

Martin Howard
Head of Customer Experience
Northern Railway

For the Attention of:

Marcus Clements
Head of Consumer policy
Directorate of Railway Markets & Economics
Office of Road and Rail Regulator.

E:
T:

5th October 2018

Dear Marcus

Re: Compliance with Condition 6 Station Licence and GB Statement of National Regulatory Provisions: Passenger

Further to your letter dated 14th September, I apologise for missing the response deadline of 28th September for the complaints element.

Complaint Handling

Please be assured that we take the agreed SLA of 95% of complaints responded to within 20 working days extremely seriously. As you point out we have failed to achieve this since RP11 2017/18. I can categorically state that this is not due to any lack of focus or productivity, as the points I will make should demonstrate.

Whilst I appreciate the weekly reports have shown no marked improvement, this must be seen in the context of the Carillion collapse, and record volumes of complaints received for 4 consecutive rail periods. The measures previously outlined have been implemented, and without them we would have been in a much worse position.

Some key facts I would like to bring to your attention are:

- Due to the Carillion collapse ARN inherited a backlog over 3,000 complaints when the function transferred internally to us in April 2018, with the oldest case dating back to 5th Feb 2018;
- This position was reported to ORR by Carillion/ARN on a regular, periodic basis;
- The in-house team managed to clear almost 3,000 complaints during April and May;
- At the same time we were hit with the late handback of Blackpool North (mid-April) and the May 2018 timetable issues in P2 of 2018. This resulted in **54%** increase in complaint volumes;
- The productivity of the complaints team has been remarkable. The team have closed 13,613 complaints between P1 and P5 2018 vs 6,925 in the same period last year;
- At the stage we started providing weekly reporting to the ORR we moved 5 additional FTE into complaints to support the volumes;
- We have since moved an additional 3 FTE into our complaints team to support the backlog reduction;
- Initially we split the team 50% focusing on the complaint backlog and 50% focusing on working complaints in the SLA threshold. This didn't have the desired impact as the backlog was decreasing slower than expected and we reported resolution rates of 67%, 53.5%, 58.3%, 56.5%;
- We changed the focus at the end of June to focus more resource on the backlog, with the exception of 3 FTE who worked current complaints. This reduced the overall number of

complaints, but had a negative impact on our % resolved within 20 days SLA which fell to 49.12%. We closed 5032 complaints which represents a 50% increase compared to previous periods;

- We currently have just under 2,000 complaints outside of SLA, driven by the huge spike seen from P2 to P5. Since P5 however we have closed 2544 more complaints than received, and we have remained in a net cleared position each period since;
- We have a hit squad who are currently targeting specific complaints that relate to the May 2018 timetable implementation so that we can respond with our standard response templates to speed up the process;
- We are continuing to assign additional resource from the call-taking team during quieter periods to support the current complaints managers; and
- Based on the current run rate, and without any new extraordinary events, I predict we will return to within the 95% in 20 days SLA within the next 3 periods.

Disabled People's Protection Policy (DPPP)

I would be pleased to meet with you separately to discuss our DPPP. I will include Peter Williamson, ARN's Accessibility and Disability Manager. When I am at your offices next week perhaps we can arrange a date for this meeting.

Delay compensation

At our meeting next week, I will walk through the changes we have made to our existing Delay Repay process, and the plans we have in place with the DfT to provide for the smooth introduction of DR15 in December 2018.

ORR complaint handling survey

I apologise that you have not yet received a copy of the template complaint closure email we are currently using. The wording we use is shown below:

"Together with the industry regulator (The Office of Rail and Road) we are currently conducting research into passenger experiences of complaint handling. This involves an online survey of no more than 5 minutes which is being managed by the independent research agency Critical Research. We would be grateful for your feedback which will help us improve the complaints process for all rail passengers. Please click on the link below to take part:

<https://www.crweblab.com/WebProd/cgi-bin/askiaext.dll?Action=StartSurvey&SurveyName=8128&TOC=17> "

I look forward to our meeting at your offices on Thursday 11th October. I will be accompanied by my Operations Manager, John Smith.

Your Sincerely



Martin Howard
Head of Customer Experience
Northern