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Rosie Clayton  
Competition and Consumer Policy  
Office of Rail and Road  
One Kemble Street  
London  
WC2B 4AN

20 July 2015

Dear Rosie,

### **Complaints Handling Procedures – Consultation on guidance**

In response to the consultation request of the 6 May 2015 please find the below response made on behalf of Abellio Greater Anglia, following internal consultation with those parties associated with the processes undertaken within the Abellio Greater Anglia business, and our leadership team including the Customer Service Director Andrew Goodrum and Managing Director Jamie Burles.

#### **Question 1:**

**Do you agree with our overall purpose and scope? In particular, do you think that the way that we have distinguished feedback from complaints is helpful?**

Abellio Greater Anglia appreciates the consultation process which enables clarification, best practice and the establishment of a commonality of process amongst train operators. Abellio Greater Anglia have established communications between the Customer Contact Centre and Social Media teams whereby during the hours of operation they work to ensure that a piece of contact on Twitter which is deemed to be a complaint is directed to the Customer Contact Centre, or best point of contact within the internal business. From the Customer Contact Centre a case is created, and unique reference number provided. The contact is from that point then handled as a formal contact and recorded as such.

#### **Question 2:**

**Do you agree that the licence holder should coordinate responses relating to third party supplier? Please indicate in your response what the current practice is and identify any challenges arising from this proposed requirement? Do you agree with our reasoning contained above? Are there any other categories of third party supply that you consider should be explicitly covered within this obligation?**

Abellio Greater Anglia agrees that there are occasions when customer correspondence could be handled in a more customer focused and simplified manner and to that extent, where applicable, endeavor to coordinate responses. Abellio Greater Anglia has established contacts with key third party suppliers to ensure that there is a joined up approach. Where responses are sent from the third party there is sufficient contact to ensure that Abellio Greater Anglia receive a copy to ensure that we can deliver any required follow up action or informed correspondence to the customer.

#### **Question 3:**

**Do you agree that the three core standards form a reasonable basis from which licence holders can develop complaint handling procedures? Please identify any areas, for example:**

- a. **Where you would prefer more detail or additional clarity; and/or**
- b. **Where you consider the standards do not meet our intention to draft at sufficiently high level for licence holders to develop procedures to suit their own business models and the needs of their passengers. In particular whether the balance between specified obligations and a focus on internal culture and arrangements appears consistent with our stated regulatory approach.**

Abellio Greater Anglia believe that current in-house processes reflect the three core standards:

Feedback, mechanism and response: Staff complaints, complaints relating to assets and safety, and praise are all fed back via internal periodic reporting shared with the Customer Service Director and his direct report team on a weekly basis. Examples of current themes are shared during this process, also on a weekly basis. For directly accountable line managers or responsible persons any staff or safety matter is reported straight away as part of the in house process. All matters raised with the Customer Contact Centre are recorded using a CRM which enables all customer correspondence, internal communications and investigatory feedback to be held under one unique file.

People, process and structure: All processes within the Customer Contact Centre are documented within the department, and available securely within the organization via a bespoke portal. The organizational structure and job descriptions for all our job roles, including the Customer Contact Centre, are held within the HR element of the business, and internally within the relevant departments. The basic roles and responsibilities are available easily and clearly for all within the Abellio Greater Anglia (AGA) business to access internally. An in house employee monthly magazine serves to highlight and make clear key areas of the business in each edition to ensure all employees, including those without immediate internet/intranet access, are kept up to date with other core business areas in AGA.

Organisational culture: There is a clear structure with one location and one telephone number as the key place for customers to contact. Specific email addresses exist both for the Customer Contact Centre and other customer focused business areas. These are listed in the Contact Directory, accessed via 'Contact Us' on our Abellio Greater Anglia website as well as on Welcome posters at our stations. Online Delay Repay forms and contact forms accessible through the Abellio Greater Anglia website, as well as in Print at Home and paper formats available from our stations.

**Question 4:**

**Is the guidance around *Conducting a full and fair investigation and Effective response and resolution* helpful and/or sufficiently clear?**

The guidance is helpful, reaffirming current working practices based on similar structure.

**Question 5:**

**Do you consider that a CHP should contain a requirement to have an appeal handling protocol with PF and LTW? Do you agree that we should specify some of the detail including recommended response times? Alternatively, is there other detail that you think should be included?**

The current Abellio Greater Anglia CCHP has this detail contained within Appendix 2. Recommended timescales for response are detailed in the CCHP in section 6.1 and section 6.3. Abellio Greater Anglia will give consideration to adding in detail about how customers should expect us to handle responses during significant disruption when timescales to respond may be affected, however consider that it may be more helpful to our customers to publish a contingency programme of response times via our Social Media formats and on our website. This information would be updated regularly and in a format that was clear to understand.

**Question 6:**

**Are you content with the ORR's minded proposal to drop these two previous requirements? If not give reasons (licence holders to formally review their CHPs each year and to seek ORR consent for lengthening timescales)**

Abellio intend as good practice to continue to review CHPs on an annual basis, or as required. With respect to lengthening timescales Abellio Greater Anglia currently ensure that any disruptions which may impact are advised to PF and/or LTW, and Virginia Pamment proactively. Contained within the CRM function there is the scope to arrange swift acknowledgements and amend footers on customer correspondence to detail any lengthened or enhanced timescales to respond.

**Question 7:**

**Do you believe our proposed monitoring activities will be effective in ensuring compliance with the obligations? Is there any additional evidence that you would like to see included as part of this process?**

No concerns.

**Question 8:**

**We ask for comments on our initial approach and its impact, including both any costs and benefits that we do not identify.**

Section 2, point 2.16 refers:

Abellio Greater Anglia would seek clarity on the point raised by the ORR about coordinating responses, as Abellio Greater Anglia would not wish to deflect a customer to make a second contact with a supplier. Our current process is to acknowledge, address points relating to our service, liaise with third parties and either handle to resolve or ensure the customer is clear in what will happen next. For example, ensure the customer has the third party details and knows what to expect next should it be more appropriate for the third party to respond in greater detail.

Section 2, points 3.24 and 3.29 refers:

Abellio Greater Anglia would seek clarity on a number of statements made. Where contacts relate to multi TOC experiences or is received in error and refers to a different TOC entirely correspondence is passed to that operator. The

customer is advised, and provided with the key contact information for the operator to whom the correspondence has been sent forward. To suggest that a prior approval is sought from the customer could cause unnecessary delay to the customer receiving a resolution and thereby the ability to the respective operator to investigate and respond.

Abellio Greater Anglia understands the ORR is striving for a single point of contact for the customer, and thereby reducing the confusion for the customer, however 3.29 seems to suggest that where a single licence holder cannot address within one response that more than one operator responding to the customer is appropriate. Abellio Greater Anglia believe that where other operator issues may be classed a minor that this could be achieved, however would still recommend passing the customer detail to the other operator so that they can take the feedback forward internally, and if they decide it is the correct course of action may correspond with the customer.

Will the ORR provide further clarity so that all operators are clear of the type of approaches they would consider best practice by providing examples?

Section 2, points 3.25 and 3.26 refers:

Abellio Greater Anglia contact and Delay Repay forms and web forms do not currently provide customers with the option to select to 'opt in' or 'opt out' of being contacted by the ORR.

Abellio Greater Anglia can look to altering their contact forms, and providing information on the Abellio Greater Anglia website to enable this to be taken into consideration, however with the remainder of the franchise period in consideration this is an unforeseen cost at this stage for the business. Additional work would also need to be undertaken on the CRM to ensure this was accurately recorded. Further legal investigation is required to satisfy Abellio Greater Anglia about compliance to data protection.

Section 2, point 3.32:

Abellio Greater Anglia actively promotes all colleagues in our business to think about ways to improve how we operate. An internal company programme 'The Spark' encourages brainstorming and thinking outside the box with the end goal always a customer service improvement. Abellio Greater Anglia have a dedicated working group, which incorporates both customer service and operation based colleagues to drive real customer improvements. In addition the top five reasons for complaint are shared weekly and periodically with the business as a whole.

Abellio Greater Anglia provide every customer facing employee with a bespoke training course, which places customer service at the heart of the business.

Abellio Greater Anglia have two well established Passenger Panels built up from a cross section of users.

Section 2, point 3.44:

Abellio Greater Anglia are not happy that they should have a mechanism to identify vexatious complaints. We have concerns that this could affect reputation and is not acceptable as method of 'labelling'. Customers may request data held by them. Abellio Greater Anglia currently have in place a method of 'flags' which identify frequent claim habits or frequent correspondence. These are used to ensure that the agents handling the correspondence do not provide repetitious responses and enables the business to identify unusual Delay Repay claim habits.

Regular correspondents are sometimes assigned a key member of the Customer Contact Centre as the sole point of contact. This personal way of responding has been found to be effective.

Abellio Greater Anglia has taken part in the workshops provided by the ORR, and attended with other operators. This has helped us look inwards to our own processes and we value the opportunity to share best practice and ensure continuity of approach.

Yours sincerely,

Lynsey Flack  
Contact Centre Manager  
Abellio Greater Anglia