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03 August 2017

Bob Allen
Managing Director
Locomotive Services (TOC) Ltd
(by email)

Dear Bob,

Approval of Locomotive Services (TOC) Limited's Complaints Handling Procedure (Condition 6 of the GB Passenger Statement of National Regulatory Provisions)

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

We note that, as a charter operator, Locomotive Services (TOC) Limited (LS TOC Ltd) differs from a franchised operator in the following areas:

- LS TOC Ltd will not be selling tickets or advertising tours directly, this will be done via a booking agent;
- The passenger-facing website will be that of the booking agent and not LS TOC Ltd's own website;
- The booking agent will be the main passenger interface for the booking of tours and will be one method via which passengers can raise complaints, but all complaints will be passed to LS TOC Ltd for investigation and response; and
- You have confirmed that when a booking agent is appointed the contract/service level agreements will reflect the need to fully adhere to and implement the CHP policy.

I confirm that we have reviewed your CHP against the key areas of the 2015 'Guidance on complaints handling procedures for licence holders' (the guidance), which we identified as being relevant to LS TOC Ltd's operations given the differences above. I can confirm that your CHP meets the requirements of Condition 6 of your GB Passenger Statement of National Regulatory Provisions (SNRP).

We welcome the following, which we believe are likely to be positive for passengers:

- Your commitment to investigate and respond to complaints received within 10 working days;
- Your commitment to make customer feedback forms widely available, including your onboard staff distributing them for completion on a voluntary basis; and



- Your delegation to the Train Manager sufficient authority to resolve the majority of on-the-day complaints.

You have confirmed that the website of your booking agent will comply with the minimum requirements of the guidance, including a clear signpost for charter passengers to the appropriate documents and complaints information. Please could you update us when this has been completed.

You have also confirmed that LS TOC Ltd will comply with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015 where relevant.

As you are aware, ORR is undertaking a wider review of policy with regard to charter and heritage operators and following this review, there may be a need to revisit your policy. We will be in touch with more detail later this year. Please note that this review may result in a requirement for some changes to your CHP.

Yours sincerely

A handwritten signature in black ink, appearing to be 'M. Clements', written in a cursive style.

Marcus Clements

Complaints Handling Procedures (CHPs)

Locomotive Services (TOC) Limited Charter Trains Policy

We aim to deliver the highest quality customer service throughout our heritage charter train services. All of our staff will be trained to deliver quality customer service.

For the purpose of this policy document a complaint is defined as:

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

The Managing Director has overall responsibility for handling complaints. His detailed knowledge of this process will be of great help, and he will work closely with other board members and line management to ensure a robust system is in place.

All third-party service level agreements with LS (TOC) Ltd contain a clause detailing their responsibilities and how we would work with them to resolve complaints.

All customer facing staff will receive training in customer service and the Complaints Handling Procedure. On the day complaints will be passed to the Train Manager, who will have an agreed level of financial authority sufficient to resolve the majority of complaints raised at the time.

We will resolve individual complaints promptly and fairly, recognising that there may be times when our customers, may not be entirely happy with all aspects of our customer service.

All customer facing literature (including information on the website) will contain information about how our customers can submit a complaint and arrangements should they not be satisfied with our response. This will include details of whom to contact and what additional information should be provided.

This will include confirmation that we will use relevant Alternative Dispute Resolution (ADR) bodies should this be requested

The LS (TOC) Ltd website will be easily accessible and the complaints page is accessible from the homepage and will contain details of how to contact LS (TOC) Ltd. It will provide arrangements for those who are visually or hearing impaired and a link to the LS (TOC) Ltd complaint handling service quality standards.

We will make customer feedback forms available on our website and on each of our services. Our on-train customer service personnel will distribute customer feedback forms to be completed on a voluntary basis.

Whenever we receive complaint we will:

- Acknowledge receipt of a complaint within 3 working days;
- Investigate circumstances surrounding the complaint within 7 working days;

- Respond to the complainant within 10 working days; and
- If resolution is not reached, we will escalate the issue to a senior manager and reach an agreeable solution within 20 working days from the initial complaint
- Where we are not able to respond within the given timescales above, we shall ensure that complainants are regularly kept updated and fully advised on the reason for any delay.
- Our aim is to ensure that all elements of a complaint are fully investigated and resolved.

We will continually develop our Customer Service and to ensure we can do this, we are developing a Customer Service Development Plan.

We will comply with the Data Protection Act by implementing strict controls on access to the data held by LS (TOC) Ltd

LS (TOC) Ltd is committed to ensuring the privacy of the data we hold and that this is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this privacy statement.

Our privacy policy is available from customerservices@lsitoc.co.uk.

Our Customer Service Development Plan

Learning More about our Customers' Needs

We will develop a system to document customer complaints and comments.

This will enable us to respond to our customer needs and will include:

- The customer's name, address, and phone number;
- The name of the LS (TOC) employee receiving the complaint;
- The date and time of the complaint and of its resolution;
- The nature of the complaint;
- The agreed upon solution, whether it was implemented on the spot, and if not when it was promised;
- What steps are currently being taken;
- The date and time of follow up to ensure the customer is satisfied;
- Any compensation given to the customer; and
- Suggestions on how the problem can be avoided in the future.

We will ensure that LS (TOC) Ltd meets its obligations under the Consumer Rights Act, when it applies. Mention of this will be included in our literature and on our web site.

LS (TOC) literature and its Web site will contain information on how to escalate any complaint, including the criteria used to control this process. This will include information on who will be involved and relevant timescales.

Learning from our employees, service providers and operational data

We will talk to our Customer Service team and service providers such as catering and train presentation about customer issues they deal with and look at data and statistics to determine how happy customers are with our services.

We will consider:

- Confirmation of customer service training and briefing
- Time to respond to a telephone call during office hours;
- Time to respond to a message left on the answer machine;
- Time to respond to an email enquiry
- Time to respond to a postal enquiry
- Ease of use of the website
- Reservation, booking and cancellation arrangements
- Number of on-train feedback forms completed – issues identified
- Number of website feedback forms completed – issues identified
- Number of customer who book or attempt to book a service with less than 72 hours
- Number of customers requiring assistance, type of assistance and the number of these customers that are not accommodated
- Feedback from our catering providers on provision of food & beverages
- Feedback from carriage cleaning services

Prioritisation of customer service development

We will identify our top three significant customer service issues

We will consider a range of metrics in order to create a list of issues and we will focus on ones that are important to our customers or that come up frequently.

Customer Services:

General telephone and help-line is available 01225 866205 on weekdays, between 09 00 and 16 00 with an answerphone available outside these hours.

Email: office@lsitoc.co.uk

Website [www.locomotiveservices\(toc\).co.uk](http://www.locomotiveservices(toc).co.uk)

Our opening hours will reflect the level of business and, during periods when we are not operating trains, LS(TOC) Ltd staff will be available part time. Details of these times will be provided via an answerphone message, and on our web site.

During the period leading up to, during, and immediately after an operation, LSL (TOC) staff will be available full time.

In addition, we will be contactable via our answerphone service, or web page. Our message in this respect will confirm call back details and timescales.

Communication of this Complaints Procedure

A copy of this procedure is available on our website. Copies can also be requested by mail to: Customer Services, Locomotive Services (TOC) Limited, 2 Whiteheads Lane, Bradford on Avon, Wiltshire, BA15 1JU. or via Email: office@lsloc.co.uk or by telephone on 01225 866205

A Large Print (.16 Arial) and Audio versions of this information is available on request.