

Annette Egginton

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Directorate of Railway Markets & Economics

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07 November 2016

Mark Hopwood
Managing Director
Great Western Railway

Dear Mark,

Approval of First Greater Western Ltd. (trading as Great Western Railway) Complaints Handling Procedure (Condition 6 of the Station Licence and GB Statement of National Regulatory Provisions: Passenger)

Thank you for submitting your draft Complaints Handling Procedure (CHP) for approval. A copy of your revised CHP is attached to this letter, and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your CHP against the 2015 “*Guidance on complaints handling procedures for licence holders*” (the Guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your station licence and GB Statement of National Regulatory Provisions: Passenger (SNRP). We also sought views on your draft CHP from Transport Focus and London TravelWatch.

We welcome your CHP document which we consider to be concise, to cover all relevant points, and to be clearly drafted in plain English and free of jargon. We believe this will be positive for passengers.

You have confirmed that where a complaint has not been resolved and your internal procedures have been exhausted, you will provide information on Alternative Dispute Resolution (ADR) to the complainant, in accordance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015. This information will usually be highlighted to complainants in the second substantive response, when details of Transport Focus and London TravelWatch are also given. We understand that you will identify an approved ADR provider (in this case Ombudsman Services) but that you do not plan to make use of this provider and instead complainants will be advised to contact the existing passenger bodies. Where a complainant does contact Ombudsman Services you have an arrangement in place whereby they will be referred to the relevant passenger body.

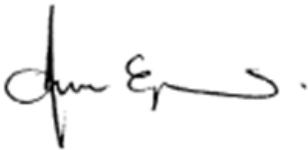
This approach appears to discharge the information requirements in the Regulations, however, we will be engaging with RDG and the Department for Transport as to the application of the ADR regulations more generally and this may result in the need to revisit



policies in due course. You will continue to be engaged with developing thinking through your representation at RDG.

In the case of Great Western Railway the relevant passenger bodies are Transport Focus and London TravelWatch. In line with the requirements of the guidance, licence holders must establish an appeals handling protocol where the passenger bodies require this. We understand that these protocols have now been finalised and we expect licence holders to abide by them in their handling of appeals.

Yours sincerely



Annette Egginton



Our Complaints Handling Procedure

How to make a complaint and what
you can expect from us

March 2016



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About this document



Inside, you'll find everything you need to know about how to make a complaint if you're unhappy with any aspect of our service. You'll find out what to expect when you get in touch with us, and what we do with the information you give us.

At Great Western Railway we define a complaint as:

'Any expression of dissatisfaction by a customer, or potential customer about service delivery or company or industry policy'

Other versions of this document

If you'd like this document in Welsh, or in an accessible format like Braille, Large Print, audio or easy read, you can go to GWR.com. Or ask our Customer Support team – here's how to get in touch with them.

Call: 03457 000125*

Email: GWR.feedback@GWR.com

Write to: Freepost

GREAT WESTERN RAILWAY
CUSTOMER SUPPORT

*calls to 0345 numbers cost no more than calls to geographic numbers (01 or 02) and are included in inclusive minutes and discount schemes in the same way. Calls from landlines are typically charged up to 9p per minute; calls from mobiles typically cost between 3p and 40p per minute. Calls from landlines and mobiles are included in free call packages.

More information

For more about our commitment to you, read this document alongside our Passenger's Charter and the National Rail Conditions of Travel. You'll find them both at [GWR.com](https://www.gwr.com)



Giving you the best service we can



We want every experience you have with us to be an easy one. So we work hard to give you a great service every time. But we know sometimes things go wrong. If they do, we want to hear about it so we can make it right, and stop it happening again.

If you do want to complain, we make it as easy as possible for you. But we know you'd probably prefer not to have to contact us at all. So we do whatever we can to make sure you don't have any reason to be unhappy. Here are just some of the things we do to make that happen:

- We work hard to understand the reasons why customers contact us – we try to address those reasons so you don't have to get in touch
- We make sure you can find the information you want quickly and easily
- We give our people the information, tools and training they need to answer your questions and resolve any problem on the spot
- If you do have to get in touch, we aim to put things right for you first time

We're always looking for ways to improve our service, and working with our people and processes to make them a reality.

In the meantime, we want to hear from you. If you tell us what went wrong, we can make sure it doesn't happen again.

Handling complaints fairly and efficiently



Our complaints handling process not only makes it easy for you to tell us you're unhappy, but helps us to put things right for you as quickly and fairly as we can. Here's how:

- It's easy to get hold of a copy of our complaints handling process – at www.GWR.com or at any of our stations – and to make a complaint (there's more about this on page 14)
- We write everything clearly and in plain English so there's no room for confusion
- If English isn't your first language, we'll reply clearly and appropriately for you
- We investigate every complaint fully and fairly
- We keep your details confidential (there's more about this on page 28)
- We address every point you raise with us so you get a full reply
- We do everything we can to put things right for you first time
- We monitor and audit our responses to make sure they're of a high standard
- Our managers get regular updates about the complaints so we can make changes where we need to
- We review our complaints handling process every year to make sure it's effective

When a third party's involved

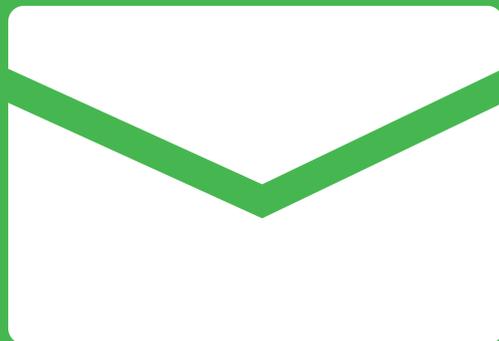
If your complaint involves another rail company or Network Rail, we'll send your complaint to them and ask them to get in touch. And we'll always let you know when we've done that.

If your complaint involves a journey that features more than one rail company, we will liaise with the other companies involved to ensure you receive a co-ordinated response.

We sometimes work with third parties who can help us deliver one aspect of our service safely. If your complaint involves one of those parties, you won't need to contact them directly. We will always deal with your complaint as if we provided the service for you.



How to make a complaint



If you're unhappy with any aspect of our service, there are several ways you can tell us.

Tell our staff at the station or on the train straightaway.

We train our staff to handle complaints fairly and efficiently, and to solve any problems there and then if they can and we provide a number of tools to enable this to happen.

If they can't, their manager or supervisor can help instead. That way, we can resolve everything for you as quickly as possible.

If you want your complaint to be formally recorded, or it involves a member of GWR staff and will require investigation into what happened, we will either provide one of our 'Tell us your views' forms or pass on your complaint to our Customer Support team directly.

Get in touch with our Customer Support team

If you don't tell our staff on the spot, you can get in touch with our Customer Support team, between 6am and 11pm every day except Christmas Day. They'll be happy to help with your complaint. Here's how to contact them.

Call: 03457 000125

Email: GWR.feedback@GWR.com

Write to: Freepost GREAT WESTERN RAILWAY
CUSTOMER SUPPORT

Web: www.gwr.com/help-and-support/contact

In addition, all GWR stations and trains carry copies of our 'Tell us your views' form which, once completed, can be sent to our Customer Support team via our freepost address. Just ask a member of GWR staff and they'll be happy to give you a copy.

Our Customer Support team's contact details can also be found on all of our major publications, prominently displayed at our stations, GWR website and via our Facebook page or our Twitter feed.

Get in touch with our Social Media team

You can also get in touch with our Social Media team regarding your complaint. They'll be happy to help and will either pass your complaint onto our Customer Support team on your behalf or wherever possible offer an immediate solution. Here's how to contact them.

Twitter: @GWRHelp

Facebook: www.facebook.com/GWRUK

Please note that we respect the privacy of our employees so won't discuss complaints about GWR staff on Facebook or Twitter. Any post that identifies a member of staff will be removed and the complaint passed to our Customer Support team to investigate and respond.

Meet our managers

We also hold regular sessions where you can talk to our senior managers and directors about our service if you're unhappy, or just want to find out more about our service. You can find out when the next sessions are at GWR.com.

What to include with your complaint

The more information you give us about your complaint, the sooner we can get back to you with a full reply. For example, please include things like:

- the time and date of your journeys
- the stations you travelled to and from
- the names of any staff involved
- copies of your tickets and any other documents that might help

Helping you make a complaint

You can ask a friend, family member, guardian, support worker or carer to make a complaint on your behalf. We'll need your permission for us to deal with another person before we discuss the complaint. This does not apply if you are the parent or guardian of a child aged 16 or under.

Penalty Fares

If your complaint regards the issuing of a Penalty Fare and you want to make an appeal, you must do so within 21 days of receiving the notice. Appeals can be made in writing to:

Independent Penalty Appeals Service
PO Box 30
Portsmouth
PO1 1ER

Or by visiting www.penaltyfares.co.uk

Claiming for losses, personal injury or property damage

If you need to claim for losses, property damage or personal injury, please write to or email our Customer Support team. They will forward your details to our claim handlers straightaway for you.



What you can expect from us



We work hard to handle complaints effectively. And we do everything we can to put things right for you. Here's what you can expect from us.

We'll get back to you quickly

When you contact our Customer Support team we'll always acknowledge receipt of your complaint.

We aim to get back to you within 5 working days if you make a complaint.

If we need to check any specifics before we reply, we aim to get back to you within 20 working days. We always let you know if we need to do this, and keep you up to date.

If the number of complaints we get goes up unexpectedly, or if our response is delayed for any other reason, we may not be able to get back to you within 5 days. If this happens, we'll let you know and will keep you updated.

We'll also update our website with the average time it's taking us to reply, and tell organisations like Transport Focus, London TravelWatch, the Office of Rail and Road (ORR) and the Department for Transport (DfT) as well.

We'll investigate your complaint carefully

We will fully investigate every complaint appropriately. This could mean:

- confirming the details of what happened
- collecting evidence
- interviewing any staff involved
- finding out what should have been done differently
- deciding on the appropriate response for you

Staff complaints

Complaints made about GWR staff members will be recorded onto our Customer Relationship Management system and forwarded to the relevant line manager so a full investigation can take place. Due to staff confidentiality we will be unable to share the details of any disciplinary procedures that may, or may not have taken place as a result of the complaint.

We'll pay compensation when it's due

If your train is delayed or cancelled, you may be able to get compensation. You can find out more in our Passenger's Charter www.gwr.com/about-us/our-business/passengers-charter.

If you complain about a delayed or cancelled train but haven't specifically requested compensation, we still will process a claim on your behalf and provide you with any compensation that may be due.

We look at each complaint individually. So if we think you've had a particularly bad experience, that isn't covered by the Passenger's Charter, we may give you a gesture of goodwill to make up for it.

If we feel that a customer's correspondence is becoming inappropriate in any way, we may stop responding. We will always get advice from Transport Focus and London TravelWatch before we do this, and it will be a last resort.



Taking your complaint further



If you're unhappy with our first reply, we'll look at your complaint again for you. We'll also make sure a manager reviews both your complaint and our initial response to make sure any mistakes are spotted.

London TravelWatch and Transport Focus were set up by Parliament to protect rail customers. If you're unhappy with the way we've handled your complaint, you have another option. At any time you can contact either organisation who will review your complaint and how we handled it.

After our second substantive response we will always provide their contact details in our correspondence and here's how to contact them.



London TravelWatch

169 Union Street
London
SE1 0LL

Call: 0203 176 2999

Email: enquiries@londontravelwatch.org.uk

Go to: www.londontravelwatch.org.uk

Twitter: @LonTravelWatch



Transport Focus

www.transportfocus.org.uk

Email: advice@transportfocus.org.uk

Tel: 0300 123 2350

Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ

PO Box 5594

Southend On Sea

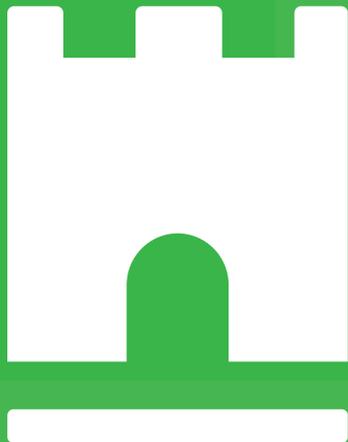
SS1 9PZ

Alternative Dispute Resolution

Please note that in addition to this, the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulation 2015 requires us to advise you of an 'alternative dispute resolution' (ADR) organisation for your complaint. In our case this is The Consumer Ombudsman www.consumer-ombudsman.org. However, as Transport Focus and London TravelWatch already provide a mediation service for customers in the rail industry, we do not make use of the ADR process and correspondence to the Consumer Ombudsman will be redirected to Transport Focus or London TravelWatch.



Your privacy and the Data Protection Act



Keeping your details secure is a top priority for us. So we follow our Privacy Policy and the Data Protection Act (DPA) very closely.

Here's what you can expect from us when it comes to keeping your details secure:

- We won't share confidential information with third parties without your permission in writing – unless we have to meet our responsibilities to insurers, other train companies, Transport Focus, London TravelWatch, and any statutory bodies like the DfT, ORR or RDG (Rail Delivery Group, formerly the Association of Train Operating Companies)
- The ORR and RDG might use your information for research purposes – for example, they may contact you to find out more about why you complained – but you can opt out of this if you want to
- When you contact us, we store your personal details on our dedicated and secure systems
- We're committed to the DPA and to protecting any personal data we hold on our systems
- We train all of our staff in how to follow the DPA, and we review our processes regularly to make sure they're in line with the Act

- All correspondence sent to our Customer Support team is stored electronically on our Customer Relationship Management system (CRM). Any paper mail is scanned onto the CRM and the original held in storage for 6 months before being securely destroyed
- If we don't hear from you for 3 years, we will securely and permanently delete any personal details we have for you on our systems



Further information



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GREAT WESTERN RAILWAY
CUSTOMER SUPPORT

GWR.com

03457 000 125 (0600 to 2300 daily
except Christmas Day)



Find us on Facebook Messenger
Search for **Great Western Railway**



Follow us @**GWRHelp**



Download our app

to purchase tickets and check train times
text GWR to 86688



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When you buy our train tickets
online at GWR.com



Don't miss out on our latest offers, special deals and
news from GWR. Register your email
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Great Western Railway

Our Complaints Handling Procedure

How we deal with complaints
and complaints data

March 2016



What's inside?

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Improving our service



We know that the needs of communities and our customers change. And we want to carry on living up to your expectations, and our own high standards.

So when you get in touch with us with a complaint or some feedback, we record all the details – good and bad. We share your comments with the relevant areas of the business in daily, weekly and monthly reports. They go to the managers and senior managers responsible, as well as our directors.

The reports help us work out where we can improve, and what changes we need to make to give our customers a great service. That's why we're always happy to hear from you.

We will:

- use the complaint data to identify the root causes of complaints
- take action to reduce the chance of a similar issue happening again
- regularly review our performance when dealing with complaints to improve how we deal with them

We will also provide data to the Office of Rail and Road (ORR) on the number of comments and complaints we receive and how quickly we deal with them.

Recording complaints

All complaints, and any other comments, are recorded on our Customer Relationship Management (CRM) system against a set of categories that cover every aspect of the service we provide. This data is collated centrally and used to generate a number of daily, weekly and monthly reports that are passed to the managers responsible for that area of the business so trends can be identified and problems resolved.

Further high level reports on GWR complaint data is made available to both the senior managers and board of directors within GWR and used to contribute to high level governance and accountability for the service provided.

Each complaint made to us is important and valuable feedback on the service we have provided and feeds into an internal continuous improvement approach which seeks to identify the underlying causes of customer dissatisfaction. Each area of GWR meets regularly to review performance and to plan for the future. Accurate complaint data contributes to this process.

GWR complaint data is also shared with the ORR on a periodic basis.

Record keeping

All complaints are recorded along with general information that helps us identify areas of improvement. They include:

- journey information such as where the journey began and ended
- the date of travel
- the class of travel
- the type of ticket held
- the date of the journey
- the name of the advisor who dealt with the complaint
- the date we received the complaint, and the date we responded

When recording complaint data, the contact details, and any information that could identify the complainant is not included.

Staff complaints

All complaints regarding a GWR member of staff are recorded on our CRM and a full report of the customer's experience, along with any other supporting evidence is made available to their line manager as soon as possible so an investigation can take place.

Due to staff confidentiality we won't share the results of any disciplinary action that may, or may not have taken place as a result of the complaint.

We will also not discuss any staff complaints on any public Social Media forums.

Training

All customer facing GWR staff receive training in how to identify and resolve customer complaints. An ability and empathy to do so also forms part of our recruitment process and is embedded into the customer focused culture within GWR.

We commit to ensuring all GWR staff, including any staff working on our behalf, are aware of our Complaints Handling Procedure and know how to direct complaints to the Customer Support team.

Our Customer Support team receives extensive training regarding how to identify a complaint, how to ensure each issue raised with us within that complaint is accurately recorded on our CRM, and how to resolve the complaint to the customer's satisfaction.

Quality Assurance

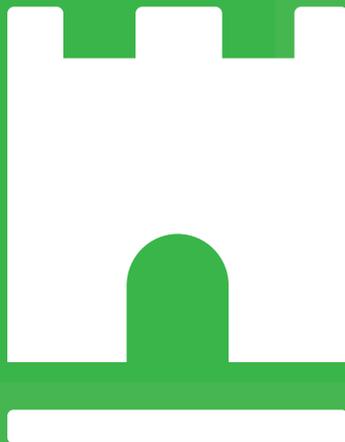
We regularly monitor our Complaints Handling process to make sure it is as effective as possible and adheres to the standards and commitments we have made to our customers. All calls to our Customer Support team are recorded and monitored to make sure we are dealing with complaints in the best way possible.

The Customer Support manager regularly reviews a sample of both calls and correspondence sent to our Customer Support team.

Each Customer Support advisor has their work monitored each month against a Quality Assurance framework to make sure our high standards are maintained. When appropriate, additional training and coaching is provided.

We also survey customers who have used our Customer Support service to see how satisfied they were with the process, and outcome of their complaint.

Customer data and the Data Protection Act



Keeping your details secure is a top priority for us. So we follow our Privacy Policy and the Data Protection Act (DPA) very closely.

Here's what you can expect from us when it comes to keeping your details secure.

- We won't share any confidential information with any third parties without a customer's permission in writing – unless we have to meet our responsibilities to insurers, other train companies, Transport Focus, London TravelWatch, and any statutory bodies like the Department for Transport, ORR or RDG (Rail Delivery Group, formerly the Association of Train Operating Companies)
- The ORR and RDG might use customer information for research purposes – for example, they may contact customers to find out more about why they complained. Customers can always opt out of this if they want to
- When contacted, we store customers' personal details on our dedicated and secure systems
- We're committed to the DPA and to protecting any personal data we hold on our systems
- We train all of our staff in how to follow the DPA, and we review our processes regularly to make sure they're in line with the act

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- All correspondence sent to our Customer Support team is stored electronically on our CRM. Any paper mail is scanned onto the CRM and the original held in storage for 6 months before being securely destroyed
 - If we don't hear from a customer for 3 years, we will securely and permanently delete any personal details held on our systems



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