

Annette Egginton

Head of Competition and Consumer Policy
Directorate of Railway Markets & Economics

Email: annette.egginton@orr.gsi.gov.uk

16 January 2017

Ron Smith
Chief Executive Officer
Glasgow Prestwick Airport

Dear Ron

Approval of Glasgow Prestwick International Airport Ltd Complaints Handling Procedure (Condition 6 of the Station Licence)

Thank you for submitting your draft Complaints Handling Procedure (CHP) for approval. A copy of your revised CHP is attached to this letter, and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your CHP against the 2015 "Guidance on complaints handling procedures for licence holders" (the guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your station licence. We also sought views on your draft CHP from Transport Focus.

We welcome your commitment to respond to passenger complaints within 10 working days, which we believe is likely to be positive for passengers.

You have confirmed that you are currently making changes to your website in order to ensure that it meets the minimum requirements of the guidance. You have informed us that this work is planned to be completed by 31 January 2017. Please inform us when this work has been completed.

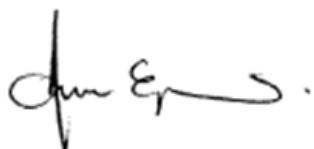
In the case of Glasgow Prestwick Airport, the relevant passenger body is Transport Focus. In line with the requirements of the guidance, licence holders must establish an appeals handling protocol where the passenger bodies require this. We understand that these protocols have now been agreed and we expect licence holders to abide by them in their handling of appeals.

Finally, you have confirmed that, in cases where there is a contractual obligation between Glasgow Prestwick Airport and the passenger and where a complaint has not been resolved and your internal procedures have been exhausted, you will provide information on Alternative Dispute Resolution (ADR) to the complainant, and identify approved ADR providers. This is in accordance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015.



This approach appears to discharge the information requirements in the Regulations, however, please note we will be engaging with ATOC and the Department for Transport as to the application of the ADR regulations more generally and this may result in the need to revisit policies in due course.

Yours sincerely,



Annette Egginton





Complaints Handling Procedure

How we deal with your complaints

Introduction

Welcome to Glasgow Prestwick Airport (GPA). GPA is committed to delivering the best possible service for all of our customers, whether you use general, military, cargo, executive or passenger aviation, as well as those of you who access our property related services, car parking, railway station and any of our facilities. The high standards that we set for ourselves applies across our full estate.

Although we endeavour to do everything that we can to maintain high quality facilities and experiences, we understand that there may be occasions when you may not be satisfied with your interaction with us.

To enable us continuously to improve and offer resolutions when you have a grievance with us, we have developed this procedure for you to provide us with feedback, comments and complaints. This procedure incorporates the actions that we will take to ensure that you are aware of how to provide feedback, comment or make a complaint and what we will do to ensure that this procedure is accessible as possible.

We consider a complaint to be:

“Any expression of dissatisfaction by one or more customers about Glasgow Prestwick Airport’s action or lack of action, or about the quality or standard of service provided by Glasgow Prestwick Airport.”

This document explains how you should make your complaint to us, and how we will respond to you.

Ron Smith
Chief Executive Officer
Glasgow Prestwick Airport
Prestwick
Ayrshire KA9 2PL

December 2016

1. How to Complain

We are committed to ensuring that there are no barriers when you have cause to complain. Complaints can be made in a range of ways as detailed below:

- **Face to Face** – You can speak directly with any member of staff, who can escalate any issues to their manager if required. Staff members will endeavour to resolve any issue there and then. If we are unable to resolve your issue and you would like to make a complaint, you can do so online, by email, using a complaints leaflet or in writing.
- **Social media** – customers can comment through our social media channels (twitter - @GPAPassenger or @GPABusiness or Facebook – Glasgow Prestwick Airport), which are managed by our communications and marketing team. Your comment will be responded to and passed to the Client Experience Manager. If we are unable to resolve the issue and you wish to make the comment a complaint, we will take the conversation offline and continue it on a one to one basis by email or in writing. If you subsequently wish to make a complaint, you may do so online, by email, using a complaints leaflet or in writing. Our House Rules are available on how we engage with complaints and comments on our social media site.
- **Complaints leaflet** – leaflets are available throughout the airport – in our terminal building at our Information Centre, in our Fixed Base Operation and Cargo facilities. You may obtain a leaflet also by asking any member of staff.
- **By e-mail** – You may e-mail your complaint to communications@glasgowprestwick.com
- **On-line through Airport website** – www.glasgowprestwick.com/contactus
- **By letter** – Letter should be addressed to Comments, Feedback and Complaints, Communications, Glasgow Prestwick Airport, Aviation House Prestwick, KA9 2PL
- **By telephone** – Please call 01292 511000 if you wish to complain by telephone. The operator will take details of your complaint, and pass it on to our communications team to action.

You may give your permission or authority to your carer, support worker or guardian to complain to us on your behalf if you are unable to make the complaint yourself.

2. Essential Information

To help us to deal with your complaint, it is important that you include the following information:

- Your name and contact details
- Date of travel
- Identify the airport service area you are complaining about, for example, the

railway station, car parking, passenger services, security, retail or food and beverage

- The reason for your complaint
- A description of the problem and how you were inconvenienced
- What you want us to do.

3. How we will deal with the complaint

When we receive your complaint, we will pass it to the departmental manager responsible. If the complaint is straightforward, and easily resolved, we will respond to you immediately. Otherwise, we will take the following action:

- Acknowledge your complaint within two working days and fully investigate it
 - If your complaint is about the railway station, and includes any comments made about the train service or train journey you made to or from the airport, we will consult with the train operator and we will coordinate the response to you.
 - If your complaint is only about the train service or a train journey to or from the airport, we will pass it onto the train operator concerned who will respond directly to you.
 - Should your complaint be about food and beverage or our retail services operated by our onsite business partners, we will pass these on to the operator concerned who will respond directly to you
 - If your complaint covers different areas of the business, we will collate the responses from these areas and then respond to you.
- Respond within 10 working days and explain the outcome of the complaint or whether we need to carry out further investigation into the issues that you have raised.
- If the complaint is of a complex or serious nature, we may need to carry out a more detailed investigation into it. In these circumstances, we will advise you accordingly, and aim to respond to you within 20 working days.
- Our response will include, where relevant, an apology, details of any action taken, details of any enquiry and/or investigation carried out and whether it has been upheld, partially upheld or not upheld. If the complaint is not upheld it will also include the reason for this.

Our response to you will be either by the same means of receipt or by your stated preference.

Should our timescales for responding to you not be met because of a sudden or unexpected large increase in the volume of complaints, we will notify you of emergency response timescales until the situation reverts to our normal volumes.

4. Frivolous and Vexatious Complaints

We reserve the right to terminate any correspondence that we believe is frivolous, vexatious or abusive. If we take this action, we will

- Work within the guidance given to us on this subject by our regulatory bodies
- Inform you of our decision and the reasons why
- Advise you of any appeals procedure.

5. Confidentiality

We will investigate and deal with your complaints in strict confidence, and all of the information relating to your complaints is held in compliance with the Data Protection Act 1998. We do not divulge any information that could allow you to be identified as part of any statistical analysis or improvement to services.

We may disclose, however, some or all of your details to third parties who may need to contribute to the answer to your complaint or where it is necessary for us to fulfil our own obligations or to bodies carrying out a statutory duty such as other transport operators or passenger representative bodies.

6. Appeals

If you are not satisfied with our initial response, please contact us again to enable us re-examine your complaint or you may contact either of the following bodies:

If your complaint concerns airport operations, you may raise the issue with the Civil Aviation Authority at www.caa.co.uk

If your complaint concerns the railway station, you may raise the issue with Transport Focus, which looks after the interest of rail passengers and may be contacted by the following means:

Transport Focus
www.transportfocus.org.uk

Email: advice@transportfocus.org.uk
Tel: 0300 123 2350
Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ
PO Box 5594
Southend On Sea
SS1 9PZ

We will advise you of these details in our second response to you.



Complaints Handling Procedure

Contents

No	Subject	Page
	Introduction	2
	Feedback mechanism and response	
1	Ownership of complaints	3
2	Promoting awareness	3
3	Accessibility	3
4	Equality and diversity	4
5	Respecting complainant confidentiality	4
6	Response times and informing complainants of progress	4
7	Empowering staff to resolve complainants at source	5
8	Full and fair investigation	5
9	Frivolous and vexatious complaints	6
10	Escalation	6
	Structure, people and processes	
11	Organisational structure and people	7
12	Training and development	8
13	Record keeping	8
14	Quality control	9
15	Complaint handling service standards	9
16	Organisational ownership and commitment	9

Introduction

Welcome to Glasgow Prestwick Airport (GPA). GPA is committed to delivering the best possible service for all of our customers, whether you use general, military, cargo, executive or passenger aviation, as well as those of you who access our property related services, car parking, railway station and any of our facilities. The high standards that we set for ourselves applies across our full estate.

Although we endeavour to do everything that we can to maintain high quality facilities and experiences, we understand that there may be occasions when you may not be satisfied with your interaction with us.

To enable us continuously to improve and offer resolutions when you have a grievance with us, we have developed this procedure for you to provide us with feedback, comments and complaints. This procedure incorporates the actions that we will take to ensure that you are aware of how to provide feedback, comment or make a complaint and what we will do to ensure that this procedure is accessible as possible.

We consider a complaint to be:

“Any expression of dissatisfaction by one or more customers about Glasgow Prestwick Airport’s action or lack of action, or about the quality or standard of service provided by Glasgow Prestwick Airport.”

This document explains our policies and practices to ensure that Glasgow Prestwick Airport is fully accessible to as many people as possible.

Ron Smith
Chief Executive Officer
Glasgow Prestwick Airport
Prestwick
Ayrshire KA9 2PL

December 2016

Complaints Handling Procedure

Feedback Mechanisms and Response

1. Ownership of complaints

We will answer all complaints that are received affecting the service provided by us to our customers. If any complaint received also affects the service provided by any other company, (for example the train service serving our station or an airline service) we will forward the complaint to the company concerned and let the customer know what we have done.

2. Promoting awareness

Details about how to make a complaint are shown:

- On our website
- On leaflets available at various locations across the airport.
- On our 'Welcome to Prestwick International Station' poster displayed on entry and exit of the railway station.

3. Accessibility

We are committed to ensuring that Glasgow Prestwick Airport is available and accessible to all our customers and that there are no barriers to customers who have cause to complain. Complaints may be made in a range of ways as detailed below:

- **Face to Face** – customers can speak directly with any member of staff, who can escalate any issues to their manager if required. Staff members will endeavour to resolve any issues there and then. If they are unable to resolve the customer issue and a customer would like to make a complaint, they can do so online, by email, using a complaints leaflet or in writing.
- **Social media** – customers can comment through our social media channels (twitter - @GPAPassenger or @GPABusiness or Facebook – Glasgow Prestwick Airport), which are managed by our communications and marketing team. Customer comments will be responded to and passed to the Client Experience Manager but the conversation will be taken offline and continued on a one to one basis if it is a complaint. If the matter is unable to be resolved and the customer would like to escalate it, they will be advised to do so online by email, using a complaints leaflet or in writing. House rules are available on how we engage with complaints and comments on our social media site
- **Complaints leaflet** – leaflets are available throughout the airport – in our terminal building at our Information Centre, in our Fixed Base Operation and Cargo facilities. Customers can also get a leaflet by asking any member of staff.
- **By e-mail** – customers may e-mail complaints to communications@glasgowprestwick.com
- **On-line through Airport website** – www.glasgowprestwick.com/contactus

- **By letter** – Letter should be addressed to Comments, Feedback and Complaints, Communications, Glasgow Prestwick Airport, Aviation House Prestwick, KA9 2PL
- **By telephone** – Please call 01292 511000 if you wish to complain by telephone. The operator will take details of your complaint, and pass it on to our communications team to action.

The complainant may give their permission or authority to their carer, support worker or guardian to complain to us on their behalf if they are unable to make the complaint themselves.

4. Equality and diversity

We will make reasonable adjustments for customers with accessibility requirements. This will include, where required, providing information in a range of formats and languages at the request of service users to ensure that this procedure is as accessible as possible.

5. Respecting complainant confidentiality

All information relating to complaints will be held in compliance with the Data Protection Act 1998. Any detail of a complaint that could allow a complainant to be identified will not be revealed as part of any statistical analysis or improvement to services. We may, however, divulge some or all of a complainant's details where it is necessary for us to fulfil our obligations or to bodies carrying out a statutory duty such as CAA or Transport Focus.

6. Response times and Informing complainants of progress

Upon receipt of complaints, we will immediately pass it to the departmental manager or business partner responsible, and will carry out the following process:

- Categorise complaints by 2 stages:
 - Stage 1 – Complaints that can be resolved immediately, or within 10 days by the manager responsible for the service concerned
 - Stage 2 – More complex complaints that require investigation or have been appealed following a response at Stage 1.
- Acknowledge the complaint within two working days by the same means as the receipt of the complaint and instigate a full investigation of it.
- Should the complaint be about food and beverage or retail services operated by onsite business partners, we will pass these on to the operator who will respond directly to the complainant
- Should the complaint be about the railway station, we will pass on to the train operator any comments also made about the train service or a train journey made to or from the airport. The train operator will respond to us about these issues and we will co-ordinate a response to the customer.

- Any complaint only about train services or a train journey to or from the airport will be passed to the train operator to respond to.
- Should the complaints cover different areas of the business, the responses from these areas would be collated by the Client Experience Manager who would then respond to the complainant
- Where the complaint involves aspects of the services on the airport, we will co-ordinate a response.
- When the complaint is straightforward, requiring limited or no investigation and easily resolved, we will respond to it immediately.
- We will aim to respond to complaints within a maximum of 5 working days. In exceptional circumstances, there may be reasons why a full response or resolution cannot be issued within this timescale. If this happens, the complainant will be advised and given an explanation as to why the timescale cannot be met. The extension to the timescales in this situation will be no later than 10 working days from the date of the initial complaint being received.
- If the complaint is of a complex or serious nature, we may need to carry out a more detailed investigation into it. In these circumstances we will advise the complainant accordingly, and aim to respond within 20 working days.
- Should the timescales for our response not be met because of a sudden or unexpected large increase in the volume of complaints, we will implement an emergency response timescale until the situation reverts to our normal volumes. We will notify the complainant of this, and also both ORR and Transport Focus.
- Our response will include, where relevant, an apology, details of any action taken, details of any enquiry and/or investigation carried out and whether it has been upheld, partially upheld or not upheld. If the complaint is not upheld it will also include the reason for this.
- The method of responding to customers will be determined by the customer's initial method of contact, or by their stated preference.

We will respond to all complaints that relate to circumstances or events that have occurred within the previous six months. We may however, apply discretion in certain circumstances if there is a substantial reason that has prevented the complaint being raised within this timescale.

7. Empowering staff to resolve complaints at source

We encourage our employees to resolve complaints they receive at source whenever possible. If customers request a formal response, however, we will do so in a means of their choice.

8. Full and fair investigation

All complaints received will receive a full and fair investigation. The depth and size of Investigation will depend upon the complexity of the complaint.

- Complaints that are straightforward will either be resolved face to face or passed to the manager responsible for the subject of complaint who will investigate and respond accordingly within the timescale of 5 working days.
- In certain cases where the investigative process may need more time, a response will be made within 10 working days.
- Complaints that are more complex or serious will be the subject of a more detailed investigation, which is likely to extend the response time to 20 working days.
- Complex and serious complaints will normally be passed to a Complaints Investigator, independent of those responsible for the subject of the complaint, who will be responsible for bringing the complaint to a conclusion and response to the complainant. If the investigator finds that the response will be in excess of our response times, the complainant will be advised, with the reasons why.

The investigative process will seek to analyse the complaint, gather evidence, corroborate and analyse the evidence, determine what actually happened and identify the root cause of failings.

The Chief Executive Officer will normally sign off responses to complex and serious complaints, following investigation. The response will always be in writing in the form of a letter or by e-mail depending on the complainant's initial method of contact, or stated preference.

9. Frivolous and vexatious complaints

We reserve the right to terminate any correspondence that we believe is frivolous, vexatious or abusive. If we take this action, we will:

- Work within the guidance given to us on this subject by our regulatory bodies, particularly in the case of a complaint about the railway station by the Office of Rail and Road.
- Inform the complainant of our decision and the reasons why it was taken and advise them of any appeals procedure

10. Escalation

If a customer is not satisfied with the outcome of a complaint following the investigative process, they may contact us again so that we can carry out a further investigation or they can contact one of the following recognised passenger appeal bodies:

- If the customer is not satisfied with our response concerning airport operations, they should contact the Civil Aviation Authority www.caa.co.uk
- If the customer is not satisfied with our response concerning the railway station, they may contact Transport Focus, either by:

Transport Focus
www.transportfocus.org.uk

Email: advice@transportfocus.org.uk

Tel: 0300 123 2350

Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ
PO Box 5594
Southend On Sea
SS1 9PZ

Our second substantive response will signpost the customer of their right of escalation.

Structure, people and processes

11. Organisational structure and people

Our Client Experience Manager – working with the relevant departmental managers and/or business partners, handles complaints.

Client Experience Manager will:

- Co-ordinate complaints across Glasgow Prestwick Airport.
- Allocate complaints to a Departmental manager(s) or business partner(s) at Stage 1, or Complaints investigator at Stage 2.
- Maintain an overview of complaints across Glasgow Prestwick Airport and ensure Departmental managers and Complaints investigators are progressing complaints within the agreed timescales.
- Monitor the complaints being received and co-ordinate the analysis of trends.
- Ensure the information obtained through the Client experience manager is used to inform, service and policy development and contribute to an improved quality of service for customers.
- Provide administrative support to the process, through the ongoing administration of the systems
- Ensure the effective allocation of complaints to Departmental managers and investigators.
- Support and monitor the progress of complaints and ensure the, Departmental Managers and Investigators are aware of expected timescales.
- Ensure that responses dealt with by the Complaints Investigator (s) are checked and signed by the Chief Executive Officer or designate and issued to the customer in the appropriate format.

Departmental manager or business partner(s) will:

- Take responsibility for complaints allocated to them.
- Track the progress of the complaint through managing all associated tasks through the systems, which support the Client experience manager.
- Progress the complaint to conclusion and prepare a response for the Client

experience manager advising them of the outcome of their complaint within the agreed timescales.

- Ensure systems are maintained which record all outcomes, highlighting action taken.

Complaints Investigator(s) will:

- Take responsibility for complaints allocated to them
- Investigators, who will be independent of those responsible for the subject of the complaint, will take responsibility for complaints allocated to them to bring to a conclusion and response to the complainant.
- If the investigator finds that the response will be in excess of our response times, the complainant will be advised, with the reasons why
- Carry out an investigation of the complaint.
- Track the progress of the investigation through ensuring all associated tasks are recorded through the systems, which support the Client experience manager.
- Progress the investigation to conclusion and prepare a response for the Client experience manager advising them of the outcome of their complaint within the agreed timescales.
- Ensure systems are maintained which record all outcomes, highlighting action taken.
- Overall responsibility for ensuring that complaints are managed in accordance with this process lies with the Chief Executive Officer.

12. Training and Development

All Airport employees will undertake customer service training, which will include training on the complaints handling procedures and will be responsible for complying within the principles and standards in this Policy.

Employees who have a specific responsibility and role within the complaints handling procedures, which provide direct customer services and are responsible for supporting, co-ordinating or investigating complaints will receive detailed and comprehensive role specific training.

13. Record keeping

Glasgow Prestwick Airport will keep a record of specific complaints and complainant's details for a period of five years. After which we will dispose of these details securely – unless it is required to retain these details for any ongoing proceedings.

We will retain statistical information on the nature of complaints as part of its continuous improvement efforts and performance monitoring. This will be retained indefinitely. No personal information will be included along with this statistical information.

All complaints and feedback are logged in our system, and we maintain separate parts to distinguish between Complaints and Feedback.

14. Quality controls

Procedures are in place to manage the quality of day-to-day operations throughout the airport, and audits of our complaints process is carried out as part of our annual audit programme across all of our operations, including the railway station. The training of our staff is a key part of the process the required skills and competency are maintained to uphold our quality standards.

Monitoring

15. Complaint handling service standards

Glasgow Prestwick Airport will regularly monitor and review its performance against the complaint handling service standards that have been set. Results of the monitoring will be reported to the Chief Executive Officer and Executive Team quarterly and will be published on an annual basis.

Information from all complaints and comments received will be analysed and information will be used to provide management information quarterly to identify performance by service and to recommend where service improvements should be made. The analysis of complaints information will be reported to and monitored internally by the Chief Executive Officer and Executive Team on a quarterly basis.

We will report to regulatory bodies on our performance standards as agreed with them.

Organisational Culture

16. Organisational ownership and commitment

Glasgow Prestwick Airport is dedicated to providing high levels of customer service to ensure your experience is pleasant, efficient and effective. Through our consistently high level of customer service, we strive to be your airport of choice.

We recognise the value of listening to the feedback and complaints from our customers and take full ownership of them. We will use all information gained in this process to an enhancement and improvement in our services.

Our services and values are:

- Passionate by being proud and enthusiastic in our job
- Professional by ensuring we are friendly, open and helpful
- Integrity by being trustworthy, supportive and consistent
- Responsible by ensuring our customers feel safe and secure.