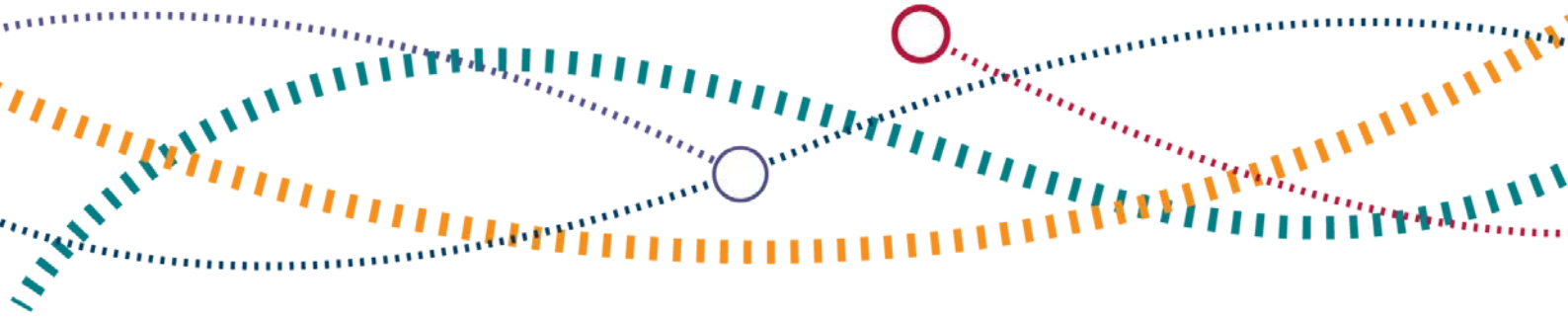
Reference guide for ORR Core Data compliance reporting – Version for station only operators or non-scheduled passenger services

2021-22

06 April 2021



Contents

1. Introduction 3
2. Complaint definition 4
3. Section B - complaints 7
4. Section A – complaint categories 12
5. Section D – booked and unbooked assistance 14
6. Section E – continuous improvement with complaints 18
7. Sending the data to ORR 20

Annex 1: Summary of Core Data requirements 21

Annex 2: Periodic quality assurance checks 24

Annex 3: ORR guidance for categorising Covid-19 related complaints. 25

1. Introduction

Purpose of the document

This guidance has been produced to support station only or non-scheduled passenger services with submitting the Core Data reporting template. This refers to those licensees that were the subject of our Licence Outliers consultation process and at the conclusion of which were deemed to be within scope of regulation and required to supply ORR with ongoing compliance monitoring Core Data. This document effectively sets out what data they are required to provide and the technical guidance on how to collect the data and the frequency with which it should be reported.

A summary of the Core Data requirements for station only or non-scheduled passenger services can be found in annex 1 of this document.

The ORR licence conditions can be found on the licensing section of the ORR website.

Reporting template

The Core Data reporting template for station only or non-scheduled passenger services is located on our Core Data section of the ORR website (please see the related files section at the bottom).

Training or refresher in data submission

If you are new to reporting, or require a refresher in any reporting sections, please email rail.stats@orr.gov.uk and we will be happy to provide support.

Questions or feedback

For any questions or feedback please email rail.stats@orr.gov.uk.

2. Complaint definition

What should count as a complaint

The following section, as well as section A and B, supplements the licence guidance on complaints handling procedures.

The following section defines what should count as a complaint. The complaint definition is used for reporting in both section A and B.

The complaints handling guidance (section 2.7 to 2.11) defines a complaint as:

> **2.7 For the purposes of these guidelines a complaint is defined as:**
>
> **"Any expression of dissatisfaction by a complainant or potential complainant about service delivery or company or industry policy"**

The following contact methods for complaints are currently collected in section A and B.

Complaint contact methods

Contact method	Scope
Letter (including comment cards)	In scope
Email/Webform	In scope
Telephone call	In scope
Meet the manager	In scope
Online forums (including live chat)	In scope

Meet the manager and online forums

ORR recognise that *meet the manager* and online forums generate lots of customer feedback. In order for the feedback to count as a complaint the feedback should lend itself to investigation e.g. the complainant has expressed dissatisfaction about a specific aspect(s) of service. The licence holder should then assist the complainant in making a

formal complaint, which will then be dealt with in accordance with the licence holder's Complaints Handling Procedures.

Live chat

Live chat is increasingly being used by Operators to interact with passengers. While many of the comments may be classified as general feedback or enquiries, the same approach listed for meet the manager and online forums above should be used to determine if correspondence needs to be escalated as a formal complaint.

Telephone complaints

All telephone complaints should be recorded. If a complaint is made without the person leaving their details, this should still be captured as a complaint within sections A and B.

What should not count as a complaint

The following criteria should **not** be counted as a complaint within section A and B.

What should not be counted as a complaint

Contact method	Scope
Another operator's complaint	Out of scope
Delay compensation claim	Out of scope (unless a complaint, see note below)
Feedback	Out of scope (see note below)
National Rail Enquiries	Out of scope
Praise	Out of scope (see section B for further information)
Social media	Out of scope (see note below)
Transport Focus/London TravelWatch	Out of scope

Another Operator's complaint

Complaints which relate to another Operator (these are sometimes referred to as 'OTOC complaints' should **not** be included within the complaint statistics. A complaint about a specific train, staff member, ticket office or station shall be owned by the licence holder responsible for that train, staff member, ticket office or station. A complaint about a delay

will be owned by the licence holder on whose train the passenger was travelling on, or supposed to be travelling on, when the delay occurred (see section 2.13 of the complaints handling procedure guidance).

Delay compensation claims

Data regarding delay compensation claims (e.g. Delay Repay) should not be included in the complaints data. A standard delay compensation claim is not a complaint.

However, complaints about these delay compensation schemes, claims or claims processes **should** be included in the complaints data.

Feedback

Feedback can take the form of comments which are neutral, positive or negative. Feedback comments should **not** be included unless they are classified as a complaint. Operators should have mechanisms by which such communication can be identified and dealt with appropriately. These mechanisms will be detailed in the Operator's complaints handling procedure (see section 2.9 – 2.10 of the complaints handling procedure guidance).

National Rail Enquiries Service (NRES)

Complaints about NRES should **not** be recorded within the ORR complaints data. Such complaints should be referred to National Rail Enquiries.

Social media

Comments received through social media should **not** be included in the complaints data. However, there may be circumstances in which the feedback on social media lends itself to further investigation. The licence holder should assist the complainant in making a formal complaint which will then be dealt with in accordance with the licence holder's Complaints Handling Procedures (CHP). For example, this may involve signposting the complainant to a webform or providing an email address at which they can log formal complaints.

3. Section B - complaints

This section records complaint volumes and response times to those complaints. Section B fulfils station only or non-scheduled passenger services CHP indictor 1, and 2.

Section B has deliberately been placed before section A since correct understanding of how to report section B is required first in order to complete section A.

Total number of complaints closed (row 7)

Metric	Contact method	P1	P2	P3
Total number of complaints closed				

The methodology for reporting complaint volumes is set out below.

Based on complaints closed

Complaint volumes are based on the number of complaints **closed** within a period (as opposed to complaints received). Once this data has been submitted to ORR it should remain fixed, with no further changes required. Please see the previous section for definition of a complaint.

Based on first full substantive response only

Complaint volumes are based on complaints which have had a first full substantive response only. A first full substantive response is defined as:

> The rail company's first substantive response which in its view, reasonably provides a full response to the consumer's complaint. This does not include an acknowledgement or holding response.

Correspondence following the first full substantive response

Any responses following the first full substantive response regarding the same complaint should not be reported within this section (row 7).

For example, if the complainant is not satisfied with how the complaint has been handled or with the outcome and this results in a 'comeback' which leads the Operator to re-open the complaint, this will **not** count as an additional complaint volume for this part of the report.

It is only in circumstances where the complainant makes a **new complaint** (i.e. materially distinct from the original complaint) that it should be categorised as a new complaint in section B.

Reporting example for a complaint 'comeback'

In this example the original complaint was about the attitude of staff at station X. If the Operator has sent a first full substantive response but the passenger then comes back and complains that on a different day staff at station Y were also unhelpful, then this should be recorded as a **new complaint** in section B with the subject of the new complaint also logged in section A.

In contrast, the comeback would be considered '**related'** to the original complaint if it was expressing the complainant's dissatisfaction about how long it took for them to receive a response to the original complaint. This would mean the complaint is re-opened but the additional complaint about the response time would only be recorded in section A, with no additions made to section B.

Multiple complaint types in one correspondence

If there are multiple complaint types within a single complaint correspondence, this should be recorded once within section B (row 7). This is because section B records the number of complaint correspondence closed. Please note, within section A, each complaint type is recorded separately (see section A).

For example, if a complaint correspondence contains a complaint on both the punctuality of the journey and on accessibility issues, this will be counted as one complaint within section B.

Response times to complaints (row 6)

Metric	Contact method	P1	P2	P3
Percentage of complaints responded to within 20 working days	All contact methods (%)			

The methodology for reporting response times to complaints is outlined below.

Response times are based on complaints closed

Response time to complaints are based on those **complaints closed** during the period (as reported in the complaint volumes section – row 7). For example, if 100 complaints were reported as closed for the number of complaint correspondence section, then the response time calculation would be based on those 100 complaints.

Calculating response time

The response time is based on when the complaint was first received by the Operator to when the Operator issued the first full substantive response.

Received is defined as the first working day the Operator received the complaint. Please note, this is **not** when the Operator first uploads the complaint to a complaints management system.

The first full substantive response is defined within the 'number of complaint correspondence' section previously.

Response times are based on working days

The number of days to answer a complaint is to be reported in working days only, and therefore excludes weekends and bank holidays.

Correspondence following the first full substantive response

Further correspondence with the complainant following the first full substantive response should **not** be counted as part of the response time. Response times to complaints should reflect the first full substantive response only.

As noted previously (see 'correspondence following the first full substantive response'), if the complainant makes a new complaint, then it should be categorised as a new complaint with its own response time.

Data format for response times

The percentage of complaints responded to should be provided to at least two decimal places.

Response time summary

Correct way of reporting response times	Incorrect reporting of response times
The received date of a complaint is defined as the first working day the TOC received the complaint, as opposed to the complaint being uploaded to a complaints management system. The report should be reported as closed once the first full substantive response is issued.	Reporting each response time associated with the complaint separately. E.g. one set of response times for the first substantive response, and adding on separate responses following the first full substantive response.

Response times reporting example

The Operator received a complaint and made a first full substantive response on the 15th working day. The complaint is re-opened and takes a further 10 working days to issue another response. The first full substantive response of 15 days is included only within the response time. The complaint will be recorded in section B in the following way:

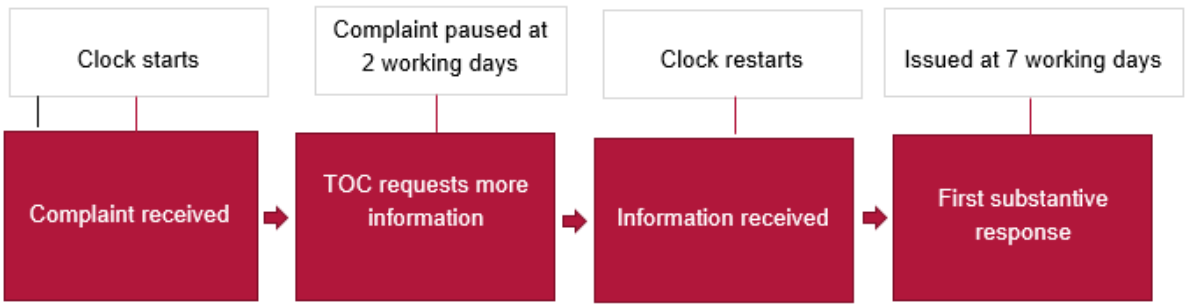
Metric	Contact method	P1
Percentage of complaints responded to within 20 working days	All contact methods (%)	100.00%
Total number of complaints closed		**1**

Putting the complaint on hold while waiting for the complainant to respond

The process of putting a complaint on hold while waiting for the complainant to respond, or provide additional information, is known as 'stop the clock'. There have been discussions between ORR and Operators about removing the 'stop the clock' mechanism when calculating complaint response times. ORR **will not** proceed with this change for 2021-22 and will alternatively consider consulting on its removal in tandem with a broader package of changes via the CHP guidance review in 2021.

The complaint response time can be paused if the Operator is waiting for the complainant to reply e.g. to provide the Operator with more information to enable the complaint to be investigated (see flow diagram below).

If the complainant does not respond, then the complaint can be closed at the date when the Operator replied asking for more information. To that end, Operators should therefore make it clear to the complainant the timeframe within which they would expect the complainant to respond by.



Response time is calculated in the following way:

A: From the date the complaint was received to the date the Operator asked for more information required to fully respond to the complaint = 2 working days.

B: From the date the Operator received the requested information from the complainant to replying with the first full substantive response = 5 working days.

Response would be calculated as: A + B

2 + 5 = **7 working days in total**

This would count as one complaint.

Reporting timescales

To be submitted bi-annually with P7 and P13 data

4. Section A – complaint categories

This section categorises the type of complaints which were closed in section B. This fulfils station only or non-scheduled passenger services CHP indictors 3 and 4, as well as ATP indicator 8.

Level 1 Category	Level 2 Category	P1	P2
All Contact Methods	Accessibility issues		
All Contact Methods	Complaints handling		
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			

Complaints on accessibility issues and complaints handling must be reported

Operators should submit their own complaint categories below

Categorisation of complaints

Each cause for a complainant's expression of dissatisfaction (complaint type) within a complaint correspondence should be recorded in section A.

Reporting example

If a complaint correspondence contains two type of complaint categories, such as one on complaints handling and one on accessibility issues, then this will be recorded twice within section A. Once under complaints handling, and once under accessibility issues (in contrast this will be recorded as one complaint in section B).

Level 1 Category	Level 2 Category	P1
All Contact Methods	Accessibility issues	1
All Contact Methods	Complaints handling	1

Mandatory complaint categories

There are two mandatory categories that must be submitted. These categories are **accessibility issues** and **complaints handling** and for this reason have already been self-populated within the template.

Inserting your own complaint categories

In order to reduce the burden on licence holders the remaining complaint categories will be collected based on the licensee's own categories. The license holder should populate the rest of the section A table with their own complaint categories.

Complaints that have been re-opened

If the complainant is not satisfied with how the complaint has been handled or with the outcome, then the complaint may be re-opened and the Operator may send another response. When the Operator responds with the next substantive response, the complaint type(s) will be categorised in section A in the period the Operator sent the next substantive response.

Please note, the re-opened complaint will **not** count as a complaint volume in section B (see section B for guidance).

Difference between sections A and B

The total number of complaints in Section A will be higher than or equal to section B. This is because each complaint recorded in section B should be classified at least once within section A.

Complaints mapping table

Within the data template there is a complaints mapping table sheet. This gives examples and guidance for the complaint categories that ORR currently publish for mainline operators. Please feel free to look at these categories and adapt them to your reporting if helpful.

During 2020-21 ORR issued guidance on how to categorise Covid-19 type complaints. This guidance can be found in annex 3 of this document and within the complaints mapping document for 2021-22 reporting.

Reporting timescales

To be submitted bi-annually with P7 and P13 data.

5. Section D – booked and unbooked assistance

This section records the detail on both booked and unbooked assisted journeys. It fulfils station only or non-scheduled passenger services ATP indicator 7.

Booked assistance (rows 6 to 13)

This section explains how to complete the booked assistance section of the data template. It covers booked assistance completions volumes, incomplete booked assistance volumes and reasons for the incomplete assistance.

Metric reference	Type	Metric	P1
A	Booked	A). Volume of booked assistance	
B	Booked	B). Volume of booked assistance completions	
C	Booked	C). Volume of booked assistance incomplete, and reasons for each incomplete assistance (below)	0
Ci	Booked	i). No space on train	
Cii	Booked	II). No staff available	
Ciii	Booked	iii). Disruption	
Civ	Booked	iv). Passenger did not arrive / arrived too late for service	
Cv	Booked	v). Other	

A). Volume of booked assistance (row 6)

This is the volume of booked assistance requested. This figure will be the sum of both metric B – volume of booked assistance completions (row 7) and metric C – volume of booked assistance incomplete. For example, if there were 20 booked assistance completions, and 5 booked assistance which were incomplete, then the total for metric A would be 25 volume of booked assistance.

B). Volume of booked assistance completions (row 7)

The number of booked assists made via Passenger Assist actually completed by the Operator within the specified period. This is a single figure for the Operator, i.e. an aggregate of all booked assists delivered successfully by the Operator across all its services within the specified period (including both trains services and its managed stations).

C). Volume of booked assistance incomplete, and reasons for each incomplete assistance (below) (row 8-13)

If a booked assistance request has been logged in Passenger Assist and the assist has **not been provided** to the passenger this must be recorded as an 'incomplete' and the reason for the failure should be categorised as follows:

i. No space on train
ii. No staff available
iii. Disruption
iv. Passenger did not arrive / arrived too late for service
v. Other

Reasons for each incomplete booked assistance (row 9 to 13) should sum up to the volume of booked assistance incomplete (row 8). If this does not match (for example an assistance has more than one failure reason), please provide information in the commentary box.

Unbooked assistance (rows 14 to 21)

This section explains how to complete the unbooked (Turn Up and Go) assistance section of the data template.

D	Unbooked	D). Volume of unbooked assistance (Turn Up and Go) requested	
E	Unbooked	E). Volume of unbooked assistance (Turn Up and Go) completed	
F	Unbooked	F). Volume of unbooked assistance (Turn Up and Go) incomplete, and reasons for each incomplete assistance (below)	0
Fi	Unbooked	i). No space on train	
Fii	Unbooked	II). No staff available	
Fiii	Unbooked	iii). Disruption	
Fiv	Unbooked	iv). Passenger arrived too late for service	
Fv	Unbooked	v). Other	

D). Volume of unbooked assistance (Turn Up and Go) requested (row 14)

The volume of unbooked assistance requests received by the Operator from passengers within the specified period. The volume of unbooked assistance should equal the volume completed (item E) plus the volume incomplete (item F).

This is a single figure for the Operator and we do not require this to be reported at station level.

E). Volume of unbooked assistance (Turn Up and Go) completed (row 15)

The volume of unbooked assists actually carried out by the Operator within the specified period.

This is a single figure for the Operator and we do not require this to be reported at station level.

F). Volume of unbooked assistance (Turn Up and Go) incomplete, and reasons for each incomplete assistance (rows 16-21)

This is the volume of unbooked assists that were requested by passengers but were unable to be fulfilled by the Operator, broken down by the reason for each incomplete assistance as categorised as follows:

i. No space on train
ii. No staff available
iii. Disruption
iv. Passenger arrived too late for service
v. Other

The volume of unbooked assistance requested (row 14) should sum to the volume of unbooked assistance completed (row 15) plus the volume of unbooked assistance incomplete (row 16).

Commentary

If the assists you have provided relate to a sample of stations, (eg if four stations are logging this data), please indicate the stations within the commentary box from row 25.

Please also provide any data caveats or limitations that ORR should be aware off.

Reporting timescales

To be submitted bi-annually with P7 and P13 data.

6. Section E – continuous improvement with complaints

This section records the top five key areas passengers have complained about, and what the Operator is doing to address those issues. This fulfils station only or non-scheduled passenger services CHP indicator 5.

Continuous improvement in complaints handling

Number	Complaint category	P1-P13 volumes	Commentary
Example	Example of complaint topic: e.g. Provision of information on website or mobile apps	Section A complaint volumes for each category	Example: TOCs should provide some commentary as to what is driving the volumes of complaints in this category and explain clearly what actions they have made to address them, and what effect that has had. E.g. 'in May 2017 we noted an increase in the volume of complaints regarding the quality of information on our website and mobile apps. We brought in a specialist team to examine these issues and we made changes to our information channels which have had the following effect....'.

Operators to provide detail on the following question:

"What are the top five key areas passengers have complained about in the past year and what action are you taking to address them?"

By 'key areas' we mean service issues clearly within the Operator's area of responsibility (i.e. not issues clearly caused by another Operator or a third party beyond your control, such as Network Rail).

P1-13 volumes

The complaint categories and annual volumes of complaints should be taken from section A.

Commentary

In the commentary box Operators should include narrative on both successes and failures. ORR recognises that most complainant service improvements are achieved through learning from trial and error and so we are keen to hear of the actions Operators have been taking to seek improvements in complaint handling regardless of whether they delivered the desired outcomes.

Please include:

1. Information that is easily understandable and brief.

2. Show what the problem was, how the Operator addressed the problem, and what impact this had.
3. We assume these will be top 5 areas by volume (in the Operator's control) and will match the volumes in Section A of the template.

Example:

Ticket buying facilities – Smartcards

The top complaint category in the past year related to complaints about the use of our newly launched Smartcard, with some passengers finding it difficult to find information about how to use the 'top up' function. In P8 the smartcard website area was improved to help passengers understand the Smartcard and how it works: for example, an overview, 'user guide', and improved FAQs were added. By P9 we noted a significant drop in the volume of complaints about this issue leading us to believe it has been remedied by our actions.

Complaints outside the Operator's control

Complaints about delays to services caused by Network Rail engineering works, or issues directly related to the actions of another TOC, are reasonably beyond the Operator's control and so should be excluded from being reported under this indicator.

Delays or other types of service failure caused by factors largely attributable to the actions of the Operator (e.g. train faults, staff shortages, etc.) should be reported under this indicator. Operators should examine their own complaint topics during 2021-22 and consider which should be reported to ORR under this section.

Reporting timescales

To be submitted annually with the P13 submission.

7. Sending the data to ORR

Please submit data in the excel template provided to rail.stats@orr.gov.uk at most fifteen working days after rail periods 7 and 13.

It is essential that the template is used and no modifications are made to it as the data is uploaded directly to our data warehouse and any changes to the format of the template will result in an error when it is uploaded.

We accept revised data for previous periods and will refresh the time series with any new data received. It would be helpful if Operators could indicate in their covering email if any data have been revised and any reasons for the revision.

A copy of the template can be downloaded from the related documents box on our Core complaints data webpage.

Railway period dates and submission dates

The railway period dates and submission dates can be found within the coversheet of the reporting template.

Commentary on trends

We welcome any comments you have which describes changes in your complaints data. For example, if the complaints rate has increased or decreased, any impact on percentage of complaints responded to, and type of complaint. Please provide comments within the commentary box within the data template.

Quality assurance checks

ORR carry out periodic quality assurance checks on all data received. We will contact Operators if we find any potential issues. We have listed our checks in annex 2, Operators should build these checks into your own reporting schedule in order to reduce ORR contacting you with any potential data issues following submission.

Annex 1: Summary of Core Data requirements for station only or non-scheduled passenger services

CHP indictors:

Indicators	Reporting frequency	Sheet name in template (if applicable)
1. Total number of complaints closed	Bi-annual (with P7 and P13 data)	Section B
2. Percentage of complaint cases responded to within specified targets	Bi-annual (with P7 and P13 data)	Section B
3. Total number of complaints received by complaint category	Bi-annual (with P7 and P13 data)	Section A
4. Complaints about the complaint handling process	Bi-annual (with P7 and P13 data)	Section A
5. Measuring continuous improvement in complaint handling	Annual	Section E

ATP indictors:

Indicators	Reporting frequency	Sheet name in template (if applicable)
6. Staff who have received relevant disability awareness training or disability equality training DISCONTINUED: No longer collected for Core Data from 2020-21.	N/A	Section F
7. Assisted travel - sub categories (a) to (f) a). Volume of booked assistance b). Volume of booked assistance completions c). Volume of booked assistance incomplete, and reasons for each incomplete assistance i). No space on train II). No staff available iii). Disruption iv). Passenger did not arrive/ arrived too late for service v). Other d). Volume of unbooked assistance (Turn Up and Go) requested e). Volume of unbooked assistance (Turn Up and Go) completed f). Volume of unbooked assistance (Turn Up and Go) incomplete, and reasons for each incomplete assistance (below) i). No space on train II). No staff available iii). Disruption iv). Passenger arrived too late for service v). Other	Bi-annual (with P7 and P13 data)	Section D
8. Volume of accessibility related complaints	Bi-annual (with P7	Section A

Indicators	Reporting frequency	Sheet name in template (if applicable)
	and P13 data)	

Annex 2: Periodic quality assurance checks

Below are the quality assurance checks ORR carry out on Operators data every period. Please ensure you have checked your data against these checks prior to submission to ORR. This should reduce the number of data errors identified by ORR, and therefore re-submissions required by Operators.

Section B

B1). Total number of complaints closed (row 7) must be less than or equal to tab Section A Grand total;

B2). Percentage of complaints responded to within 20 working days' (row 6) and total number of complaints closed (row 7) should not change throughout the year (since they are based on complaints closed). Any revisions must be explained during your submission;

Section D

D1). Reasons for each incomplete booked assistance (row 9 to 13) should sum up to the volume of booked assistance incomplete (row 8). If this does not match (for example an assistance has more than one failure reason), please provide information in the commentary box;

D2). Reasons for each unbooked assistance (row 17 to 21) should sum up to the volume of unbooked assistance incomplete (row 16). If this does not match (for example an assistance has more than one failure reason), please provide information in the commentary box;

D3). The volume of booked assistance (row 6) should sum to the volume of booked assistance completions (row 7) plus the volume of booked assistance incomplete (row 8).

D4). The volume of unbooked assistance requested (row 14) should sum to the volume of unbooked assistance completed (row 15) plus the volume of unbooked assistance incomplete (row 16).

Annex 3: ORR guidance for categorising Covid-19 related complaints.

This annex provides guidance for how operators should classify Covid-19 related complaints. This will help ensure consistency with complaints reporting across all operators. This information is also available within the complaints mapping document sheet within the Core Data reporting template.

This annex may be updated throughout the year if new Covid-19 related scenarios emerge or in response to feedback from operators or users of the data.

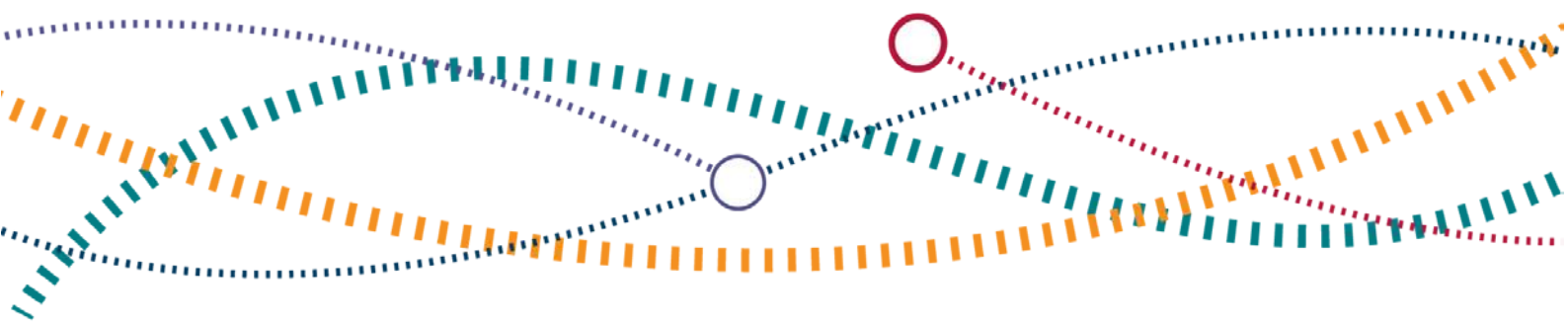
Type of Covid related complaint	Where it should be categorised (shown as: level 2 > level 3 category)
Complaints about insufficient room on the train to enable compliance with social distancing rules. For example, this could include complaints about social distancing on trains.	Quality on Train > Sufficient room for all passengers to sit/stand.
Complaints about the cleanliness of the train. For example, this could include complaints about sanitization of the train.	Quality on Train > The cleanliness of the inside
Complaints about the cleanliness of the station. For example, this could include complaints about sanitization of the station.	Station Quality > Cleanliness
Complaints related to Covid health and safety issues. For example, this could include complaints about passengers not wearing face coverings or enforcement of face coverings.	Safety and Security > Your personal security on board or Safety and Security > Your personal security whilst using station

Type of Covid related complaint	Where it should be categorised (shown as: level 2 > level 3 category)
Complaints about policy regarding face coverings. For example, passengers making complaints about having to wear face coverings.	Company policy > Other policy
Complaints about refunds due to Covid. For example, complaints about season ticket refunds due to Covid.	Company policy >Ticketing and refunds policy

© Office of Rail & Road 2021

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3

Where we have identified any third-party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at orr.gov.uk

Any enquiries regarding this publication should be sent to us at orr.gov.uk/contact-us