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Kevin Grix
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Dear Scott,

CONTINUOUS IMPROVEMENT IN THE RAIL OMBUDSMAN SERVICE

Thank you for your letter of the 08 July 2024, which followed a period of constructive engagement between our organisations and the associated parties involved in the programme of research activities. The activities commissioned by ORR have generated a range of extremely valuable insights, which in some cases serve to vindicate the direction of travel being taken and in others generate wholly new ideas for the enhancement of the service. As you have helpfully summarised the findings and actions to consider in Annex A of your letter, we have set out the Rail Ombudsman's continuous improvement plan by way of response to each point in the same format in Annex A of this letter. We will update ORR regularly on our actions taken in each area.

I would like to take this opportunity to reciprocate your comments made with regard to the Rail Ombudsman team; ORR's close cooperation and support throughout implementation and beyond have been invaluable. The relationship that exists between our organisations shows a clear commitment on the part of all concerned to continuing to deliver a Rail Ombudsman service that best meets its users needs, and evolves to ensure it continues to do so in to the future.

Yours sincerely,

Kevin Grix
Chief Executive and Chief Ombudsman

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1	<p>There were several findings across both the Savanta and Trajectory reports which found that general awareness and knowledge of the Rail Ombudsman was lower amongst certain demographics, such as younger people, lower socio-economic grade and ethnic minorities.</p>	<p>Targeted promotion of the service at groups with lower awareness and knowledge of the Rail Ombudsman.</p>	<p>ORR and the industry will recognise the complexities when appraising passenger awareness of the Rail Ombudsman. The challenge is to balance the desire to maximise passenger awareness of the service without undermining the established complaint escalation process, which requires the passenger to raise the complaint with a Rail Operator and give them the opportunity to resolve it first.</p> <p>However, we recognise that these research findings are pointing at a more nuanced issue concerning lower-than-average awareness levels for specific groups. The research pointed to lower awareness amongst younger people, for instance. This appears complementary to the Rail Ombudsman’s own findings around the often-lower levels of understanding amongst young people regarding the rules applying rail travel. In 2019, we launched the Young Person’s Train Guide, an educational resource for schoolchildren which was adopted and received a positive response. We propose to refresh and reissue this project during 2024, creating the opportunity to promote awareness amongst young people while also contributing to better public awareness of their rights and responsibilities when travelling.</p> <p>We will also actively engage relevant stakeholders to promote effective signposting by other organisations and will leverage our network to explore initiatives undertaken by comparable organisations in the wider Alternative Dispute Resolution landscape as well as the rail industry.</p> <p>It would be useful to consider promotional actions in the context of differing awareness levels across the rail complaint process and wider complaints landscape. To that end we are reviewing the landscape for relevant insight and approaches elsewhere, such as work published last year relating to the Parliamentary and Health Services</p>

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			<p>Ombudsman¹. The Rail Ombudsman would welcome further scoping activity via the Advisory Panels and in collaboration with ORR, such that the next steps may be taken with a shared understanding of all relevant factors. For instance, we should take steps to robustly scope the potential impacts of awareness-raising activity at an operational level, so that we jointly understand the bearing this has on forecasts and assumptions made. Awareness will be proposed as an agenda item for both Advisory Panels to consider when they meet this Autumn. The outputs of the meeting (which will be published via minutes) will inform pragmatic steps to take.</p>
2	<p>The Ipsos user experience survey reported a 19% decrease in satisfaction with overall experience for in-scope complaints from 2022 to 2023. This was amongst a range of other metrics that also identified a general decline in satisfaction ratings. The Trajectory report also pointed to similar findings.</p>	<p>Conduct analysis to identify the causal factors affecting satisfaction ratings. Some initial areas of improvement may include:</p> <ul style="list-style-type: none"> • Ensuring that investigations are undertaken methodically and consistently. • Creating a more standardised approach to customer responses to ensure greater consistency and quality in communications. • Ensuring that the rationale for decisions is 	<p>The Rail Ombudsman has critically evaluated the results of the Ipsos survey to identify tangible opportunities for continuous improvement and our analysis mirrors the actions to consider set out by ORR.</p> <p>We would be eager to recognise that our service is independently accredited by both the Ombudsman Association and Chartered Trading Standards Institute, which ensures standards impacting user experiences are met. Furthermore, satisfaction is a complicated metric for an Ombudsman scheme; our mission is to resolve disputes and where necessary make the right decision on a case. This is different to seeking satisfaction per se. Nonetheless the percentages show a decline based on previous years, which the independent body conducting the research set in the context of widespread dissatisfaction with the sector at that time.</p> <p>It is well established that case outcome plays a major role in perceptions of satisfaction. It was however striking to note that the</p>

¹ <https://www.ombudsman.org.uk/sites/default/files/PHSO%20-%20Complaints%20Research%20Report%20%28final%20version%20for%20publication%29.pdf>

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		<p>clearly set out and explained.</p>	<p>satisfaction scores for those with ‘mediation’ type outcomes had declined, when this outcome is a resolution that both parties were prepared to accept (i.e. not a decision made by the Ombudsman, with the clear potential to please one party and disappoint the other). We believe this shift may be attributed to targeted work to better manage consumer expectations during the mediation stage that took place during 2023 i.e. consumers settled at mediation for smaller sums than they originally sought, where previously the case may have proceeded to adjudication.</p> <p>Our quality assurance processes will be used to greater effect – additional spot-checking is being used to pick up consistency and quality in communications. In addition, we are currently reviewing the templates we use to promote quality and consistency. We previously found that a templated approach to adjudications achieved considerable benefit. We are actively reviewing the information we provide early in the process at present. We are also examining the opportunity to improve responses to service complaints through a standardised template approach. Nonetheless, it is important to use templates as a framework and maintain the bespoke nature of Ombudsman communications, which conveys an understanding of the specific issues raised. New Ombudsman Skills training has been delivered to our case handling team in recent weeks, providing a refresher across the team, again to promote consistency and quality.</p> <p>Clearly explaining our decisions is fundamental to effective closure for both parties, so that the industry can learn and to give the consumer assurance that their complaint has been properly understood and considered. We know that there is a clear interaction between how effectively the rationale for decisions is set out and subsequent service complaints: clear rationales lessen the cause for complaints. As such,</p>

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			<p>how we explain our decisions – in plain English and without industry jargon – has been a prominent feature of our recent training. We will continue to brief and spot-check on this issue. We will continue to report to ORR regularly (through the periodic service review meetings) on the results of Quality Management, providing visibility of our progress. Our Quality Management System (which is ISO9001 certified) uses service complaints as a key driver for learning and improvement; this will allow us to track our progress in the areas highlighted by the Ipsos report as well as any other emerging areas for improvement.</p>
3	<p>The contract requires compliance to WCAG 2.2 AA standard. The RiDC report identified several areas across the website, portal, and CMS where the Rail Ombudsman was non-complaint. There were also numerous accessibility related suggestions for improvement noted across various reports that are worthy of consideration.</p>	<p>Create an action plan to resolve all WCAG issues, which may include reviewing:</p> <ul style="list-style-type: none"> • The locations of key information and documents on the website. • Design of headings and important text. • The password reset process on the customer portal. • The accessibility of the customer application form. • Availability of multi-format versions of key documents i.e. not just PDF because of their potential incompatibility with screen readers. 	<p>RiDC’s testing was part of an agreed transition to compliance with WCAG 2.2 AA, this standard having been released post contract award (the original contract requiring compliance with WCAG 2.1 AA). As such, the technical feedback presented by RiDC has been extremely helpful in embarking on the transition to WCAG 2.2 AA (the Rail Ombudsman website and consumer portal having been certified to WCAG 2.1 AA in 2019). At the time of writing, the Rail Ombudsman has sought quotes from website designers for an improved website that conforms to WCAG 2.2 AA, locates information in a more user-friendly way and recognises the feedback regarding design of headings and important text. We are also working with our consumer portal and Case Management System provider with regard to WCAG 2.2 AA conformance across those platforms and reviewing the password reset process. We expect to deploy systems meeting the new standard in the live environment (i.e. following robust testing) by early 2025.</p> <p>With the consultation of Scheme Members on the Rail Ombudsman’s annual Efficiency Review having concluded on 08 August, the industry has been supportive of funding the proposed enhancement to WCAG</p>

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		HTML would be the preferred publication format for accessibility ²	<p>2.2. AA. We are now moving to implement and expect the new site to be live by early 2025.</p> <p>A key change proposed is the adoption of HTML as a new format for publishing key documents. The Rail Ombudsman is now reviewing consumer-facing documents and determining which documents can be converted to HTML format for best effect. The information contained within our consumer-facing guidance documents (namely the Consumer Guide and Quick Start Guide) is available through our webpages, however the very detailed Rail ADR Service Rules and Eligibility Criteria, for instance, are only available in full in PDF format at present. This would appear a useful starting place in further enhancing the accessibility and user-friendliness of our information.</p>
4	The RiDC and Trajectory reports expressed some concerns about the language used by the Ombudsman being formal, academic, and occasionally overwhelming when corresponding with passengers. Use of simpler, plainer language could help make the service more user friendly and accessible for passengers.	Consider conducting a plain English language audit/review across all passenger interfaces.	<p>This feedback has been highly instructive as it demonstrates that although the Rail Ombudsman had already been working to make the language used to explain sometimes complex issues simpler and more accessible, there is still more work that can be done.</p> <p>The Rail Ombudsman has engaged professional Plain English consultancy services in the past to devise internal training for staff, from which refresher sessions are delivered. The team underwent the most recent round of training during July.</p> <p>To go further, we will conduct a Plain English audit across our passenger interfaces every 12 months (normally during November to align with the contract year) and will adopt a new internal style and terminology guide. This work is being informed by our Independent Assessor, Kathryn Stone OBE, who is also feeding back opportunities to</p>

² [Why GOV.UK content should be published in HTML and not PDF – Government Digital Service \(blog.gov.uk\)](https://www.blog.gov.uk/2019/05/why-gov-uk-content-should-be-published-in-html-and-not-pdf/)

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			<p>adopt more user-friendly and accessible language. This internal style and terminology guide, which is being applied across the different Ombudsman schemes we deliver, is due to be rolled out internally by the end of November. We will update ORR on its implementation and ongoing impact through the established quality management reporting in place.</p>
5	<p>There is a general observation that Rail Ombudsman publications are often written in a style that can be overly technical and legalistic.</p>	<p>Review processes for authorship and quality assurance of published documents to ensure use of plain language and readability.</p>	<p>As a quasi-judicial function, there is an inevitable degree of complexity to the issues we handle and some expectation of an authoritative command of the legalistic aspects. However, this should not preclude from the publication of quality documents that use the plainest language appropriate to ensure readability to the widest possible audience. We have reviewed our internal authorship/sign-off processes to ensure review by members of staff with both legal and non-legal backgrounds.</p> <p>Furthermore, we will embrace the opportunity to engage our team more widely such that individuals less familiar with a given subject matter may review material ahead of publication; this will help to address overly technical points being made, which often rely on familiarity with the matters at hand. Ordinarily, final versions of relevant publications will be reviewed by the Chief or Deputy Chief Ombudsman, Director of Public Affairs and Head of Process, Quality and Risk.</p>
6	<p>The RiDC report suggested that an accessibility toolbar or software could help to overcome some of the difficulties that users with accessibility needs might face.</p>	<p>Consider adding accessibility software or an accessibility toolbar to the website/portal/CMS e.g. Recite Me was one such application mentioned.</p>	<p>The Rail Ombudsman scoped this as a potential enhancement in 2023, so the RiDC suggestion is reassuring. We therefore provided costings for the adoption of such a toolbar (deployed in concert with the proposed new website) to the industry in the consultation we are required to conduct on the fee for the second contract year. With the consultation having now concluded, we are working towards</p>

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			implementation of this feature alongside our revised website by early 2025.
7	Following on from the finalisation of the RiDC mystery shopping fieldwork and subsequent report, there remained a couple of participants that were yet to receive their requested accessible version of documents. Following a check on 28 May 2024, the participants had still not received these documents.	Review process and timescales for providing accessible versions of documents to users.	Our supplier experienced delays in the production of the Easy Read format Quick Start Guide, and we would like to note that alternatives were available immediately. However, we appreciate that the test case was to provide a particular format, and this took too long. This has since been received. The Rail Ombudsman has recently been working with our supplier to further update this document and copies of the revised document will be available to service users online or in hard copy upon request. We anticipate completion imminently . We also learned valuable lessons from the RiDC testers about different Braille standards, which we have incorporated into our process for procurement of Braille documents following further engagement with subject matter experts. We will check whether a service user requesting braille requires Grade 1 or Grade 2.
8	As part of the RiDC fieldwork, one participant tried to use the available British Sign Language (BSL) translation service. Whilst the participant was able to get through to the BSL service, there was an issue then connecting to the Rail Ombudsman to speak with a case handler.	Contact the BSL service and resolve any connection issues.	Having tested the service, we have not been able to determine any connectivity issues at the Rail Ombudsman or SignSolutions end. While we cannot draw any definitive conclusions about the issue the tester experienced, we have since found the service to be fully operational. Giving further assurance, the service has been used successfully in the live environment previously – during the tenure of the ORR contract – to resolve a case through mediation. We will continue to test the service at least annually and will sight ORR on the results.

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9	Ipsos and Savanta reports suggested that passengers may appreciate being advised of likely response times when they contact the Ombudsman.	Consider options for advising service users of likely response times to their contact e.g. 'expected response time is currently'.	<p>The Rail Ombudsman will review the solutions available and will advise ORR accordingly. We understand that Rail Operators use response time messaging successfully and we therefore believe the Advisory Panels will lend useful insight this Autumn. We have held initial scoping discussions internally, considering both case and in addition contact (predominantly call wait time) aspects, in preparation for these discussions.</p> <p>Presently, KPIs drive (and measure) responsiveness at key stages of the process such as acknowledgement of in-scope disputes to the consumer within three working days and transfer of applicable out-of-scope disputes to the Statutory Appeals Bodies within three working days. The Rail Ombudsman routinely meets these targets (aided by our Case Management System which is aligned to this process), ensuring service users are reassured that their application is being considered promptly following submission. In addition to the outputs from the Advisory Panels, we will keep our approach under continual review, informed not only by the present research but also future consumer satisfaction monitoring.</p>
10	The Rail Ombudsman's Deep Dive report identified numerous areas where there may be opportunities to make improvements for passengers across the rail sector. These should be followed up by the relevant parties with support from the Rail Ombudsman.	<p>The Rail Ombudsman should work with Industry, Statutory Appeals Bodies (SABs), Rail Advisory Panels and other stakeholders to look at the following areas:</p> <ul style="list-style-type: none"> • More effective signposting of passengers to the Rail Ombudsman, ensuring that all contact channels are clearly and consistently highlighted. 	<p>The Rail Ombudsman has worked closely with stakeholders on these themes and welcomes ORR's call to action arising from our Deep Dive report. We believe the Passenger Advisory Panel (on which the Statutory Appeals Bodies sit) and Rail ADR Scheme Member Panel will be effective forums for discussing how the Rail Ombudsman can further contribute to progress.</p> <p>The signposting of passengers by Rail Operators to the Rail Ombudsman at the appropriate time is closely regulated by ORR, but we can assist with this work through continuing to highlight the impacts of unclear/inconsistent signposting as they arise.</p>

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		<ul style="list-style-type: none"> • Improving cooperation between TOCs and third-party retailers (TPRs) in complaint handling. • Improving TOC to TOC complaint transfers. • How to improve Rail Ombudsman demand (case volumes) forecasting. • Complaints being escalated to the Rail Ombudsman that have not been fully addressed by the TOC. • How to remedy passenger confusion with advance ticket terms and conditions when a service is cancelled. 	<p>We are keen to support the sector in improving cooperation between Train Operating Companies (TOCs) and Third Party Retailers (TPRs) and would welcome the opportunity to contribute our insights further. As ORR will be aware, we have no jurisdiction over TPRs but would welcome discussions about future membership to play our part in facilitating improved cooperation between TOCs and TPRs in the escalated complaint process.</p> <p>Improving TOC to TOC complaint transfers has been a recurring theme of the recommendations made by the Rail Ombudsman to the industry; we are seeking progress through the review of relevant recommendations via the Rail ADR Scheme Member Panel and our engagement with the industry via the Redress Support Group led by Rail Delivery Group.</p> <p>Having engaged extensively on the subject of Rail Ombudsman case volume forecasting with industry and ORR, we welcome further perspectives to ensure the optimum approach is taken and, if possible, enhanced. Presently, the quarterly demand forecasting supplied to ORR uses a projection based on trends in Rail Ombudsman case volumes. Referrals to the Rail Ombudsman are inextricably linked with industry complaints and historically have followed industry complaint volumes quite closely, which limits the value of available industry complaint data to the very near term. To that end, we recognise and appreciate the efforts made by ORR to furnish the Rail Ombudsman with industry complaint data as promptly as possible.</p> <p>Complaints not being fully addressed by the TOC have been a consistent theme in our case handling and an area where we have made recommendations to industry as to how this can be improved.</p>

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			<p>The Rail Ombudsman believes this is an aspect of service that Rail Operators are able to control and take ownership of. The Rail Ombudsman is committed to supporting the industry and we should also note the positive and proactive work undertaken by the industry in this area, which includes some operators attending customer service and consumer law training delivered by the Rail Ombudsman. We will deliver a new Complaint Handling Best Practice webinar for the industry during 2024.</p> <p>Passenger confusion regarding advance ticket terms has also been a recurring theme observed in our case handling and led us to make several recommendations to industry on how to improve this. The Rail Ombudsman’s Annual Review 2023 – due to be published soon – includes a case study on this theme and we would invite the industry to implement changes we have recommended. We would also welcome the opportunity to discuss this theme further through relevant industry forums outside the Rail ADR Scheme Member Panel.</p>
11	<p>There is a general observation that more granular trend analysis of cases could be undertaken by the Rail Ombudsman.</p>	<p>Consider if quarterly statistical releases could offer more analysis and insight into emerging trends in case work at an industry and individual operator level.</p>	<p>The Industry Reports have been subject to consultation, but we propose to keep this under review on an ongoing basis; the Rail Ombudsman would welcome further dialogue with the interested parties to ensure these reports continue to suit stakeholders’ needs. The Rail Ombudsman quite recently began to capture industry offer value data, in addition to the established award value data already presented, so this could be a useful addition.</p> <p>It is important to note that very granular information is available to operators, ORR and the Statutory Appeals Bodies directly via the Rail Ombudsman’s Case Management System i.e. the quarterly statistical releases referred to seek to balance granularity with an appropriate document length.</p>

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			<p>Through our casework and engagement with stakeholders, we know that the most actionable insight is often drawn from case study type approaches, which complement statistics. While the frequency of publication is best driven by casework itself, we expect to publish case studies not less than every six months, ensuring emerging insight is shared in a timely manner.</p> <p>The Rail Ombudsman’s quarterly statistical releases are complemented by the recently published Deep Dive Report commissioned by ORR. This permitted in-depth analysis across a greater time period and we would welcome opportunities to revisit this type of insight in future.</p>
12	A mystery shopper in the RiDC research proposed that a disabled persons’ helpline number could be beneficial to some passengers with additional support needs.	Assess the potential benefits of a disabled persons’ helpline number.	<p>We found this suggestion interesting and propose to assess the potential benefit via the Advisory Panels this Autumn and keep the matter under review.</p> <p>Subsequent to our initial review of the findings, it was confirmed that this was a suggestion raised by an individual tester, rather than a formal recommendation on the part of RiDC, so we would be eager to further explore perspectives on the implied benefit. Our objective is to provide the highest possible standards of service to our users, including those with additional support needs. It was unclear to us what a dedicated helpline might be seeking to achieve, when we believe <i>all</i> our operatives need to be capable of delivering all the support necessary for any service user. To that end, we deliver disability awareness training across the team, not to dedicated individuals, which could introduce operational/resourcing risks unnecessarily. Disability Awareness Training bespoke to the rail landscape was delivered in 2023 by Disability Rights UK, and we have used the knowledge gained to deliver internal refreshers subsequently.</p>

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			We will continue to train widely on disability awareness, making use of external subject matter experts with lived experience of disability as appropriate.
13	The RiDC research identified that the wording of some website links suggested to the user they would be going to one location but took them to a different or unrelated page.	Undertake a website hyperlink and navigation accuracy review.	We are undertaking a review of the website and making changes where immediately actionable. In addition, the revised website to be deployed in early 2025 will by necessity mean a resetting of content and the opportunity will be taken to enhance user-friendliness and accessibility beyond the current site.
14	In the RiDC research mystery shoppers stated they experienced some anxiety when using the online portal and webform owing to the lack of confirmation that the voluminous information they were inputting was being saved.	Ensure that any timeout/autosave message is clear on the portal.	This is especially helpful feedback, because we are conscious of the need to balance a comprehensive application with accessibility and user-friendliness. At present, “Save and Exit” is located next to “Continue”. Whether the information is being preserved in the course of populating a page was unclear to the testers and the Rail Ombudsman is reviewing the potential solutions including the opportunity to enhance messaging, as part of the work being undertaken with our supplier on the accessibility of the consumer portal. The review of options will conclude during September 2024.
15	There is a general observation that the Ombudsman may benefit from capturing more detailed information on passengers who use the service. This could help the Ombudsman better understand which passengers’ groups may be	Consider options for capturing more detailed information on Rail Ombudsman users and prospective users.	The Rail Ombudsman welcomes insight revealing possible barriers to access that could be addressed. There is a balance to be struck when weighing the implications of asking service users for non-essential information when they raise a case with the Rail Ombudsman. On one hand, we want to make the process as quick and hassle-free as possible for users by only asking for essential information required to fully investigate their case. However, in doing so this denies us the opportunity to learn more about those people who raise cases, and those who do not.

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	<p>underrepresented in the user profile and reveal possible barriers to access.</p>		<p>The Rail Ombudsman would welcome further dialogue with the Advisory Panels and ORR to scope the merits and practicalities of putting this in place. We believe there may be complexities to navigate around the collation of some of this information, namely Special Category Personal Data especially where its collection is associated with a live case, and we would welcome more insights from organisations with experience of capturing this sort of information and how it is used.</p> <p>We are aware of some negative responses to the additional profiling conducted during the Ipsos consumer satisfaction survey for 2023 and would be keen to further explore approaches to performing this type of monitoring.</p> <p>It may be that this activity is better completed as a separate task rather than routinely in association with cases, especially at the application stage, where questions of profiling may be raised (and length added to a comprehensive application form). However, seeking the information once a case is closed may lend itself to a wholly independent assessment such as through the consumer satisfaction survey. An assessment of <i>prospective</i> users may lend itself to a wider sector collaboration exploring the user base and barriers to access.</p> <p>The Rail Ombudsman has discussed potential approaches internally but feels this area requires the guidance of our Advisory Panels this Autumn to further inform our engagement with ORR on next steps.</p>
16	<p>The RiDC research highlighted that the WhatsApp number at the bottom of the home page</p>	<p>Update the incorrect WhatsApp contact number on the website.</p>	<p>This error was rectified immediately upon notification of the issue and an audit of the accuracy of information displayed undertaken.</p>

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	is not the same as the one on the 'contact us' page.		
17	<p>The Rail Ombudsman's Deep Dive report noted instances where a Rail Operator either disagreed with a decision or did not understand the basis for the decision. In these scenarios and in accordance with established processes the Rail Operator was given the opportunity to refer these as service complaints to the Independent Assessor. However, there is a lack of transparency around how these cases are dealt with.</p>	<p>In the interests of transparency, the Rail Ombudsman should consider publishing statistics or more information relating to Rail Operator service complaints, and how these cases are handled.</p>	<p>The Rail Ombudsman's Independent Assessor publishes a report annually, setting out all formal complaints made. This includes those from Rail Operators, should any be escalated.</p> <p>The matters referred to relating to decisions are typically handled through routine relationship management activity between the Rail Ombudsman and the individual Rail Operator. The Rail Ombudsman has likely promoted such scenarios through a clear preparedness to enter dialogue on decisions. We believe that to have the best impact in the sector, we must be open to dialogue and being challenged to provide more information around decisions (and indeed recommendations) should not be conflated with service complaints.</p> <p>However, it is quite possible that this open dialogue could reduce the likelihood of a Rail Operator escalating a matter to the Independent Assessor (because any emerging issues are resolved without such recourse), but that is not to say there are not valid learnings the Rail Ombudsman can take. In the interests of transparency, therefore, we propose to publish a summary of any learnings/feedback derived directly from our engagement with the industry as part of future Annual Reports. It should also be noted that the Rail Ombudsman is now required to publish the results of its Scheme Member Experience Survey, which provides a valuable opportunity to view Scheme Member feedback to the Rail Ombudsman.</p>
18	<p>The RiDC mystery shopping fieldwork found that the textphone to textphone</p>	<p>Review current textphone arrangements and consider</p>	<p>The Rail Ombudsman began setting out its proposed transition to the Relay UK service during 2023, which is reflective of the continued evolution of our accessible contact options. We introduced our SMS</p>

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	<p>service did not work. Due to it not working the participant alternatively tried Relay UK, which worked well and provided a faster response than is typically experienced when using textphone.</p>	<p>potential benefits of transitioning to Relay UK.</p>	<p>contact channel several years ago following feedback from D/deaf service users that SMS would be more convenient than textphone. Our introduction last year of a WhatsApp channel represents a further upgrade, benefiting service users with specific communication needs or simply preferences. We are now in the process of fully updating our associated literature, having adopted Relay UK in place of the legacy textphone (the app-based service is now live). This process will be completed in line with the annual review of documentation carried out each contract year.</p>
19	<p>Two participants in the RiDC research with hearing impairments noted there was no BSL version of the Quick Start Guide. One suggested a short BSL translation video on the website.</p>	<p>Consider creating a BSL video recording of the Quick Start Guide for the Rail Ombudsman website.</p>	<p>The Rail Ombudsman has offered a BSL translation service since 2018 and agrees that a BSL video version of the Quick Start Guide would be a valuable enhancement. We therefore costed for its creation and included this improvement in the consultation described under point 6 (accessibility toolbar). With the consultation having concluded on the 08 August, we are moving to place the order with our supplier for immediate creation. Whether this feature can be deployed on the existing website or on the revised website is subject to further scoping and the supplier's production timescales. As such, this feature will be deployed by early 2025 at the latest.</p>
20	<p>A mystery shopper in the RiDC research suggested that they did not want to have to create an account to use the service and felt this could deter some passengers from proceeding with a complaint. Introducing a 'continue as guest' option may be preferable for some users.</p>	<p>Consider if the portal can accommodate users without the need to create an account.</p>	<p>The Rail Ombudsman is very mindful of digital exclusion and a range of contact channels mean there is no requirement for a service user to engage with the online portal at all, if they do not wish to or are unable to.</p> <p>We receive postal applications (and we send out blank application forms via post on request) and we can take an application directly via our accessible contact channels, such as telephone or BSL. It is therefore important to view the perceived deterrence of needing to</p>

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			<p>register an account in the context of the service which only offers online services to those who wish to use them.</p> <p>For those who wish to submit an application online but without creating an account (which only requires basic details and no supplementary monitoring information), this can be done without use of the portal by downloading an application form, completing it and returning it via email.</p> <p>Nonetheless, a ‘continue as guest’ type option could be developed at further cost, but any users who did so would then lose the benefits of using the online portal, which includes direct messaging, secure document exchange and the ability to view the status of a case. We propose to engage our Advisory Panels and ORR on the proposal this Autumn; exploring the evidence base and the potential benefit against cost of development would seem key to next steps.</p>
21	<p>The Trajectory research into disabled passengers’ experiences of complaints handling suggested that more could be done to raise awareness about how to make complaints. One idea suggested was targeted awareness raising via disability representative organisations such as the Royal National Institute of Blind People or Disability Rights UK or other organisations that have</p>	<p>Targeted awareness raising to promote the Rail Ombudsman service e.g. via disability organisations, charities and forums.</p>	<p>The Rail Ombudsman welcomes the opportunity to enhance its role in improving disabled passengers’ experiences of the complaint landscape. We work closely with a range of disability representative organisations – including both of those named in the research finding – and will embrace further engagement with the sector.</p> <p>We are aware of the valuable role disability organisations play in supporting disabled people through signposting especially; this has been demonstrated on several occasions to date. We are also aware of the vital role these organisations play in appropriately conveying the steps to be taken by potential complainants to exhaust a Rail Operator’s complaints process before escalating to the Rail Ombudsman. This helps to manage user expectations and avoid undue friction/back-and-forth in the complaint process. Our recognition of</p>

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	<p>relevant information, signposting, and advisory functions.</p>		<p>the role these organisations play, and their ability to keep the Rail Ombudsman delivering for disabled people, is reflected in the composition of our Passenger Advisory Panel, which includes Disability Rights UK and Level Playing Field, along with other stakeholders with exposure to disability/accessibility issues through their work.</p> <p>The Rail Ombudsman is an active participant in relevant engagement opportunities. We recently attended a roundtable (also attended by ORR, Transport Focus / London TravelWatch, operators and a range of other stakeholders including Disability Rights UK) to explore awareness of the complaints landscape for users requiring additional support. Awareness is multi-faceted; we played a prominent role in the ‘Getting To The Match’ initiative in collaboration with Level Playing Field, and other stakeholders, to support disabled sports fans using public transport. This has been a valuable opportunity to foster relationships with key disability landscape stakeholders, helping to inform and reassure them about the support the Rail Ombudsman can provide to their service users. We also work closely with Citizens Advice: an important port of call for people requiring assistance in complaints landscapes whether disabled or not.</p> <p>We propose to continue to embrace opportunities and will actively seek to extend our reach and the frequency of engagement to create new collaborations to support information, signposting and advisory functions across relevant organisations. We will update ORR on this activity through our periodic service review meetings and furthermore would welcome any opportunities to collaborate with ORR and the industry on disabled passenger awareness of complaints processes in the wider sense.</p>