



Llywodraeth Cymru
Welsh Government

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

28 July 2015

Dear Ms Clayton

Consultation on revisions to complaints handling guidance for rail licence holders

We have noted the proposals set out in the consultation document regarding changes to the ORR's Complaints Handling Guidance.

Passenger feedback is an important measure of rail industry performance. Ensuring passengers have access to the information and mechanisms needed to effectively engage with service providers gives industry and government a useful source of information and increases passenger confidence in their ability to affect change.

On this basis, we broadly welcome the proposed improvements, particularly around enhancing the focus on outcomes, being inclusive of communications methods such as social media, building relationships with customers and providing the flexibility and encouragement for licence holders to adapt their approach towards their customers' needs.

To assist in achieving these objectives, it is important for the complaints process to be well communicated to passengers - both in terms of the steps passengers must take to make a complaint and their rights to compensation. Those who provide rail services in Wales should also ensure that this information is presented in both English and Welsh – something which the guidance does not presently acknowledge but we would wish to see reflected in the final version.

We also feel that it is important for procedures to be appropriately monitored and for appeals to be handled independently from operators. Therefore, we welcome the suggestion for Complaints Handling Procedures to include a requirement for appeals protocols to be established with Transport Focus and London TravelWatch. In addition, we would suggest that consideration be given to putting arrangements in place to ensure that the handling of appeals, including associated timelines, is consistent industry-wide. This consistency would yield benefits both for passengers and those managing processes.

Yours sincerely,

Rhodri Griffiths
Head of Transport Policy, Planning and Partnerships
Welsh Government