

Dear Rosie

Response as below- happy to clarify any points- I welcome the ORR drive on this issue.

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?

Yes.

Question 2:

Do you agree that the licence holder should coordinate responses relating to third party suppliers? 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?

Yes. I see all staff, core or contractor, being integral to service delivery. Responses to feedback and/or complaints should be consistent- to our customers a rude member of gateline staff or station cleaner represent the same railway! It would be for the TOC to manage service provision by contractors effectively- consistency of excellent service to the customer is paramount.

One supplier to be EXCLUDED naturally would be British Transport Police who have their own complaints handling mechanism covered by statute.

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.

Content with this.

Question 4:

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

It is clear and helpful.

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?

Any guidance would be useful- the industry needs to be consistent- some complaints may cover more than one operator eg treatment of a disabled customer travelling FGW, LU and TfL Rail- each response by respective TOCs/LU should be to the same standard [a high one]

Question 6:

Are you content with the ORR's minded proposal to drop these two previous requirements? If not give reasons.

Content with this.

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?

Yes- to benchmark the highest standard needs monitoring. The focus should be the end user, the customer, getting the best possible customer service, through compliance with the CHP.

Question 8:

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

Putting the customer first always costs money but the returns in respect of customer confidence and finance are enormous. At TfL Rail the customer is key- we would not see any of the proposals as cost negative- they are at the least cost neutral. Engagement from ORR is welcome and crucial- the whole journey experience of the customer requires high and consistent standards- complaints handling is key.

Kind regards

Julian Dixon M.Litt

Head of Security and Community Engagement
MTR Crossrail

