Reference guide for ORR Core Data compliance reporting

Version for station only operators or non-scheduled passenger services

Purpose of the document

This guidance has been produced to support station only or non-scheduled passenger services submit the Core Data reporting template. This refers to those licensees that were the subject of our Licence Outliers consultation process and at the conclusion of which were deemed to be within scope of regulation and required to supply ORR with ongoing compliance monitoring Core Data[1]. This document effectively sets out what data they are required to provide and the technical guidance on how to collect the data and the frequency with which it should be reported.

Contact details

For any questions or feedback please email rail.stats@orr.gov.uk or contact Christopher Casanovas (chris.casanovas@orr.gov.uk or 020 7282 3747).

[1] The consultation document and the decision letter can be viewed at: http://orr.gov.uk/rail/consultations/policy-consultations-by-topic/consumer-consultations/consultation-on-licence-outliers

1. Complaints Handling Procedure (CHP) reporting

What should count as a complaint

The complaints handling guidance (section 2.7 to 2.11) defines a complaint as:

> **2.7 For the purposes of these guidelines a complaint is defined as:**
>
> **"Any expression of dissatisfaction by a complainant or potential complainant about service delivery or company or industry policy"**

Within the data template the total volume of complaints closed is recorded. The following contact methods are in scope to be recorded (see table below). If the Operator receives complaints via another method not listed below, please ensure these complaints are also included within the total, unless they are listed in the out of scope section on the next page.

Contact Method	In Scope
Letter (including comment cards)	√
Email/Webform	√
Telephone Call	√
Meet the Manager	√
Online Forums (including live chat)	√

Meet the manager and online forums

ORR recognise that *meet the manager* and online forums can generate lots of customer feedback. In order for the feedback to count as a complaint the feedback should lend itself to investigation e.g. the complainant has expressed dissatisfaction about a specific aspect(s) of service. The licence holder should then assist the complainant in making a formal complaint, which will then be dealt with in accordance with the licence holder's Complaints Handling Procedures.

Live chat

Live chat is increasingly being used by Operators to interact with passengers. While many of the comments may be classified as general feedback or enquiries, the same approach listed for meet the manager and online forums above should be used to determine if correspondence needs to be escalated as a formal complaint.

Telephone complaints

All telephone complaints should be recorded. If a complaint is made without the person leaving their details, this should still be captured as a complaint within sections A and B.

What should not count as a complaint

The following criteria should not be counted as a complaint within the ORR report.

Contact method	In scope
Another operators complaint	x
Delay compensation claims (e.g. Delay Repay)	x
Feedback	x
National Rail Enquiries (NRES)	x
Praise (excluded from section B)	x
Social media (note below)	x
Transport Focus/London TravelWatch	x

Another Operator's complaint

Complaints which relate to another operator[2] should not be included within the complaint statistics. A complaint about a specific train, staff member, ticket office or station shall be owned by the licence holder responsible for that train, staff member, ticket office or station. If relevant, a complaint about a delay will be owned by the licence holder on whose train the passenger was travelling on, or supposed to be travelling on, when the delay occurred (see section 2.13 of the complaints handling procedure guidance).

Feedback

Feedback can take the form of comments which are neutral, positive or negative. Feedback comments should not be included unless they are classified as a complaint. Operators should have mechanisms by which such communication can be identified and dealt with appropriately. These mechanisms will be detailed in the Operator’s complaints handling procedure (see section 2.9 - 2.10 of the complaints handling procedure guidance).

[2] In the industry these are often referred to as ‘OTOC complaints’.

National Rail Enquiries Service (NRES)

Complaints about NRES should not be recorded within the ORR complaints data. Such complaints should be referred to National Rail Enquiries.

Social media

Comments received through social media should not be included in the complaints data. However, there may be circumstances in which the feedback on social media lends itself to further investigation. The licence holder should assist the complainant in making a formal complaint which will then be dealt with in accordance with the licence holder's Complaints Handling Procedures (CHP). For example, this may involve signposting the complainant to a webform or providing an email address at which they can log formal complaints.

2. Section B

This section covers the following CHP indicators:

- **Total number of complaints;**
- **Percentage of complaints responded to within specified targets**

Total number of complaints closed (row 7)

Metric	Contact method	P1	P2	P3
Total number of complaints closed	Total number of complaints closed			

Complaints closed

Complaint volumes are based on the number of complaints **closed** within a period. This includes complaints closed within the period even if they were received in the previous period. Once this data has been submitted to ORR it should remain fixed, with no further changes required.

First full substantive response volumes reported only

Complaint volumes are based on complaints which have had a first full substantive response only. The first full substantive response is defined as:

> **The Operator's first substantive response which in its view, reasonably provides a full response to the consumer's complaint. This does not include an acknowledgement or holding response.**

Correspondence following the first full substantive response

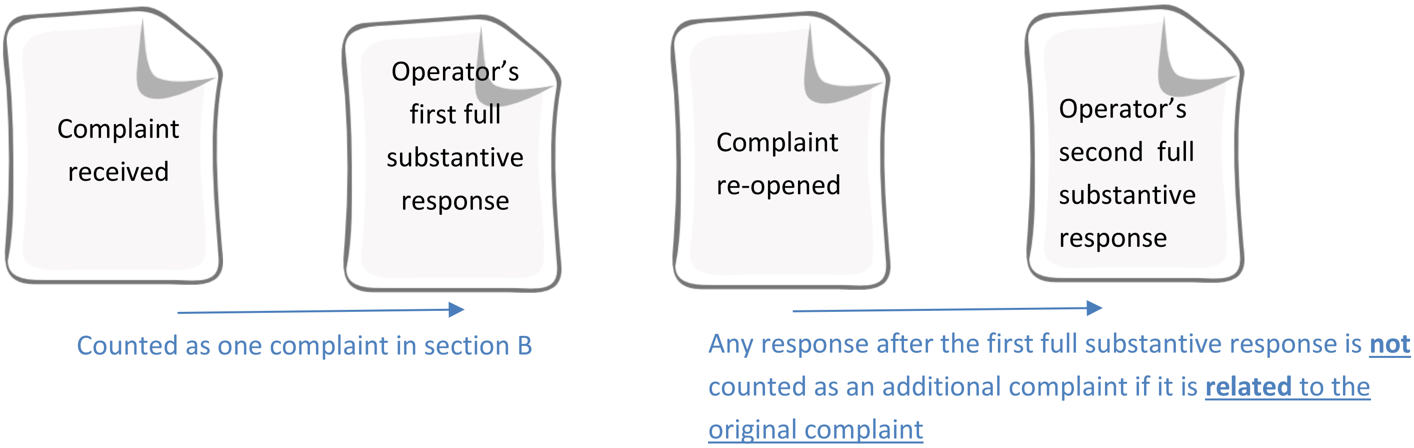
If the complainant is not satisfied with how the complaint has been handled or with the outcome and this results in a 'comeback' which leads the Operator to re-open the complaint, this will **not** count as an additional complaint volume for this part of the report. It is only in circumstances where the complainant makes a new complaint (i.e. materially distinct from the original complaint) that it should be categorised as a new complaint in section B[3].

[3] **The following examples are merely intended to provide an instructive illustration about how to interpret the guidance on comebacks:** In this example the original complaint was about the attitude of staff at station X. If the Operator has sent a first full substantive response but the passenger then comes back and complains that on a different day staff at station Y were also unhelpful, then this should be recorded as a **new complaint** in section B with the subject of the new complaint also logged in section A. In contrast, the comeback would be considered '**related'** to the original complaint if it was expressing the complainant's dissatisfaction about how long it took for them to receive a response to the original complaint. This would mean the complaint is re-opened but the additional complaint about the response time would only be recorded in section A, with no additions made to section B.

Reporting example

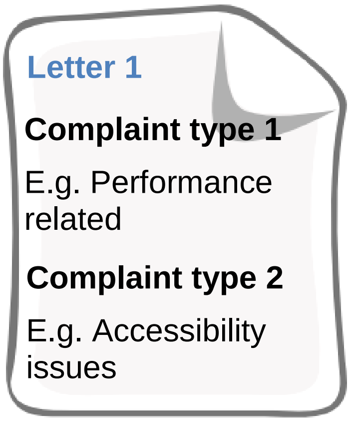
The Operator receives a complaint and makes a first full substantive response. The complaint is then re-opened.

Figure 1: example of how to record complaint volumes



Multiple complaint types in one correspondence

If there are multiple complaint types within a single complaint correspondence, this should be recorded once within section B (see figure 2 below). This is because section B records the number of complaint correspondence closed. See figure 4 for how this should be counted in section A.



This complaint correspondence contains a complaint on both the punctuality of the journey and on accessibility issues. This will be counted as one complaint within section B.

(It will be recorded twice in section A – see figure 4)

The complaint will be recorded in section B in the following way:

Metric	Contact method	P1	P2	P3
Total number of complaints closed	Total number of complaints closed	1		

Percentage of complaints responded to within 20 working days (row 6)

Metric	Contact method	P1	P2	P3
Percentage of complaints responded to within 20 working days	All contact methods (%)			

Response times are based on complaints closed

Response time to complaints are based on those **complaints closed** during the period (of those reported in row 7).

First full substantive response times reported only

Response times are based on when the complaint was received by the Operator, to when the Operator issued the first full substantive response to the complaint (see page 6 for a definition).

Correspondence following the first full substantive response

Further correspondence with the complainant following the first full substantive response should **not** be counted as part of the response time.

DOs and DON'Ts in calculating the response times:

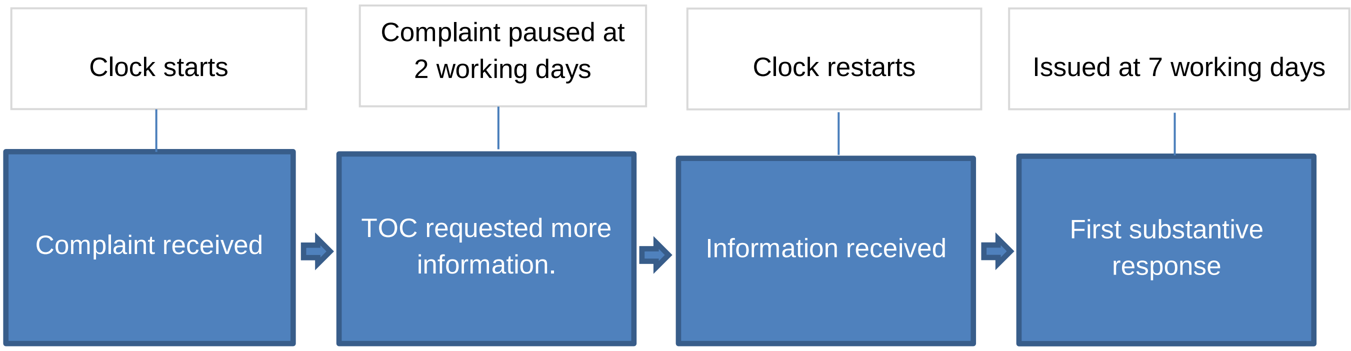
Guidance on how to record response times	Examples of what not to do
✓ Only the first full substantive response is reported. E.g. The first full substantive response takes 15 days, only this 15 days is reported to ORR. Any further correspondence associated with the original complaint is not recorded for response times.	✗ Reporting each response time associated with the complaint separately. E.g. one set of response times for the first full substantive response (e.g. 15 working days), and another set of response times for any further correspondence (e.g. another 10 working days). This should not be recorded as 15 working days, and a separate 10 working days for any further correspondence. ✗ Each response timeframe is added together. E.g. the first full substantive response (e.g. 15 working days), and any other correspondence (e.g. another 10 working days). This should not be recorded as 15 working days + 10 working days = 25 working days

Putting the complaint on hold while waiting for the complainant

The complaint response time should be paused if the Operator is waiting for the complainant to reply e.g. to provide the Operator with more information to enable the complaint to be investigated.

If the complainant does not respond then the complaint can be closed at the date when the Operator replied asking for more information. To that end, Operators should therefore make it clear to the complainant the timeframe within which they would expect the complainant to respond by.

Figure 3: how to record complaint response times when waiting for the complainant to respond



Response time is calculated in the following way:

A: From the date the complaint was received to the date the Operator asked for more information required to fully respond to the complaint = 2 working days.

B: From the date the Operator received the requested information from the complainant to replying with the first full substantive response = 5 working days.

Response would be calculated as: A + B

2 + 5 = **<u>7 working days in total</u>**

This would count as one complaint.

Response times are based on working days

The number of days to answer a complaint is to be reported in working days only, and therefore excludes weekends and bank holidays.

Data format for response times

The percentage of complaints responded to should be provided to at least two decimal places.

3. Section A: complaints by complaint category

Section A categorises the type of complaints which were closed in section B. This section records data concerning the following CHP indicator:

- **Total number of complaints by complaints category (this must include a category for accessibility complaints and complaints handling).**

Level 1 Category	Level 2 Category	P1	P2
All Contact Methods	Accessibility issues		
All Contact Methods	Complaints handling		
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			
All Contact Methods			

Complaints on accessibility issues and complaints handling must be reported

Operators should submit their own complaint categories below

Recording complaint categories

Each cause for a complainant's expression of dissatisfaction (complaint type) within a complaint correspondence should be recorded in section A, as indicated by figure 4 below:

Figure 4: example of a letter complaint recorded in section A

In this example there are two complaint types within a correspondence.

Complaint type 1

E.g. Accessibility issues

Complaint type 2

E.g. Performance

Within section A this will be categorised twice. Once under 'accessibility', and once under 'performance'.

The complaint will be closed when both complaint types are fully responded to with no outstanding actions.

Section A will therefore be completed as below:

Level 1 Category	Level 2 Category	P1	P2
All Contact Methods	Accessibility issues	1	
All Contact Methods	Complaints handling		
All Contact Methods	Performance related	1	

See figure 2 for how to record this complaint within section B.

Mandatory complaint categories

There are two mandatory categories that must be submitted. These categories are **accessibility issues** and **complaints handling** and for this reason have already been self-populated within the template.

Inserting your own complaint categories

In order to reduce burden on licence holders the remaining complaint categories will be collected based on the licensee's own categories. The licence holder should populate the rest of the section A table with their own complaint categories[4].

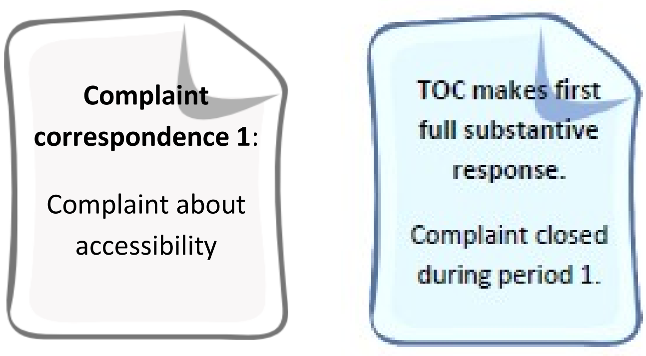
Complaints that have been re-opened

If the complainant is not satisfied with how the complaint has been handled or with the outcome then the complaint will be re-opened. When the Operator responds with the next substantive response, the complaint type(s) will be categorised in section A in the period the Operator sent the next substantive response. Please note, the re-opened complaint will **not** count as a complaint volume in section B (see section 2).

Recording re-opened complaints

The following example (figure 5) shows how a complaint should be categorised in section A following the first full substantive response, and then for further substantive responses.

Figure 5: how to classify complaint comebacks in section A

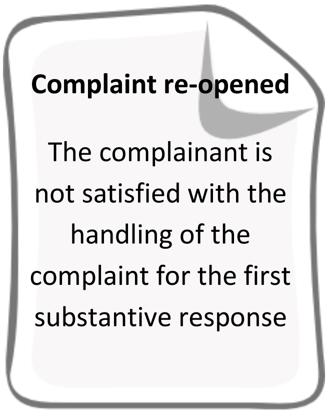


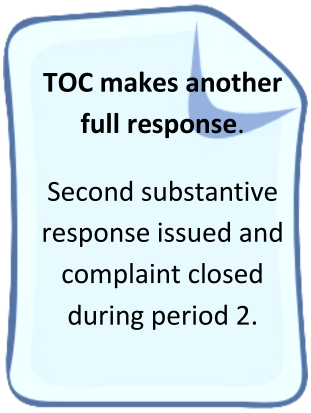
Complaint received in period one. TOC gives first full substantive response in period one.

In this example, the complaint will be categorised under accessibility for period one.

[4] To be clear, all licensees are required to have dedicated complaint categories for both **accessibility-related complaints** and **complaints about the complaint handling process**. Beyond these two compulsory categories, licensees are permitted to insert their own complaint categories currently in use and the corresponding volumes next to each in the table.

Level 1 Category	Level 2 Category	P1	P2
All Contact Methods	Accessibility issues	1	
All Contact Methods	Complaints handling		





Complainant is unhappy with the response and replies in period 1.

The operator re-opens the complaint in period one, and makes a second substantive response in period two.

The operator will categorise the re-opened complaint in section A under *complaints handling* for period two.

Level 1 Category	Level 2 Category	P1	P2
All Contact Methods	Accessibility issues	1	
All Contact Methods	Complaints handling		1

Difference between sections A and B

The number of complaints in Section A should be higher than or equal to section B. This is because each complaint recorded in section B should be classified at least once within section A[5].

[5] Again, this is because a single complaint correspondence (e.g. a complaint via email) will have one or more issues that the complainant is expressing dissatisfaction with.

4. Section D: volume of assisted journeys

This section records the detail on both booked and unbooked assisted journeys. It covers the following Disabled People's Protection Policy (DPPP) indicator:

- **Assisted journeys**

Booked assistance

This section explains how to complete the booked assistance section of the data template. It covers booked assistance completion volumes, incomplete booked assistance volumes and reasons for the incomplete assistance.

Metric reference	Type	Metric	P1
A	Booked	A). Volume of booked assistance	
B	Booked	B). Volume of booked assistance completions	
C	Booked	C). Volume of booked assistance incomplete , and reasons for each incomplete assistance (below)	
Ci	Booked	i) No space on train	
Cii	Booked	II). No staff available	
Ciii	Booked	iii). Disruption	
Civ	Booked	iv). Passenger did not arrive/ arrived too late for service	
Cv	Booked	v). Other	

A) Volume of booked assistance

This is the volume of booked assistance requested. This figure will be the sum of both metric B – volume of booked assistance completions, and metric C – volume of booked assistance incomplete. For example, if there were 20 booked assistance completions, and 5 booked assistance which were incomplete, then the total for metric A would be 25 volume of booked assistance.

This figure, as with all figures in Section D, should also be an aggregated total for all the licensee's stations or services.

B) Volume of booked assistance completions

The volume of booked assistance successfully within the specified Rail Period.

- This is a <u>single figure for the Operator i.e. an aggregate of all booked assists delivered successfully by the Operator across all its services within the specified period (including both trains services and its managed stations).</u>

C) Volume of booked assistance incomplete, and reasons for each incomplete assistance

The reason why the booked assistance has not been provided. The reason for the failure should be categorised as follows:

i. No space on train
ii. No staff available
iii. Disruption
iv. Passenger did not arrive / arrived too late for service
v. Other

Unbooked assistance

This section explains how to complete the unbooked (Turn Up and Go) assistance section of the data template.

D	Unbooked	D). Volume of unbooked assistance (Turn Up and Go) requested	
E	Unbooked	E). Volume of unbooked assistance (Turn Up and Go) completed	
F	Unbooked	F). Volume of unbooked assistance (Turn Up and Go) incomplete, and reasons for each incomplete assistance (below)	
Fi	Unbooked	i) No space on train	
Fii	Unbooked	II). No staff available	
Fiii	Unbooked	iii). Disruption	
Fiv	Unbooked	iv). Passenger arrived too late for service	
Fv	Unbooked	v). Other	

D) Volume of unbooked assistance (Turn Up and Go) requested

The volume of unbooked assistance requests received by the Operator from passengers within the specified Rail Period. The volume of unbooked assistance requested should equal the volume completed (item E) plus the volume incomplete (item F).

- This is a <u>single figure for the Operator i.e. an aggregate of all booked assists delivered successfully by the Operator across all its services within the specified period (including both trains services and its managed stations).</u>

- We do not require this reported at station level.

E) Volume of unbooked assistance (Turn Up and Go) completed

The volume of unbooked assists actually carried out by the Operator within the specified Rail Period.

- This is a <u>single figure for the Operator</u>

- We do not require this reported at station level.

F) Volume of unbooked assistance (Turn Up and Go) incomplete, and reasons for each incomplete assistance

This is the volume of unbooked assists that were requested by passengers but were unable to be fulfilled by the Operator and the reason for each incomplete assistance categorised as follows:

i. No space on train
ii. No staff available
iii. Disruption
iv. Passenger arrived too late for service
v. Other

5. Section E: measuring continuous improvement in complaint handling

This section records the top five key areas passengers have complained about, and what the Operator is doing to address those issues.   This is an annual submission due with period 13 reporting to ORR and meets the requirements of the following indicator:

- **Continuous improvement in complaint handling**

<table>
<tr><th>Complaint category</th><th>P1-P13 volume (taken from section A of complaints template)</th><th>Commentary -</th></tr>
<tr><td>Example of complaint topic (level 2 cateogry):
Provision of information covering section A/NRPS categories on: Provision of information about train times/platforms | Provision of information on website or mobile apps | The provision of information during the journey.</td><td>Section A complaint volumes for each particular category</td><td>Example (to be provided with level 2 or level 3 examples):
TOCs should provide some commentary as to what is driving the volumes of complaints in this category and explain clearly what actions they have made to address them, and what effect that has had. E.g. 'in May 2015 we noted an increase in the volume of complaints regarding the quality of information on our website and mobile apps. We brought in a specialist team to examine these issues and we made changes to our information channels which have had the following effect....'.</td></tr>
</table>

The complaint category, as recorded in section A of the reporting template

The volume of those complaints

Please provide further detail within the commentary.

Top five key areas

Operators to provide detail on the following question:

"What are the top five <u>key</u> areas passengers have complained about in the past year and what action are you taking to address them?"

By ‘key areas’ we mean service issues clearly within the Operator’s area of responsibility (i.e. not issues clearly caused by another Operator or a third party beyond your control, such as Network Rail).

Section A complaints

The volumes of complaints should be taken from section A.

Complaints outside the Operator's control

Complaints about delays to services caused by Network Rail engineering works, or issues directly related to the actions of another TOC, are reasonably beyond the Operator's control and so should be excluded from being reported under this indicator.

Delays or other types of service failure caused by factors largely attributable to the actions of the Operator (e.g. train faults, staff shortages, cleanliness of the train, staff attitude, etc.) should be reported under this indicator.

Commentary

In the commentary box Operators should include narrative on both successes and failures. ORR recognises that most complainant service improvements are achieved through learning from trial and error and so we are keen to hear of the actions Operators have been taking to seek improvements in complaint handling regardless of whether they delivered the desired outcomes.

Please include:

1. Information that is easily understandable and brief.
2. Show what the problem was, how the Operator addressed the problem (including what they learned from this), and what impact this had.
3. Should relate to the level 3 complaint categories on the template.
4. We assume these will be top 5 areas by volume (in the Operator's control) and will match the volumes in Section A of the template.

Example:

Ticket buying facilities – Smartcards

"The top complaint category in the past year related to complaints about the use of our newly launched Smartcard, with some passengers finding it difficult to find information about how to use the 'top up' function. In P8 the smartcard website area was improved to help passengers understand the Smartcard and how it works: for example, an overview, 'user guide', and improved FAQs were added. By P9 we noted a significant drop in the volume of complaints about this issue leading us to believe it has been remedied by our actions."

6. Section F: Staff who have received relevant disability awareness training or disability equality training

This section records the number of staff who have undertaken disability awareness and equality training, along with details about the training. The number recorded should include both initial and refresher training. This meets the following indicator:

- **Staff who have received relevant disability awareness training or disability equality training**

Metric	P1-P13 (number of people)	Commentary on volumes (*optional*)
Disability awareness and equality training		

a) Who has been trained and how often? Provide details on type of staff and numbers.

This should include information on the types of staff who have had training - for example, passenger-facing staff, staff who deal with complaints, managers who are responsible for policy decisions etc. It should also say whether it was initial training or a refresher. If any of the training was refresher training, please state whether or not this was part of the training plan or delivered in response to feedback/complaints or policy changes.

b) Do you have dedicated disability awareness and equality training or is it part of general training?

The most useful things to know here would be:

1. Information about dedicated training - for example is training part of a general induction or dedicated only to disability awareness and equality policy and practice.

2. The reasons why the training took place. E.g. are all frontline staff required to have dedicated training to enable them to provide assistance to disabled passengers, or perhaps there is a requirement for all contact centre staff to learn how to communicate with people with different disabilities, etc.

3. What is the nature of the training? For example, is it equipment training, training for mobility assistance, communication training, or training aimed at helping staff interact with or assist people with specific types of disabilities, etc.?

4. Some Operators run initiatives alongside representative groups such as RNIB - this would be a good place to highlight these initiatives.

5. We are also aware[6] that Operators have formal vs informal training which we are keen to hear about. Formal training may be considered as a tailored course run on a pre-planned cycle vs informal training which may arise through staff sharing insights, knowledge or experiences informally at staff briefing sessions, etc. (e.g. employee X may have encountered a passenger with assistance needs he had never experienced before and was given an opportunity to share this learning with colleagues). Could also say here how many times disability issues have been highlighted to staff (e.g. through a newsletter or a briefing).

c) Who delivered the training? (in-house or specialist third party?)

Provide details of the training provider and also why they were selected (e.g. because they have particular expertise in this area). ORR also want to know here what the aims of the training were and how the Operator measures whether or not the aims have been met?

d) What resources (e.g. training materials) are used?

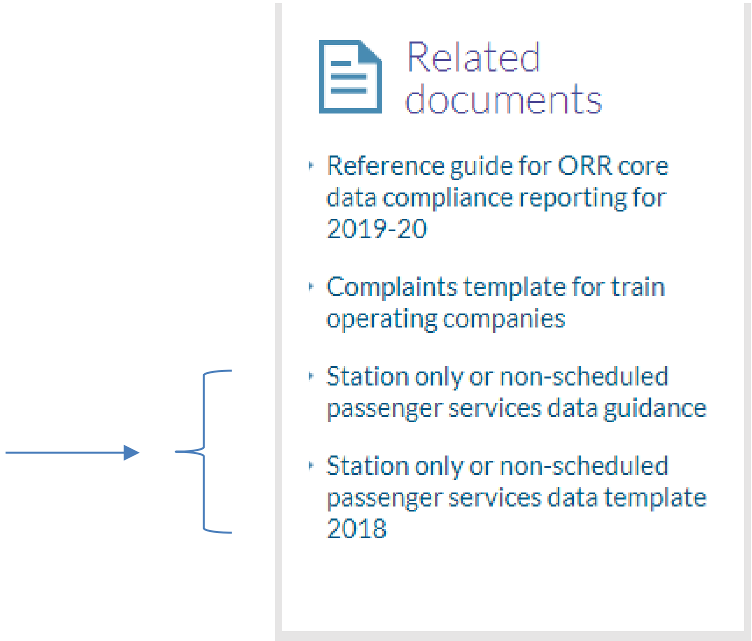
Here it would be useful to know if the training was practical or classroom based. E.g. was it experiential training where staff experience what it is like to be assisted? Or did it take a different form?

What types of resources or training materials were used?

[6] Discussed at 29 June 2015 workshop

7. Sending the data to ORR

ORR request that the data are sent to rail.stats@orr.gov.uk after rail periods 7 and 13. The dates are found in the template provided to each operator and can be found on our Core Data webpage.



It is essential that the template is used and no modifications are made to it as the data are uploaded directly to our data warehouse and any changes to the format of the template will result in an error when it is uploaded.

Commentary on trends

We welcome any comments you have which describes changes in your complaints data. For example, if the complaints has increased or decreased, any impact on percentage of complaints responded to, and type of complaint. We will use this information to explain trends within our statistical release.

Help and support

For any enquiries please email rail.stats@orr.gov.uk

Annex A – summary of Core Data requirements for station only or non-scheduled passenger services

CHP Indicator	Regulatory obligation	Comments
Total number of complaints received (section B)	CHP guidance – section 4.1, ORR's monitoring approach	Data is collected on a periodic basis, reported to ORR twice yearly and published by ORR
Percentage of complaints responded to within specified targets (section B)	CHP guidance – section on response times, para 3.31 and 3.32	Data is collected on a periodic basis, reported to ORR twice yearly and published by ORR
Total number of complaints received by complaints category (section A)	CHP guidance – section 4.1, ORR's monitoring approach	Data is collected on a periodic basis as per licensee's categories, but must include a category for accessibility complaints and a category for complaints about the complaints handling process. Reported to ORR twice yearly and published by ORR
Continuous improvement in complaint handling (section E)	CHP guidance – para 1.7 and 1.8 regarding continuous improvement. Requires evidence of a good complaints handling procedure that leads to continuous improvement so that in the medium term the root causes of complaints are addressed and systemic solutions are put in place	Data on the top five causes of complaints (i.e. what passengers complained about) is collected on a one-off annual basis and reported in section E of the reporting template

DPPP Indicator	Regulatory obligation	Comments
Staff who have received relevant disability awareness training or disability equality training (section F)	DPPP guidance – para D6 on staff training	This data is collected on a one-off annual basis and reported in section F of the reporting template
Assisted journeys (section D)	DPPP guidance – para C2 on assistance for passengers	The number of requests (booked or unbooked where they are relevant to the licensee) made for assisted travel received by the licensee. It will also require them to report on the number of these assisted travel requests that have been met (delivered). Where an assistance request has not been met the licensee will also have to explain the number of instances in which this has occurred and the reasons for each failure. Data is collected on a periodic basis and reported to ORR twice yearly and published by ORR.

Notes:

1. Periodic reporting: Periods 1-7 and 8-13, with data disaggregated by Period

Annex B: Periodic quality assurance checks

Below are the quality assurance checks ORR carry out on Operators data every period.

Section B:

B1). Total number of complaints closed (row 7) must be less than or equal to tab Section A Grand total.

Section D:

D1). Volume of booked assistance (row 6) should equal the sum of booked assistance completed (row 7) and volume of booked assistance incomplete (row 8).

D2). Reasons for each incomplete booked assistance (row 9 to 13) should sum up to the volume of booked assistance incomplete (row 8). If this does not match (for example an assistance has more than one failure reason), please provide information in the commentary box.

D3). Reasons for each unbooked assistance (row 17 to 21) should sum up to the volume of unbooked assistance incomplete (row 16). If this does not match (for example an assistance has more than one failure reason), please provide information in the commentary box.

D4). The volume of unbooked assistance requested (row 14) should sum to the volume of unbooked assistance completed (row 15) plus the volume of unbooked assistance incomplete (row 16).

This publication is available at: orr.gov.uk.

Any enquiries regarding this publication should be sent to us at orr.gov.uk/contact-us.