer you compensation in line with the National Rail Conditions of Carriage. Our Passenger Charter explains our compensation policy, including the levels offered during service disruption. You can get our Passenger Charter from our Customer Relations team and from our website, www.grandcentralrail.com

We investigate all claims for eligibility against actual train running information and we will advise you if you are eligible to receive compensation or not.

When we won't respond to your complaint

Our staff are trained to remain polite at all times and to carry out a full and fair investigation of your complaint. We hope that our customers will treat our staff in a polite and courteous manner. We do not expect our staff to tolerate verbal abuse or threats or any other manner of intimidating behaviour from customers.

We reserve the right to terminate any correspondence or communication that we believe to be unreasonable, aggressive or abusive, and which specifically diverts resources or is vexatious.

We will fully consult with the ORR, Department for Transport (DfT) and Transport Focus before we terminate any correspondence and inform you in writing of the reasons behind our decision. This decision will be taken by a senior manager and we will refer you to the passenger watchdogs. This process is in line with complaints handling guidance issued by the Office of Rail and Road.

Confidentiality

We will not provide confidential information to third parties unless we have your written consent. We may however divulge some or all of your details without consent where it is necessary for us to fulfil our own obligations (this will include bodies such as other train operating companies, Transport Focus and insurers) or to bodies carrying out a statutory duty such as the DfT, ORR, ATOC or the Police. The ORR and ATOC may use your information for research purposes including contacting people who have complained to learn more about their experiences. You have the option to opt out if you do not want to be contacted.

Complaint records including passenger details are held in compliance with the Data Protection Act. In line with the Act your data will be held as long as is needed to process it for the original purpose it was obtained.

Insurance claims procedures

If you wish to make a claim for losses, property damage or personal injury this should be made in writing or by email to Customer Relations who will ensure it is forwarded to our Claims Handler.

The rail industry has an arrangement called the Claims Allocation and Handling Agreement (CAHA). We, like all train operating companies must comply with CAHA and your claims must be dealt with in accordance with this agreement.

Under the CAHA, 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 without involving the customer. Claims will be dealt in accordance with this agreement.

Contact information

We make it as easy as possible for you to contact us if you need to comment or make a complaint.

We publicise our contact details in the following ways:

- On our website, www.grandcentralrail.com
(one click away from the home page)
- On posters at stations and on our trains
- On our Customer Service leaflets and complaint forms which are available from the on train team and at some stations
- In our Passenger Charter and timetables
- Full contact details for Transport Focus and London TravelWatch are displayed on our website.

Contacting independent consumer watchdogs

Transport Focus and London TravelWatch are independent consumer bodies set up by Parliament to protect and champion rail users' interests.

We will always do our best to resolve satisfactorily all complaints, comments and concerns in a fair and reasonable way in accordance with the National Rail Conditions of Carriage, our Complaint Handling Procedures and our Passenger Charter.

However, if you wish to take the matter further you can contact Transport Focus or London TravelWatch. They will consider your case and where they believe it is appropriate, will follow things up on your behalf.

You can contact Transport Focus about any issue, except those that are entirely to do with London Kings Cross station.

Website: transportfocus.org.uk

Email: advice@transportfocus.org.uk

Phone: 0300 123 2350

Twitter: @TransportFocus

Post: Freepost RTEH-XAGE-BYKZ
PO Box 5594
Southend on Sea
SS1 9PZ

For issues that are wholly to do with London King's Cross station please consult London Travel Watch.

Website: londontravelwatch.org.uk

Phone: 020 3176 2999

Email: enquiries@londontravelwatch.org.uk

Post: 169 Union Street
London
SE1 0LL

People, processes and structure

Our Customer Relations team undergo training and regular refresher sessions to ensure they are familiar with company policies and procedures. They spend time on board our trains and understand how our service operates in practice. When a policy changes or the service undergoes development, they are briefed and provided with support to help them explain the changes to customers. A structure of supervisors and Duty Managers ensures that staff are managed and supported at all times and a point of escalation is always available.

We actively monitor our Customer Complaints Handling procedure to ensure it is effective. We do this in the following ways:

- Our Customer Relations team enter details of complaints onto our Complaints Management System, which allows us to record and monitor the number and type of complaints received along with the average response times.
- We monitor telephone calls to our Customer Relations team to ensure your complaint is handled in a friendly, appropriate and professional manner
- Our Duty Managers sample and review written responses made by our team to ensure complaints are dealt with appropriately and promptly.

Every four weeks the detailed information captured in our Complaints Management System is summarised in a report which is circulated to senior managers and our Executive Team, and reviewed at the monthly Senior Management Meeting. This report and an update on key customer feedback trends and plans for improvements is also circulated to and discussed by the Grand Central Board at their meetings. A summary of issues arising on social media and key metrics from Grand Central's Twitter and Facebook pages is circulated four weekly. Where appropriate, this data and insight is shared with suppliers to help them improve the element of the service they provide, and to track the outcome of changes they have made.

Organisational culture

The Grand Central brand is at the heart of all we do. We want people to feel moved to travel with us and for our staff and suppliers to feel moved to do their very best. Our brand drivers underpin every aspect of our business, including our Complaint Handling Procedures. We consider these five drivers to be our company DNA, and the cornerstones of a good customer experience:



Everyone at Grand Central, from front line staff to our Executive Team, understands how these drivers shape every interaction with our business. Each part of the company has a Brand Leader and a Brand Champion, who ensure we make decisions and deliver our service with these drivers in mind. They help maintain a continuous improvement culture, where we learn from feedback and make changes which will benefit our customers and our business. Our annual business plan is built around these aims.

Reviewing our Complaints Procedure

Our complaints handling procedure is reviewed annually and at any time we think that the procedure needs to be improved. The review will involve ORR, Transport Focus and London TravelWatch.