

Dear Harriet/Scott,

Thank you for your time earlier this week to allow us the opportunity to provide feedback on the Complaints Handling Procedure.

As discussed, we are broadly happy with the purpose and scope of the complaints procedure but wanted to make the following points:

- **TOC ownership of complaints** - There is some concern regarding the ownership of complaints, particularly in the case of a delay. A TOC who delays a customer would take ownership of a complaint under the new guidance but the dissatisfaction may be linked to a customer being overcharged on a receiving TOC, for example if a customer missed their connecting train on which an Advance ticket was valid. Although I am sure TOCs would take their customer responsibilities seriously, the guidance may provide a perverse incentive to a long distance TOC not to exercise discretion or accept customers on different trains and routes during disruption, but to charge them for a new ticket, knowing that a metro or regional operator would be the owning TOC and be liable for the cost of the refund.
- **Third party ownership of complaints** – Although we would wish to take control of all customer complaints related to our service, including those services operated on our behalf, we equally believe that the customer is likely to get a far better response from service providers for some aspects of our service that we would not regard as core. For example, our car parks are generally quite small and are only present at a handful of stations, so they are not a core part of our service offer. We would like to suggest the potential for an “appeals” process, whereby a complaint to a service provider could be escalated to the TOC to investigate if a service provider has failed to respond within a timely manner.
- **Concessions** – Some parts of the guidance, i.e. social media, many not apply to some TOCs as the franchising authority (in our case, TfL) may take responsibility for key TOC activities. I assume, in a similar vein to the PIDD Local Delivery Plan, that we can make it clear within our CHPs that these areas are not within TOC control.

In addition, we wanted to mention that we were broadly happy with the core dataset for both the CHP and DPPP. As we discussed, many of these measures are already used by LOROL internally to review performance.

I hope this feedback is useful and we look forward to attending the workshop on the 29th.

Regards,

Kevin

Head of Customer Service Development
London Overground Rail Operations Ltd.

A: Overground House, 125 Finchley Road, Swiss Cottage, London, NW3 6HY