

Annette Egginton  
Head of Competition and Consumer Policy  
Office of Rail and Road  
1 Kemble Street  
London  
WC2B 4AN

July 21, 2015

Dear Annette,

### **Merseyrail – Complaints Handling Procedures**

Thank you for your letter of May 6, 2015 and for giving us the opportunity to review the core data included within our Complaints Handling Procedure. The following is our response to questions 1 to 7 in the ORR consultation and in line with the arranged workshop 29<sup>th</sup> June 2015 that Merseyrail colleagues attended.

Firstly, Merseyrail agrees with the overall purpose and scope of the ORR document. Drawing a distinction between actual complaints and feedback is particularly helpful. This is especially the case with social media where a high percentage of contacts can rightly be regarded as feedback rather than complaints.

Merseyrail third party suppliers include Lorne Stewart and Carlisle Facility Services. We already co-ordinate responses relating to complaints about these third parties and will continue to do so in the future. We do not, therefore, see this as a challenge going forward and would include any new third party suppliers within the process.

We welcome the introduction of the 3 core standards covering feedback mechanisms, people, process and structure and organisational culture. A clear internal complaints handling process which includes the involvement of our senior management team is a priority. A representative selection of complaints are reviewed on a monthly basis at our Service Delivery Group meeting and actioned to try to ensure an effective response to dissatisfaction is provided. The 3 core standards provide a reasonable basis for developing our Complaints Handling Procedure in the future and will be consistent with our own internal culture, business model etc.

Merseyrail considers that the guidance around Conducting a Full and Fair Investigation and Effective Response and Resolution is sufficiently clear. We welcome the opportunity to use our own judgement in the scale of any investigation required and the level of formality to be adopted. We agree that the definition of resolution is where there are no outstanding actions required by the company.

The current relationship which Merseyrail has with Transport Focus works well and we have a low volume of referrals from them. We will be more than happy, however, to establish a more formal appeal handling protocol with Transport Focus and will be happy to include recommended response times if this will be helpful going forward.

It is encouraging that ORR do not see the need to review our Complaints Handling Procedure each year is a positive move. However, we will ensure that the procedure is reviewed internally on a regular basis to maintain and develop robust processes are in place to ensure effectiveness. Similarly, we welcome the less formal approach towards lengthening response timescales due to unforeseen and specific events. We will of course make sure that the ORR is consulted in such circumstances and advised of what actions we will be taking to effectively deal with complaints.

Merseyrail feels that the ORR monitoring approach set out in the guidance is of assistance and provides a clear format of the requirements of our Complaints Handling Procedure. We will be happy to consider providing further information and to take part in an independent audit as required. We agree that there will be benefits in an approach that concentrates on outcomes for customers.

Finally, it may be of interest to you that we extended the Customer Relations Office opening hours to 0700 – 1900 around fifteen months ago. Given that the majority of our customers are commuters, this has helped to ensure that we are better able to help meet their needs. We also now provide out of hours social media cover in the event of service disruption. Currently we are updating our Customer Comment Forms to make them more informative and easy to use.

Yours sincerely,

Kaj Mook  
Customer Service Director