

Complaints handling and delay compensation: Operator performance and continuous improvement actions 2024-2025

An assessment of operators' performance for 2024-2025.

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1. Executive summary

1.1 Where things go wrong, we want passengers to feel confident that they can easily complain to train operators and that their complaints will lead to improved services. Passengers are entitled to compensation from train operators if they are delayed beyond certain thresholds (known as 'Delay Repay'). ORR set out the minimum standards expected of train operators in its Complaints Code of Practice and Delay Compensation Code of Practice.

1.2 In 2024-2025 there were no widespread concerns about processing times. Overall, 97.1% of complaints and 99.1% of delay compensation claims were closed within the regulatory requirement of 20 working days. The approval rate for delay compensation claims was 81.6%.

1.3 According to ORR's Passenger satisfaction with complaints handling survey, only 31% of respondent in 2024-2025 were satisfied with how their complaints was handled. This is too low when compared to other sectors and we expect operators to improve complaint handling quality

going forwards.

1.4 Positive areas from operators' continuous improvement reports for 2024-2025 include:

- Using complaints data to report key issues facing passengers and applying learning to make targeted improvements within their business.
- Positive steps taken by operators to examine the experience of disabled people using the complaints process and make improvements to remove barriers.
- Making improvements to the claim process through automation and more stringent quality checks.

1.5 Areas from operators' continuous improvement reports for 2024-2025 that need further work include:

- Assessing the experience of passengers accessing and using the complaints process.
- Measuring the impact of improvement actions.
- Adopting innovative approaches to raising awareness of the delay compensation process.

2. Complaints handling

Introduction

2.1 Where things go wrong, we want passengers to feel confident that they can easily complain to train and station operators and that their complaints will be addressed. We want operators to use learnings from all complaints to drive continuous improvement in passengers' experiences of rail.

2.2 All operators must comply with ORR's complaints code of practice (CoP). The CoP defines core minimum requirements that all licence holders must deliver through their Complaints Handling Procedures (CHP). The CoP also draws attention to wider good practice principles that licence holders should consider.

2.3 We monitor train operators' performance to ensure that complaints are handled in line with the requirements of the CoP. To achieve this, we:

- Review data that train operators must report monthly to ORR including the volume of closed complains, the timeliness of responses and complaint categories, among other key metrics.

- Host an ongoing, large-scale complaint handling satisfaction survey with rail passengers who have been through the complaints process.
- Require annual reports from operators on their continuous improvement activities covering the previous year.

2.4 This report summarises industry level performance with complaints as established during our monitoring in 2024-2025 (throughout the document, data is from 1 April 2024 to 31 March 2025), to highlight good practice and areas that require more focus by operators.

Complaint volumes, timeliness of responses and categories

2.5 There were 322,409 complaints closed by train operators in 2024-2025 which is a decrease of 8% from 2023-2024. Over the same period, there was a 7% increase in journeys made by rail passengers, to 1,730 million journeys.

2.6 Overall, 97.1% of complaints were closed within the regulatory requirement of 20 working days.

2.7 Punctuality / reliability was the most common cause of complaint in 2024-2025, accounting for 19.3% of all complaints, a 0.3pp decrease from 2023-2024.

2.8 Other common complaints themes included sufficient room to sit or stand, facilities on board trains, ticketing and refunds policies, and compensation claims processes.

2.9 More detailed information, including the performance of individual train companies, can be found on ORR's online data portal: [Passenger rail service complaints](#).

Complaints handling satisfaction

2.10 In 2024-2025, ORR's complaints satisfaction survey received over 23,000 responses.

2.11 Overall, 31% of respondents were satisfied with how the train operator handled their complaint in the latest year. This was up 2.9 percentage points (pp) compared with the previous year (a statistically significant change). Satisfaction with the complaint outcome was 29%, which was up 1.4pp compared with the previous year (a statistically significant change).

2.12 Passengers were most satisfied with operator politeness (68%) and ease of making a complaint (58%).

2.13 Passengers were least satisfied with the extent to which the operator seemed keen to reach an agreeable outcome (27%) and complaints being fully addressed (28%).

2.14 More detailed information, including the performance of individual train companies, can be found on ORR's online data portal: Passenger satisfaction (complaints handling).

Complaints handling continuous improvement

2.15 The CoP requires operators to submit continuous improvement reports to ORR and publish them on their websites annually.

2.16 The CoP sets out that the reports should:

- Assess the passenger experience of accessing and using the complaints process and describe any improvements made.
- Report the key issues that passengers have complained about.
- Demonstrate how licence holders have actively used and applied learning from complaints within their business.
- Describe the impact of improvement activities.

2.17 Starting in 2024-2025 we have also asked operators to describe how experiences of disabled people accessing the complaints process have been improved.

Improvements for passengers introduced in 2024-2025

2.18 Most operators demonstrated using applied learning from the most common types of complaints within their business. Some examples include:

2.19 Punctuality / reliability

- Operators working with Network Rail to improve incident management and develop plans for responding to weather events.
- Improved communications with passengers via service disruption emails, social media and improved websites.

2.20 Sufficient room to sit or stand

- Operators introducing more peak time services and additional capacity to meet demand

and ensure passengers have more room on board.

2.21 Facilities on board

- Investment in new fleet with facilities based on passenger feedback including more luggage space, better mobile phone signal and better passenger information screens.

2.22 Ticketing and refunds policies

- Improvements to online ticketing information and improved ticket vending machine availability.

How experiences of disabled people accessing the complaints process have been improved

2.23 In April 2024 we published a report on Disabled passengers' experiences of complaints handling by train operators. Two of the key findings in this report were:

- Operators' complaints processes are broadly accessible to most disabled passengers, but not all.
- Disabled passengers would be more likely to complain if they felt it was a worthwhile use of their time and energy and would lead to change.

2.24 Our Experiences of Passenger Assist report 2024 to 2025 corroborates that disabled and older passengers are not likely to complain, even if they have a poor experience. Of the respondents who reported dissatisfaction with the assistance to travel received from an operator in 2024-2025, 66% stated they did not raise a complaint. Of these, the most common reason given was that respondents could not see a benefit to raising a complaint (41%).

2.25 We requested operators consider disabled passengers' experiences in their continuous improvement reports, voluntarily in 2023-2024 but as a requirement from 2024-2025 going forward. Operators should retain focus and momentum with actions designed to make the complaints process accessible and effective for disabled people.

2.26 In 2024-2025, most operators fulfilled the requirement to describe action taken to improve the experience of disabled passengers when accessing the complaints process.

2.27 Some good practice examples that ORR encourage to be rolled out more widely include:

- Examining the top complaint categories associated with accessibility, including passenger assistance, to establish any recurring issues.
- Setting up specialised teams to handle complaints about passenger assistance.
- Collecting information on passengers' requirements/preferences in handling their complaint.
- Improving access and ways to communicate complaints, for example accessible webforms and use of accessibility services like SignLive and Aira. In addition, providing an Easy Read version of guidance on making a complaint.

2.28 Earlier this year, we published a short follow-up to our report on Disabled passengers' experiences of complaints handling by train operators. This update summarised the actions taken and examples of good practice implemented by the five underperforming operators we engaged with.

2.29 We welcomed the positive steps taken by these operators and strongly advised wider adoption of these practices across the rail industry.

2.30 Analysis of the continuous improvement reports indicates that several operators have adopted, or are beginning to adopt, these good practice measures.

Feedback for operators on complaints handling continuous improvement

2.31 More than half the operators did not adequately describe how they assess the passenger experience of accessing and using the complaints process. Therefore, descriptions of any improvements made to the complaints process and their impact were also lacking.

2.32 For the 2025-2026 continuous improvement reports we expect operators to:

- Provide more detail on how they assess passenger experience of the complaints process and what actions were taken to secure improvements throughout the year. This relates to all passengers who use the complaints process.
- Place more focus on measuring the impact of improvement actions and provide more detail on what the impacts are, particularly in relation to the complaints process.
- Assess ORRs complaints satisfaction survey data to inform what is done well and what needs to be improved. We will continue to monitor the results of the complaints satisfaction survey and may engage with individual operators if we identify sustained poor performance in any aspect of the complaints handling process.

- Continue improving accessibility and deepen their understanding of disabled passengers' experience within complaints handling. In practice, this requires the capability to analyse complaints data relating to assistance, identify areas for improvement, and ensure that insights are fed back to relevant teams to drive continuous improvement for disabled people.

3. Delay compensation

Introduction

3.1 Passengers are entitled to compensation from train companies when they are delayed beyond certain thresholds (typically referred to as 'Delay Repay').

3.2 All operators must comply with ORR's Delay Compensation Code of Practice (CoP). The CoP is designed to establish a common level of good practice and, beyond that, improve passengers' access to the delay compensation to which they are entitled, through measures that will raise awareness and improve processes.

3.3 We monitor train companies' performance to ensure that passengers benefit from the standards established by the CoP. To achieve this, we do the following:

- train companies must report monthly to ORR the volume of delay compensation claims they have received and closed, the timeliness of responses and the approval rate, among other key metrics.
- require annual reports from operators on their continuous improvement activities covering the previous year consisting of steps taken to improve passenger awareness of delay compensation and improvements to the claim process.

3.4 This note summarises industry level performance with delay compensation as established during our monitoring in 2024-2025, to highlight good practice and areas that require more focus by operators.

3.5 The report for delay compensation performance for 2023-2024 can be found on our website: [Report on continuous improvement in the provision of delay compensation 2023-2024](#).

Delay compensation claim volumes, timeliness and approval rate

3.6 There were 8.3 million delay compensation claims closed by train operators in 2024-2025, an increase of 9% on the previous year.

3.7 There were 46,329 complaints closed by train operators on delay compensation in 2024-25, an increase of 3.6% on the previous year.

3.8 The time taken for passengers to receive a decision about their claim has reduced and the proportion approved claims has increased. Overall, in 2024-2025, 99.1% of delay compensation claims were closed within 20 working days. This was an increase of 0.1 percentage points (pp) from the previous year. Overall, 81.6% of claims closed were approved (an increase of 1.1pp from the previous year)

3.9 The proportion of all rail complaints that are about delay compensation has increased. In 2024-2025, complaints about delay compensation made up 12.7% of all rail complaints. This was an increase of 1.4pp from the previous year. The compensation claims process was the most common subject of complaint about delay compensation, making up 4.5% of all rail complaints. This was an increase of 1.1pp from the previous year.

3.10 More detailed information, including on the performance of individual train companies, can be found on ORR's online data portal: Delay compensation claims - ORR Data Portal.

Delay compensation continuous improvement

3.11 Our assessment of overall operator performance against the requirements for the 2024-2025 delay compensation continuous improvement reports is outlined below.

Improvements to delay compensation for passengers introduced in 2024-2025

3.12 Most operators included steps taken to increase passenger awareness of the claims process. Examples include

- More announcements at stations and on board.
- Improved communications about delay compensation during and after disruption.
- Key messaging about delay compensation integrated into daily staff briefings.
- Updated webpages with clearer information on delay compensation.
- Better use of messaging about delay compensation on station posters.

3.13 Regarding the compensation delay process, most operators focused on three main themes with their improvement actions:

- How to make the claims process simpler and more accessible for passengers.
- Automation to make decisions and payments quicker.
- Improved quality checks to ensure the correct outcomes.

Feedback for operators on delay compensation continuous improvement

3.14 We are encouraged by the steps operators have taken to improve the delay compensation process itself, particularly in making claims more straightforward and responsive. However, we note that the continuous improvement reports did not show strong evidence of innovative approaches to raising passenger awareness.

3.15 Going forward, operators should explore a broader range of methods to reach all passenger groups, ensuring that key messaging is clear, inclusive and accessible, with minimal barriers that might deter eligible passengers from making a claim.

3.16 The volume of complaints made about the claims process should be a concern to operators. We expect such complaints are used to identify recurring issues that operators then address and prevent from happening again.

4. Conclusions

4.1 In 2024-2025 ORR did not identify any widespread concerns with complaints or delay compensation processing at an industry level. However, according to our survey, satisfaction with complaints handling is too low and we expect operators to take steps to address this.

4.2 The complaints continuous improvement reports demonstrated some good practice but there are areas that operators need to focus on and demonstrate in more detail next year, including assessments of the experiences of the complaints process and describing the impact of improvements. These requirements underpin a continuous improvement culture.

4.3 In general, operators should present the complaints continuous improvements reports with a wider scope than just the five most complained about issues. Based on the results of ORR's complaints satisfaction survey, the complaints process itself has room for improvement and the continuous improvement reports are the appropriate place for operators to showcase the work

that has been done in this area throughout the year.

4.4 In relation to delay compensation operators should focus on raising awareness of the scheme in innovative ways to maximise the number of passengers who know they can claim for delays.

4.5 In terms of processing claims, operators should identify and address recurring issues that are driving passenger complaints and continue to develop ways to process claims efficiently and effectively using automation where appropriate alongside robust quality checks.

5. Next Steps

5.1 Operators should reflect on the findings in this report and refer to the feedback when planning for continuous improvement activity throughout the year.

5.2 ORR will continue to monitor operator performance across complaints handling and delay compensation and where concerns arise, will engage with operators.

5.3 Should operators become aware of any issues that are likely to impact performance in either complaints handling or delay compensation, we strongly encourage them to flag these to us early.

5.4 Equally if an operator makes any changes to either process that results in notable benefits, they should share this good practice more widely, including with ORR.