

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

27th July 2015

Dear Rosie

May we take this opportunity to share our considered thoughts on the complaints handling procedure consultation.

First Hull Trains consistently excels in customer satisfaction and has topped the National Rail Passenger Survey for two consecutive years.

It is in the passenger's best interest that organisations work with a culture for continuous improvement and therefore we recognise and support the core standards outlined in the document.

Passenger feedback is crucial to maintaining our best practice standards and the ongoing enhancement of services is vital to our brand and commercial performance. Therefore we take all complaints very seriously.

Openness and honesty are key values at First Hull Trains and we maintain these through our own internal housekeeping. However, as a small operator, we have some concerns with the consultation's proposals.

The introduction of reporting statistics to the ORR would require changes to our Customer Relationship Management systems (as well as corresponding costs) and add a layer of bureaucracy to the complaints handling process.

We believe this would distract from our ability to respond quickly to our customers. As an open-access operator any reduction in passenger satisfaction impacts on the commercial performance of the business and we take our ability to give a fast and direct response to our customers very seriously.

The same principle applies to the way that we respond to complaints made via social media. Whilst we do record such complaints and refer these to customer relations, we prefer to seek an instant resolution to the issue.

The recording of complaints through Social Media is incredibly difficult to achieve on a consistent basis and we have found that sentiments do not always reflect the true nature of the customer's emotions.

We would suggest that the most effective regime is to encourage firms to self-regulate and set their own levels of best practice, with a supervisory, 'check and challenge' approach taken by the ORR.

Finally, I would like to suggest that the recording of praise is encouraged and that complaints data is presented alongside the areas in which companies excel.

Yours sincerely



Tracey Parkinson
Customer Relationship Manager