

Annette Egginton

Head of Competition and Consumer Policy
Directorate of Railway Markets & Economics

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25 July 2016

Karl Watts
Managing Director
Rail Operations Group

Dear Karl,

Approval of Rail Operations Group Complaints Handling Procedure (Condition 6 of the GB Passenger Statement of National Regulatory Conditions)

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 this letter.

We note that, as a charter operator, Rail Operations Group (ROG) differs from a franchised operator in the following areas:

- ROG will not be selling tickets or advertising tours directly, this will be done via a booking agent;
- The booking agent will be the main passenger interface for both the booking of tours and complaints, with complaints only passed on to ROG should they need further investigation; and
- The passenger facing website will be that of the booking agent and not ROG's own website.

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 ROG's operations given the differences above, and can confirm that your CHP meets the requirements of Condition 6 of your GB Passenger Statement of National Regulatory Conditions (SNRP). We also sought views on your draft CHP from Transport Focus and London TravelWatch, who have provided useful feedback on your draft, although we recognise the passenger bodies will not be a point of appeal for complaints made about your services.

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

- Your target to investigate and respond to complaints received within 10 working days;
- Your commitment to conduct regular customer satisfaction surveys.



You have confirmed that the website of your booking agent, Vintage Trains, will be amended to comply with the minimum requirements of the guidance. You have confirmed that the Rail Operations website will include a clear signpost for charter passengers to the appropriate documents and complaints information on the Vintage Trains website. Please could you update us when this work has been completed, and in any case no later than 1 month from the date of this letter.

As you are aware, ORR intends to undertake 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 this review may result in a requirement for some changes to your CHP.

Yours sincerely,



Annette Egginton



Rail Operations Group Complaints Handling Policy

Background to Operation

The Rail Operations Group (ROG) offers a variety of services within the Rail industry so has many different customers and stakeholders to its business, including:

- Passengers
- TOC's
- Network Rail
- Members of the Public
- ROSCO's
- ORR
- FOC's
- Trainee Drivers

For ROG to continue to grow and thrive it is essential that we retain a consistent focus on providing a high quality service to all our customers and stakeholders and take robust action to address any concerns raised.

Policy Statement

ROG takes our role in helping to deliver high quality and safe services extremely seriously and are proud of the part we play on the Rail Network. We do, however, recognise that there may be times when our customers, or other stakeholders, may not be entirely happy with aspects of the way our services have been delivered. In such circumstances we have a robust complaints process designed to resolve any situation

Full details of the process by which ROG handles complaints can be found in the ROG Management Procedure, RMS026 – Quality & Complaints Management.

In brief, ROG pledges to:

- Acknowledge receipt of a complaint within 3 working days
- Investigate circumstances surrounding complaint within 7 working days
- Respond to complainants within the following targets:
 - 80% within 10 working days, and
 - 95% within 20 working days.
- If resolution is not reached, we will escalate the issue to a senior level and aim to reach agreeable solution within 20 working days
- Monitor customer satisfaction at senior level at least monthly
- Conduct regular Customer satisfaction surveys

Karl Watts

Managing Director

Rail Operations Group

June 2016

RMS026

Complaints Handling Procedure (CHP)



Index

Section		Page
	Administration	3
	<ul style="list-style-type: none"> • Document Control • Associated Documentation • Glossary 	
1	General	4
1.1	Purpose	4
1.2	Scope	4
1.3	Principle	4
Flowchart	Complaints Handling Process	5
2	Policy	6
3	Methodology	7
3.1	Management Responsibility	7
3.2	Responsibilities & Authorities	7
3.3	Communication of this CHP	7
3.4	Management Review	7
4	Resource Management	8
4.1	Provision of Resources	8
4.2	Human Resources & Training	8
4.3	Contingency Planning	8
5	Processes	9
5.1	Complaint received directly by ROG Staff	9
5.2	Complaint received via Booking Agent	9
5.3	Complaint received via Website/Social Media	9
5.4	Investigation of Complaints	10
5.5	Escalation of complaints	10
5.6	Record Keeping and Data Protection	10
6	Measurement, Analysis & Improvement	11
Appendix A	ROG Website – Contact Us page complaints Policy Link	12

Administration

Document Control

Issue No.	Revision	Prepared by	Approved by	Effective Date
1	First Issue	SJ Ferry	D Burley	01/07/16
2				

Associated Documentation

Within the Governance of this standard	Not within the Governance of this standard
<i>Rail Operations Group Safety Certificate</i>	<i>ORR Guidance on Complaints Handling</i>
<i>Rail Operations Group License</i>	<i>ISO9001:2015</i>
	<i>Data Protection Act</i>

Glossary

ROG	Rail Operations Group	SQE	Safety Quality & Environment
ORR	Office of Rail and Road	SPRG	Safety & Performance Review Group
CHP	Complaints Handling Procedure		

1. General

1.1. Purpose

- 1.1.1. For ROG to continue to grow and thrive it is essential that we retain a consistent focus on providing a high quality service to all our customers and stakeholders and take robust action to address any concerns raised
- 1.1.2. This document outlines how Rail Operations Group handles and manages complaints from customers to conclusion

1.2. Scope

- 1.2.1. The Rail Operations Group (ROG) offers a variety of services within the Rail industry so has many different customers and stakeholders to its business, including:

Within the scope of this Procedure

- Members of the public travelling as Passengers on ROG Operated Passenger Charter Services
- Training Services Customers or Trainees
- Neighbours

Outside the Scope of this Procedure

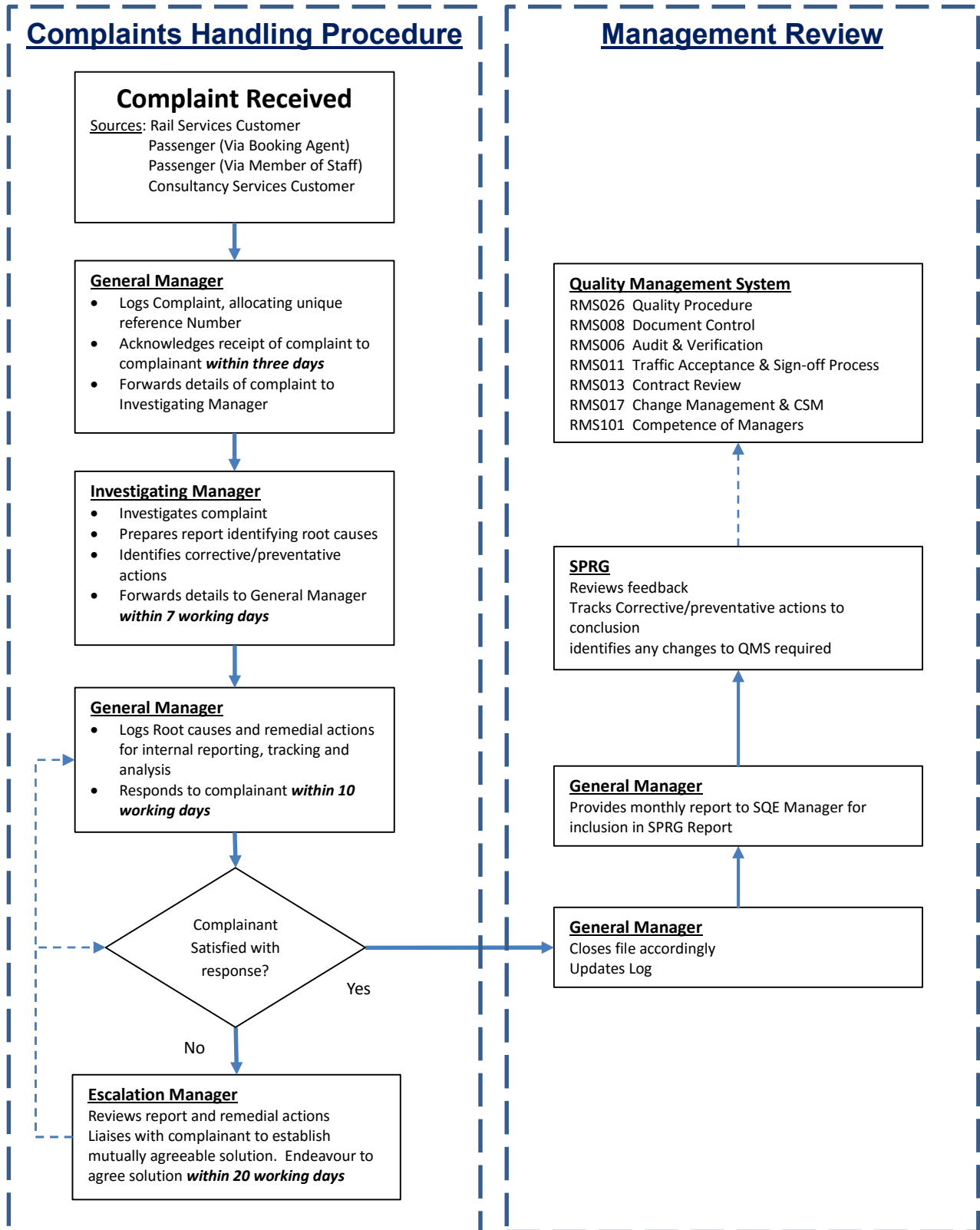
(Complaints handled through Contract Review or QMS)

- Customers receiving Consultancy Services
- Rail Services Customers (TOC/ROSCOs)
- Suppliers
-
- ORR
- Network Rail
- Competitors

1.3. Principle

- 1.3.1. ROG takes our role in helping to deliver high quality and safe services extremely seriously and we are proud of the part we play on the Rail Network. We do, however, recognise that there may be times when our customers, or other stakeholders, may not be entirely happy with aspects of the way our services have been delivered. In such circumstances we must have a robust complaints process designed to resolve any situation

FLOWCHART – Complaints Handling Process



2. Policy

- 2.1. Rail Operations Group are committed to providing a quality service to all its customers at the highest level and our Board recognises the importance of a learning from Complaints to help improve service delivery.
- 2.2. As such, our Managing Director has issued the Policy statement below, which is published on our website and briefed to all staff.

Management
SystemRail
Operations
Group

(RMS) RHL014

Rail Operations Group Complaints Handling Policy

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Policy Statement

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Full details of the process by which ROG handles complaints can be found in the ROG Management Procedure, RMS026 – Quality & Complaints Management.

In brief, ROG pledges to:

- Acknowledge receipt of a complaint within 3 working days
- Investigate circumstances surrounding complaint within 7 working days
- Respond to complainants within the following targets:
 - 80% within 10 working days, and
 - 95% within 20 working days.
- If resolution is not reached, we will escalate the issue to a senior level and aim to reach agreeable solution within 20 working days
- Monitor customer satisfaction at senior level at least monthly
- Conduct regular Customer satisfaction surveys

Karl Watts
Managing Director

Rail Operations Group

The Rail Operations Group is part of Rail Operations (UK) Limited.
Company number 08325626. VAT Registration No: 187395797

June 2016

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3. Methodology

3.1. MANAGEMENT RESPONSIBILITY

- 3.1.1. Irrespective of all other duties, the Managing Director has the defined authority and responsibility for ensuring that the requirements of this Complaints Handling Procedure (CHP) are implemented and maintained.
- 3.1.2. The General Manager is responsible for the day-to-day administration and maintenance of the Complaints Handling Procedure, reporting to the Operations & Compliance Director.

3.2. RESPONSIBILITIES & AUTHORITIES

- 3.2.1. The responsibility, authority and relationships of all personnel who manage, perform and verify work affecting quality are defined in the job descriptions for the role. These are maintained by the Head of Personnel and are available on request.
- 3.2.2. All staff are responsible for the quality of their own work, but it is senior management's responsibility to ensure staff are trained, methods of working are approved and adequate resources are provided for the handling and investigation of customer complaints.

3.3. COMMUNICATION OF THIS CHP

3.3.1. Internal

The detail of this CHP will be briefed to staff at Induction and will also form part of the regular briefing cycles of the Competence Management Systems.

3.3.2. External

- 3.3.2.1. Website - Rail Operations Group website will contain easily accessible links to the Company Policy on Complaints Handling, clearly explaining the process and target response times.
- 3.3.2.2. Third Party Booking Agents - Where customers initial point of contact may be with a third party booking agent, the agents' website will also be required to have clear guidance on their website and/or promotional material on the process for raising a complaint and target response times. This will form part of contractual agreements between ROG and any Third Party Agent

3.4. MANAGEMENT REVIEW

- 3.4.1. This CHP will be reviewed by Senior Management at a minimum of once per year, to ensure its continuing suitability, adequacy and effectiveness.

4. Resource Management

4.1. PROVISION OF RESOURCES

4.1.1. The company will determine and provide the necessary resources needed:

- to implement and maintain the CHP and continually improve its effectiveness; and
- To undertake a full and fair investigation of any complaints they may receive.

4.2. HUMAN RESOURCES AND TRAINING

4.2.1. Customer Facing Personnel

4.2.1.1. The company shall ensure that all customer facing personnel, including bookings staff,, whether provided by ROG or Third Party Tour Operators, shall be adequately trained to receive, record and pass on any complaints received from customers, and have the authority to resolve issues on the spot where possible.

4.2.1.2. Classroom training in the handling of customer complaints will be provided to all ROG customer facing personnel and to Third Party on-board staff. This will be supported by annual re-briefing as part of the ROG Competence cycle.

4.2.1.3. In addition, On-board staff will receive a pre-job briefing prior to the commencement of each Charter which will include guidance in relation to handling of any complaints arising during the Charter Journey

4.2.2. Personnel undertaking investigations into complaints received will also be provided with appropriate training to provide them with the competence to undertake a full and fair investigation.

4.3. CONTINGENCY PLANNING

4.3.1. The company will ensure that the potential requirement for additional resources during times of service disruption or in the case of a major incident form a part of our Business Contingency planning requirements, including the consideration of

- additional personnel - on-site, assisting Vintage Trains, or manning phone lines
- Amendment of voicemail messages to provide additional information/alternative contacts
- Website bulletins with updates/advice to customers

5. Processes

5.1. COMPLAINT RECEIVED DIRECTLY BY ROG STAFF

- 5.1.1. Any member of ROG frontline staff who is made aware of any customer complaint or dissatisfaction, shall make contact with the dissatisfied customer at the earliest opportunity to do all they can to resolve the problem straight away.
- 5.1.2. After having done all they can to resolve the issue, the member of staff will take contact details (Telephone and email address) from the customer, a brief record of the complaint and any actions they have taken to resolve the issue and record whether the customer is satisfied with the outcome.
- 5.1.3. Where the customer does not feel the issue is resolved, the member of staff will provide them with an outline of the ROG CHP and the timescales when they can expect a further response from ROG.
- 5.1.4. The member of staff will forward the contact details and complaint record to the General Manager before the end of their shift.
- 5.1.5. On receipt of the Record of Complaint from the frontline staff, the General Manager shall record the complaint into the ROG CHP system and formally acknowledge receipt of the complaint to the customer (Within 3 working days).
- 5.1.6. The process of Investigation and response as detailed in 5.4 is then followed.

5.2. COMPLAINT RECEIVED VIA BOOKING AGENT

- 5.2.1. Where our Booking Agent or other third party is made aware of a complaint or issue with any services operated by ROG, they will take responsibility for maintaining contact directly with the customer in line with their own Complaints Handling Processes. Target timescales are closely aligned and performance against these will form a standing agenda item at bi-monthly Contract Review Meetings between ROG and Third Party senior managers.
- 5.2.2. The Booking Agent/Third Party will complete a written record of the complainants contact details, the issue they have raised and any actions or assurances they have undertaken to resolve the complaint to date and will send a formal written acknowledgement of receiving the complaint to the customer within 3 working days.
- 5.2.3. The requirement to keep records of all complaints received, for examination by ROG through audit procedures is a pre-requisite of Contract and Service Level Agreements.
- 5.2.4. A copy of the written record will be forwarded to the ROG General Manager, who will record the complaint into the ROG CHP system.
- 5.2.5. The process of Investigation and response as detailed in 5.4 is then followed, with all responses and/or updates from ROG being provided to the Booking Agent rather than direct to the customer.

5.3. COMPLAINT RECEIVED VIA WEBSITE/SOCIAL MEDIA

- 5.3.1. The General Manager is responsible for monitoring issues raised via the 'Contact us' page of the ROG website.
- 5.3.2. Where a complaint regarding ROG services is observed by any member of staff on Social Media sites, they shall forward details to the General Manager
- 5.3.3. The General Manager will record details on the ROG CHP system and formal acknowledgement of receiving the complaint will be made to the customer within 3 working days where contact details can be established.
- 5.3.4. The process of Investigation and response as detailed in 5.4 is then followed,

5.4. INVESTIGATION OF COMPLAINTS

- 5.4.1. The General Manager shall assign investigation of the complaint to an appropriate member of staff within three working days of receipt of the complaint.
- 5.4.2. If the issue raised is in relation to a RIDDOR reportable event, details will also be passed to the SQE Manager who shall ensure reporting requirements are fulfilled.
- 5.4.3. The Investigating Manager shall undertake a full and fair investigation into the issues raised, if necessary making contact with the complainant to establish any additional details or concerns.
- 5.4.4. The Investigating Manager shall provide a written report and recommendations for resolving the customers issue and preventing reoccurrence to the General Manager within 7 working days.
- 5.4.5. The General Manager shall discuss the report and recommendations with the Operations & Compliance Director and a response to the customer/Third party agent shall be agreed which the General Manager will feedback to them within 14 working days.
- 5.4.6. Where a response within 14 working days is not realistic, due to complexity of the investigation or issues raised, the General Manager will advise the customer accordingly, providing an alternative timescale for response and commitment to keeping them informed of progress.
- 5.4.7. Where a large number of complaints have been received and the targets set for response look like they may be breached, the General Manager will advise the Operations & Compliance Director, who will ensure adequate resources are provided to resolve any issues and also advise ORR Complaints Team.

5.5. ESCALATION OF COMPLAINTS

- 5.5.1. Where a customer is not satisfied with the resolution of their complaint and requests an escalation of the issue, the General Manager shall forward all details to the Operations & Compliance Director, who will undertake any additional investigation and/or liaison with the customer until a satisfactory resolution can be reached.
- 5.5.2. Where necessary, the customer may be referred to an Alternative Dispute Resolution (ADR) provider that could deal with the complaint independently should the customer wish to use that service.

5.6. RECORD KEEPING AND DATA PROTECTION

- 5.6.1. The General Manager shall ensure that all complaints and issues are recorded on the CHP system, including actions taken and timescales of responses.
- 5.6.2. The CHP system will fully conform with all requirements of the Data Protection Act. Access to the system will be limited to named system administrators only, who are conversant with their responsibilities to personal data under the Act.
- 5.6.3. Where a request for copies of personal data held within the CHP system are made to ROG under the Data Protection Act, the General Manager shall process such requests in compliance with the requirements held therein.
- 5.6.4. Records within the CHP system shall be retained for a minimum of 7 years and personal details will be anonymised at the end of that timescale.

6. MEASUREMENT, ANALYSIS AND IMPROVEMENT

6.1. ROG Senior Management are committed to the continuous improvement of services and processes and this document, along with the rest of the ROG SMS have been developed to comply with the requirements of ISO9001:2015 standard for Quality Management Systems.

6.2. Measurement

6.2.1. Analysing customer feedback, including complaints, is considered a vital tool in ISO9001 in the goal of achieving continual improvement, reviewing the performance of the company and in planning future business strategies.

6.2.2. Data from the CHP system shall therefore be monitored, analysed and reported on as a regular agenda item for:

- The monthly Safety & Performance Review Group (SPRG), chaired by the Operations & Compliance Director
- Contract Review meetings with Booking Agents and/or Third Party Customers
- Executive Board Meetings
- Annual QMS Management Review Meeting, chaired by Managing Director

6.3. Analysis

6.3.1. Analysis of CHP data will include as a minimum the following (This list is not exhaustive):

- Performance of the CHP against response targets
- Identification of any common themes or causes
- Cross reference with types of rolling stock used
- Identification of DPPP issues

6.4. Continual Improvement

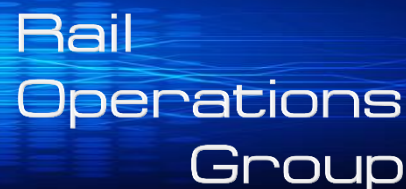
6.4.1. As the Tactical level meeting, SPRG is tasked with identifying any lessons which need to be learned from review of Complaints. Where these are identified they will be cascaded to all ROG staff, either via circulation of the minutes or by specific briefing. These briefings may also be cascaded to Booking Agents or Third Party Operators via Contract Review as appropriate.

6.4.2. Where additional Training is identified as a common theme/cause, SPRG will direct a review of training materials to ensure deficiencies have been addressed and re-review prior to implementation and cascade.

6.5. Strategic Business Planning

6.6. Review of CHP records and analysis is undertaken at a more strategic level by Executive Board and at the Management Review Meetings, which will be reviewing the evidence to inform its decisions in relation to:

- Review of Contracts or Service Level Agreements with Booking Agents
- Reviewing Traction and Rolling Stock Strategy
- Reviewing Staff resourcing levels and training requirements

Rail Operations Group Website Contact Us Page Complaints Link**Policy Statement**

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Managing Director

Rail Operations Group

June 2016

If you wish to make a comment to help us improve our services, please provide your Name, Email Address, Daytime Contact Phone number and postal address, along with your feedback to:

Email: info@railopsgroup.co.uk

Phone: 07712-329697 (0900-1600, Mon – Fri)

Post: Customer Services, Rail Operations Group, Office 23, Wyvern House, Railway Terrace, Derby DE1 2RU

Privacy Statement

Rail Operations Group will only use the information that we collect about you lawfully, in accordance with the Data Protection Act 1998 and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

By using this website, you agree that we may collect, store and use any personal information we collect about you for the purposes of providing you with personalised access to this website and to contact you (including by phone, fax, e-mail and SMS text messaging) with information which we think may interest you, including our regular electronic newsletter. You may instruct us not to send you this information at any time by contacting us at info@railopsgroup.co.uk

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