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15 March 2016

Louise Ebbs Strategic Planning Manager TransPennine Express

Dear Louise

Approval of First TransPennine Express Limited (Trading as TransPennine Express) Complaints Handling Procedure (Condition 6 of the Station Licence and 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.

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 Passenger Statement of National Regulatory Conditions (SNRP). We also sought views on your draft CHP from Transport Focus.

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

• Your 'Back on Track' scheme with a fund to allow staff to give compensation or free upgrades in order to rectify complaints on the spot.

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 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 ATOC and the Department for Transport as to the

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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 ATOC.

You have informed us that you are creating a new complaints page on your website that will be available from 1st April 2016. You have stated that there will be a clear route to complain, along with separate routes to give other feedback, which will be 2 clicks from the home page. You have also stated that the complaints page will include a summary of your complaints handling service standards including response times, contact routes and information on what to include in complaints. Please could you inform us when these are available to view and in any case no later than 1st April 2016.

You have informed us that due to changes to your social media team, a new social media policy will be produced after the start of the franchise to reflect the team's changed role. This revised social media policy should be available within 6 months of the start of the franchise and should be submitted to ORR by no later than 1st October 2016.

In the case of TransPennine Express, the relevant passenger body is Transport Focus. 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 are not yet finalised and are currently in the process of being agreed. Once these protocols are agreed, we expect licence holders to abide by them in their handling of appeals.

Yours sincerely

Annette Egginton



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TransPennine Express

Complaints Handling Procedure

Customer Information

April 2016

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1 Introduction

TransPennine Express is committed to delivering a high quality customer contact experience at all points, from when you start planning your journey, all the way through to any feedback you want to give us after the journey. Our staff are trained and encouraged to have a positive and helpful attitude, responding promptly and constructively to issues as they occur and encouraging feedback.



We recognise that sometimes things will unfortunately go wrong, and, whether failures are the fault of TPE, our suppliers or other rail businesses, or about company or industry policy, our Complaints Handling Procedure makes sure that customers get an explanation and insight into the reasons for any failure, and a clear view of how to comment or complain, what to expect in return and when, and their rights to compensation.

Our customers contact us in writing, by phone, by email or by social media, for a whole range of reasons from asking for facts and information, to thanks for good service, to complaints. We record every contact, positive or negative, and make sure that any expression of dissatisfaction is recorded as a complaint and is handled in accordance with the standards in this procedure. We use every complaint in comment in our management information systems to help us to improve our services.

TransPennine Express believes that having a caring after-sales service will not just retain customers and reduce the number of dissatisfied customers but will win new business.

Our Customer Promise

Our promise is that the people you come into contact with before your journey, during it and after it will be empowered to deal with any problems that arise. If you still have a complaint, we will help you to complain. We will take your complaint seriously, respond promptly and give you full and fair compensation whenever you are entitled to it.

This Complaints Handling Procedure explains how to complain, what we will do with your complaint and the service you can expect to receive from us. This includes:

- How to get help at the moment that things go wrong
- How to contact us to complain and what to tell us
- How we make it as easy as possible for you to complain to us
- How we will respond to your complaint and when you will get an answer
- How we will deal with your complaint fairly
- When you can expect compensation
- How we will protect your confidentiality, and
- How we will monitor and review all the comments you give us
- How we feedback information to management so we can make improvements.

2 Helping you during your journey

When things go wrong during your journey, we want to put it right then and there, if possible. Our staff have hand-held mobile devices with the latest information to help you manage your journey and our Customer Relations centre and social media teams are also available to help. All our staff on trains and stations have 'Back on Track' forms so that they can give you vouchers to smooth things over when things go wrong - this can be for anything such as booking a taxi to simply getting a free cup of coffee during service issues.

If you have used Back on Track or had other help to resolve problems when they happen, please get in touch with us to tell us about it - not least because that way we'll understand the problem that arose for you so that we can try to prevent it happening to someone else.

3 Talk to us

We want to hear your views and thoughts, so we have lots of low effort ways for you to get in touch with us:

telephone: 0345 600 1671 from 06.00 to 23.00 seven days a week including Bank Holidays, except Christmas Day and closing at 18:00 on Boxing Day, New Year's Eve and New Year's Day. (When Customer Relations is closed, a recorded message will tell you the opening times and other ways to contact us.)

email: tpecustomer.relations@firstgroup.com

write: Customer Relations, TransPennine Express, Freepost, ADMAIL 3878, Manchester,

M1 9YB

On social media, via Twitter (24 hours): @tpeassist and via Facebook

Fill in our contact form at www.tpexpress.co.uk/help

Collect a 'Your Views' form from any of our stations on the trains or print it out from: <u>www.tpexpress.co.uk/help</u> (if you send us something on Your Views that is an expression of dissatisfaction, we'll record it as a complaint and let the manager responsible know so that we can improve our services).

Apply for Delay Repay by picking up a form from our stations or following the link at <u>www.tpexpress.co.uk/help</u>

Our dedicated Assisted Travel Team helps passengers with additional needs, such as disabilities. They can book someone to meet you at the station and see you safely onto the train and again at your destination and if you are changing trains. Freephone 0800 107 2149 from 06:00 to 23.00 seven days a week, including Bank Holiday, except Christmas Day and from 08:00 to 18:00 on Boxing Day, New Year's Eve and New Year's Day). Please see our Assisted Travel offer and our Disabled People's Protection Policy at www.tpexpress.co.uk/assistedtravel.

Pick up a 'contact us' card at the station or from the conductor on the train - it has all this information, including where to claim compensation for delays.

All our stations display a poster and each carriage on all our trains displays a notice, giving the contact details for our Customer Relations Team and for Transport Focus, the independent transport watchdog, to whom rail customers can appeal for resolution of disputes between themselves and any rail company. This information is also published in our timetables, on our website at <u>www.tpexpress.co.uk</u> and in our Customer Reports which are printed twice a year to let you know how our services are performing, what we've done to improve things in the past six months and our future plans. We also use our marketing campaigns as an opportunity to invite customers to give us their feedback.

Our Delay Repay Compensation, Customer Complaint and Comment forms and Passenger's Charter are available <u>www.tpexpress.co.uk/help</u> and at all stations where our trains stop, as well as from Customer Relations. We can provide these in audio, large print, Braille or Easy Read on request.

Join in our Customer Engagement Events

We hold regular open sessions for customers and stakeholders across our network, which give customers the opportunity to ask questions, raise issues or make a complaint in person with our Directors and Senior Managers. These events will be advertised at the station at least one week in advance and will be promoted by our Twitter feed @tpexpresstrains. Further details of the locations and times of the events can be obtained from our Customer Relations Team.

We have a Customer Consultation Forum, so that we can get views directly from our passengers. This is an online membership group which has occasional meetings to discuss

questions about our services. Our Accessibility Consultation Forum is a special group for people who have all the usual questions about travelling by train but also some more - some because they are disabled or elderly and others don't have English as a first language - and again we consult online and occasionally in meetings. To ask about joining one of these groups, please email our Customer Relations Team.

4 What to tell us

To help us understand your complaint properly and respond to it completely, please tell us:

- your name and contact details;
- information on the service you are complaining about like the time and destination of the train;
- the reason for your complaint;
- a description of the problem and inconvenience caused;
- what you want us to do, and
- and please give your booking reference and a copy of your tickets if you are looking for compensation.

For lost property, please phone our Customer Relations team or visit the website at <u>www.tpexpress.co.uk/help</u>

If you wish to make a claim against TransPennine Express for losses, property damage or personal injury this should be made in writing to Customer Relations who will ensure it is forwarded to TransPennine Express's claims handlers. Your claim will then be dealt with in accordance with the Claims Allocation and Handling Agreement (CAHA) (please contact our Customer Relations Team for more information on this).

5 What response you should expect from us

When you complain to us, our aim is to resolve it for you the first time you contact us.

We have a specially trained team of Customer Relations advisors dedicated to dealing with your comments and complaints. They will

- give you a personalised response, tailored to the circumstances of your individual complaint;
- use clear, jargon-free English with correct spelling, grammar and punctuation;
- address all issues raised in your query.

Whenever possible, your complaint will be handled by one member of the Customer Relations Team, from receipt to reply, and it will address each of the points you raise. We will respond to your comment or complaint as quickly as possible. It's easier for us to handle some types of query than other, so we will respond to:

- 90% of email enquiries within 24 hours and 100% within 3 days;
- all postal enquiries within 5 working days;
- all simple complaints within 3 working days;
- all complex complaints within 5 working days; and
- answer 75% of telephone calls within 30 seconds if we cannot resolve your complaint over the phone, we will write to you in the timescales above.

We are updating our systems, so that, by September 2016, we will:

- answer 80% of telephone calls within 20 seconds;
- process 100% of Telesales and Web refunds within 5 working days (see our Passenger's Charter at <u>www.tpexpress.co.uk/help</u> for your full compensation rights).

A simple complaint could be one regarding an incident we are already aware of. More complex complaints are those which require further investigation, for example where the complaint is regarding several issues or an incident that we do not already have information on. On occasion complex investigations might take longer to provide full resolution, but in these circumstances we will ensure that your are told within 3 working days that it is a complex complaint, send you a response within five days and update you regularly on the status of your complaint if it requires further investigation or action. We will give you a full answer within 20 working days.

If these timescales cannot be met because there is a sudden and unexpected rise in the number of complaints - for example in the case of extreme weather or of major infrastructure damage - we will publish variance targets and we will inform our Regulator the ORR and Transport Focus, your independent passenger watchdog.

If your complaint is wholly or partly about another operator's services, Network Rail or other agencies, we will pass the complaint to them within the response times shown above, if you give us permission to do so. We will get in touch with you to tell you who is now dealing with your complaint. More often than not, though, we can help with all of your complaint, whatever the cause – for example if you are heavily delayed on one of our trains because of a Network Rail signal failure, we will pay you compensation and then go back to Network Rail through our industry processes.

If you can't speak or read English well, we can arrange for your complaint to be handled in your own language.

We aim to respond and apologise to all our customers whether they complain in person, by letter, telephone, email or social media. We also aim to apologise to customers who have not complained but who have suffered serious disruption or an unpleasant experience on their journey with us:

- through poster notices and public address announcements at relevant stations.
- using announcements and visual messages on-train or in exceptional cases by distributing letters or notices on-train.
- through the press and media where appropriate.

If you complain via social media, we will try to help you on the spot. If, however, your social media complaint requires a fuller answer, we will signpost you to this complaints process and our online complaints form. If any of your comments on social media express dissatisfaction, even if you haven't filled in a complaints form we will include these in our

complaints logging along with all other complaints and feed them back to the appropriate manager for action. Our social media team are available 24 hours a day. We aim to respond to all tweets that ask for a response and to many that don't.

Compensation

Even if you don't ask for it, we will offer compensation when appropriate. You are entitled to compensation when you are delayed for half an hour or more, as explained in our Passenger's Charter <u>www.tpexpress.co.uk/help</u>. Copies of the Charter can be obtained at all stations which we manage, online at <u>www.tpexpress.co.uk</u> and are also available on request from Customer Relations, in standard print, large print, audio, Braille and Easy Read. We may also consider compensation as a goodwill gesture on an ex-gratia basis if we think that we haven't been able to fulfil our normal service promise to you.

In the event of extensive serious disruption, a member of the TransPennine Express team may process compensation on the spot where appropriate, using our Back on Track process so that you don't have to contact our Customer Relations Team. This does not replace your rights to formal compensation under our Passengers Charter.

6 A Fair Complaints Procedure

We aim to satisfy your complaint with our first response and we will always apologise when we should.

We will have a full and fair investigation of each customer comment and complaint. We will involve management and senior management where appropriate to ensure that we take a consistent approach to similar complaints.

There are seven steps in our process for ensuring fairness:

Analysis of your complaint, to make sure we identify all the elements in it and any facts to be checked

Evidence gathering: we will look at service records, and compare what you experienced with what our policies promise you should experience - if we need more information from you, we will ask for it

Corroboration and analysis: an objective review of all the evidence including talking to any staff involved

Sum all this up to compare what happened to you with what should have happened

Understand the reasons why it happened, so that we can explain it to you, as well as apologising

Send you a response which as far as possible resolves your complaint in full

Monitor our work, checking that the responses have gone through all these

stages and meet these standards of fairness

If you are unhappy with our first response and contact us again about it, a manager will review your complaint. A second response in writing will include the name and position of that manager and also explain the role of Transport Focus, the independent transport watchdog.

If you remain unhappy in relation to your complaint, you can contact us again or contact Transport Focus. Transport Focus is an independent body set up by Parliament to protect rail and road users' interests. The organisation is able to review your complaint and make representation to us on your behalf. Our Contact Details section, below, tells you how to get in touch with Transport Focus.

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' organisation for your complaint. In our case this is The Consumer Ombudsman <u>www.consumer-ombudsman.org</u>. However, as Transport Focus already provides 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.

All appeal cases will be reviewed by the Customer Relations Manager. We will investigate appeals raised by Transport Focus and will endeavour to respond within 5 working days. If a detailed investigation is needed we will ensure we provide a full response within 10 working days, or if your case is very complex we will agree a longer response time with Transport Focus. Once you have raised an appeal with Transport Focus, we are required to stop all correspondence with you until Transport Focus has resolved the appeal. This does not, of course, stop you contacting us about other issues.

TPE reserves the right to terminate any correspondence or communication that could be construed as abusive or bullying in content, voluminous, frivolous or vexatious, or which specifically diverts resources and affects the customer relations area operation. We will consult the ORR (Office of Rail and Road – our Regulator) and Transport Focus before we terminate any correspondence and we will advise you in writing of the reasons behind the decision. You will still be able to appeal to Transport Focus.

7 Confidentiality

This procedure will ensure that your confidentiality is protected.

- 1 Your personal details or details about your complaint will not be divulged to third parties unless we have your written consent.
- 2 We will ask you if we can pass on some or all of your details for quality control. This is because our Regulator, the ORR, audits our work and they and your watchdog, Transport Focus, carry out research into customer satisfaction with complaints. Only a sample of complaints is audited, so if you tick the box that says we can share your details you may not be contacted again.

3 We will also ask you if we can pass on some or all of your details to a third party in certain circumstances. For example, we would usually like to share complaints about personal safety with the British Transport Police. We may want to consult other train operating companies, Network Rail, Transport Focus, or other suppliers or agencies about your complaint.

If you can't make a complaint yourself but want your carer, support worker, guardian or other agent to act as your advocate, we can arrange this whilst still protecting your data confidentiality and theirs.

For more information on how we store, handle and use your data, and how you can get access to any data we hold about you, please see our privacy policy at <u>www.tpexpress.co.uk/footer/privacy-policy/</u>. You can also ask Customer Relations for a copy of this. This privacy policy makes a commitment to you that your data will always be protected according to the Data Protection Act, within the permissions you have given us.

8 Monitoring and Reporting

Customer feedback is important to us. It helps us to identify areas where we can improve the service we provide.

To ensure that this feedback helps to drive improvements:

- 1 We will provide regular reports, every four weeks, on complaints trends to managers at all levels to enable them to identify areas in need of improvement and to take remedial action.
- 2 We will submit reports every four weeks to our Customer Service Management Group where senior managers review our performance in handling complaints in terms of speed of response and satisfaction ratings of customers who have complained.
- 3 We will send specific reports to managers in each service area so that they can use complaints (and compliments) to improve our performance and satisfy our customers. For example, when we get a lot of compliments about the helpfulness of conductors on a part of our service, it helps the other Area Managers know what to aim for. And if we get complaints about the maintenance of a train or station, they are sent to the responsible manager.

We will provide information on the number of comments and complaints we receive, and our performance in dealing with them and we will make all these data available to our Regulator the ORR and to Transport Focus and Rail North/DfT.

Calls to the Customer Relations team are monitored to make sure that your complaint is handled in a friendly, personal and appropriate manner. Each member of the team has their work audited every month, to check that they are meeting the standards set, in calls, letters and emails.

We undertake quarterly surveys with a sample of our customers who have contacted us, in order to measure customer satisfaction with the way our Customer Relations Team has performed. We will use this information to improve the team's performance.

We monitor the number of customers who contact us again because they are unhappy about the way their complaint has been handled, on a four-weekly basis. We will identify the reasons why customers are unhappy with the way their complaint has been handled and seek to improve this.

Our Complaints Handling Procedure will be reviewed each year and this will be carried out in consultation with Transport Focus and Rail North. This Complaints Handling Procedure will not be altered without prior consultation with these bodies and prior agreement from the Office of Road and Rail.

Contact Details

TransPennine Express Customer Relations Team

Telephone: Textphone users: Fax: E-mail: Webform	0345 6001671 0345 600 1673 0345 600 8363 tpecustomer.relations@firstgroup.com www.tpexpress.co.uk/contact-us
Assisted Travel:	Freephone 0800 107 2149
Letter:	Customer Relations Team TransPennine Express ADMAIL 3878 FREEPOST Manchester M1 9YB
Transport Focus	web: <u>www.transportfocus.org.uk</u> email: <u>advice@transportfocus.org.uk</u> tel: 0300 123 2150 Freepost RTEH-XAGE-BYKZ Transport Focus PO Box 5594 Southend on Sea SS1 9PZ

TransPennine Express Customer Complaints Handling Procedure Policy Document April 2016

1 Introduction

TransPennine Express is committed to delivering a high quality customer contact experience at all touch points, from journey planning to our relationship after the journey. Our staff are trained and encouraged to have a positive and helpful attitude, responding promptly and constructively to issues as they occur and encouraging feedback.



Our Complaints Handling Procedure (CHP) is designed as a system, capable of evolution as technologies and customer expectations change during the franchise. The system is built on an organisational culture which has been set up with customer and stakeholder engagement at its heart.

This policy document supports the customer-friendly core of the CHP. It explains our organisational culture and people, processes and structure to deliver the CHP and its feedback mechanisms and response. The customer document is published on our website at www.tpexpress.co.uk/help

2 Organisational Culture

TPE has solid foundations and structures to help us deliver continually increasing quality of service and satisfaction. We have identified four key areas within the building blocks identified in the diagram:

- an organisational structure focused on improving the quality of service and satisfaction of customers;
- governance arrangements that ensure we deliver against the expectations of our customers;
- a clear set of customer service standards across all the customer journey touchpoints; and
- a customer focused culture embedded at every level of the organisation.

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The customer focused culture is being co-created with staff and is continually under review and development through feedback, mentoring and training.

3 People

TPE has a Customer Relations Manager reporting to the Customer Experience Director. The Customer Relations Manager leads the in-house team and is the client for the Service Level Agreement with the Customer Relations Team at our UK based Contact Centre. Complaints are handled initially by the Customer Relations Team at the Contact Centre under the terms of the SLA, but repeat or follow-up complaints are taken in-house and are escalated as appropriate. Complaints referred to Transport Focus are reviewed by the Customer Experience Director.

Our people on the ground are empowered to resolve issues on the spot and pre-empt complaints, through our Back on Track system by which staff can issue vouchers for customer help from a free coffee to a taxi fare.

Our service contract requires the supplier to train and empower customer service teams to:

- identify and address all the points in a complaint, since a focus on first time resolution reduces follow-up complaints and the need for a subsequent response;
- make good use of appropriately worded standard paragraphs, but taking care to amend or supplement these with bespoke responses, to meet every point in the customer's complaint or experience.

4 Processes

On-station and on-train

TPE colleagues are empowered to resolve customer complaints at the earliest appropriate opportunity and can issue on the spot compensation in the form of vouchers or upgrades for our services using our Back on Track scheme. We aim to use this process wherever customers have become dissatisfied with the service we have provided so that they do not need to take time to complain. If the issue is complex or requires further investigation and/or compensation over £50, the customer will be referred to our Customer Relations Team.

Response times

Our customer contact response SLA (Service Level Agreement) will be set from Day 1 to respond to:

- 90% of email enquiries within 24 hours and 100% within 3 days;
- all postal enquiries within 5 working days;
- all simple complaints within 3 working days, and
- all complex complaints within 5 working days.

A simple complaint could be one regarding an incident we are already aware of. More complex complaints are those which require further investigation, for example where the complaint is regarding several issues or an incident that we do not already have information on. On occasion complex investigations might take longer to provide full

resolution, but in these circumstances we will ensure that customers are told within 3 days that their complaint is complex and that they have a response within five days. Where investigations or actions are lengthier, the customer is kept regularly up to date on the status of their complaint. TPE's Case Management System is set up to push regular notifications to customers to keep them updated.

We will publish these commitments in our Passenger's Charter and we will publish our complaints data within our Customer Report and on our website.

Our response SLAs are designed to take into account the channel the customer has chosen to contact us through and the nature of the query.

We will use reasonable endeavours to keep to our promised response rates even when there is an unexpected sudden increase in the volume of complaints being received. However under exceptional circumstances during times of disruption we may publish variance standards and we will inform the ORR and Transport Focus.

Complaints Tracking

TPE has proven mechanisms for identifying complaints from general feedback. From April 1 2016, there will be a separate Complaints form, distinct from our Contact Us (web) and Your Views (paper) forms. All feedback, however, by whichever medium it reaches us, will continue to be indexed against the following categories:

Level 1: complaint / inquiry / compensation / praise / not for us (other TOC/NR, etc.) Level 2: ORR complaint categories

Level 3: More detail on the category, e.g. if 2 is 'on train' then here it might be 'seat' or 'PIS'

Level 4: Further details, e.g. '1: station, 2: praise, 3: Huddersfield, 4: Jim'

This provides the channelling for a full and fair investigation and a complete response. These data are automatically fed into a reporting system, which goes back into the business for action by the Responsible Manager and review at management meetings.

The social media team analyses the sentiment and themes coming through on social media.

When feedback comes verbally from passengers to staff on stations and trains, they are asked to pass it on so that either the Manager or the Station Adopter (members of the public / interested parties) who will feed it directly to the Manager. This informal system is believed to have worked well, but is difficult to audit. From late summer 2016, staff will have a 'Find it and Fix it' app on their handheld mobile devices so that they can report faults directly to the Service Desk and into TOCrm. The faults will be logged as if they had been reported via an inspection and will be resolved subject to the same Service Level Agreements and reported every Period in Management Reports and in the relevant dashboards. From January 2017, this app will be available for Customer use.

5 Training

All Customer Relations staff and all our customer serving staff on trains and stations are trained in the Complaints Handling Policy and to understand the standards they must achieve in dealing with customer complaints.

Our Customer Relations Team training also covers:

- customer service skills
- logging and categorising complaints
- understanding: training to read/listen to be sure to cover all points in the complaint
- investigation
- resolution skills.

The training is refreshed at least annually. Our monitoring systems check adherence to the trained behaviours and standards.

6 Monitoring

Our quality monitoring is carried out by local managers and assured by the Customer Relations Manager. Every period, a minimum of 8 calls and 8 letters per advisor is reviewed for quality both by the Contact Centre Manager and by our internal quality assurance team. Where any advisor's work fails the quality audit, corrective action is taken, such as coaching or training, with follow-up measurement and monitoring.

From 1 April 2016, we will also have in place a 'customer survey' consisting of call backs or recontact to a sample of those customers who have given their permission for recontact, so that we can monitor and improve our performance. Our Contact Centre telephone system offers a intelligent Voice Response Likert Scale survey to every caller to help monitor the quality of response. 5% of customers, telephone, are invited to take part in the fuller recontact survey. Emails and letters from us in response to customer contact include a link to the quality monitoring survey. Customers have fed back that they do not like callbacks: they generally prefer the voice survey or contacting us again.

We are trialling questions relating to the Equality Act Protected Characteristics in the Complaints Form. If customers receive this well, it will enable us to check that all customers are receiving the same standard of service. For the present, it is a trial as some customers have indicated that they would resent being asked these questions when they have contacted us to complain. If the trial is successful, we will consider extending it to other contact forms.

7 Feedback mechanisms and business change

Customer feedback is used to improve delivery at TPE. Annual targets are built into our business planning process to measure numbers and types of complaints and the time taken to resolve them. The management team reviews these figures at our weekly

visualisation board meetings. The visualisation boards are posted in working areas and reviewed by local managers and staff. Targets are set to tackle issues in order to reduce complaints and increase customer satisfaction. We review our progress against these targets every Period at our **Customer Experience** Management Group meeting. This is attended by the Customer **Experience Director and** has management representation from across the business.

Case study: TPE believes that customer complaints are a rich resource which we can use to develop the business. Our processes make use of all complaints. A higher level exercise was carried out to make best use of those customers who regularly devote time to giving feedback on our services. We used TOCrm to identify our most frequent complainers. Twenty of the frequent complainers were invited to come in to meet our managers and talk about their experiences of using TPE. A dozen accepted the invitation and a session was set up. Each complainant was given a room and a support member of staff. The managers came into each room in groups of 8 to 12 and had a conversation to listen to the frequent complainer talk about their realistic aspirations for service on TPE and the ways in which they were frustrated, followed by a g&a. The managers found this invaluable, giving real insights into the customers' perspective of service, as distinct from their operating perspective. The customers felt valued and have signed up to be part of an ongoing Customer Consultation Forum.

The senior leadership team annually refine and review the vision, values and objectives of our business through a structured process of strategy development. There are 19 business objectives in the Business Plan, each with a set target to drive improvement. The KPI areas are based on the EFQM model to ensure there is a balance approach to reporting across the business. Customer Complaints are a key objective and the customer element of the Business Plan is reviewed every four weeks at a strategic level at Customer Service Management Group to assess KPIs and improvement actions to determine if they are delivering the anticipated impact or whether intervention is required.

8 Data Protection

TPE commits to the ATOC National Rail Standard for Customer Complaints and Correspondence involving two or more Rail Service Providers. Any complaint or claim referring to another operator's services, Network Rail or other agencies, will be acknowledged and passed on within our published response times and we will advise the customer that this action has been taken and give them contact details for the relevant customer services. This is, however, subject to the customer having given us permission to share these details. Clear and informed consent to do so will be obtained at the time that the customer submits the complaint, regardless of the method they choose to contact us.

Our Complaints Form also requests customers to allow us to share their complaint with ORR and Transport Focus. This is a general permission to facilitate audit and research. Passengers are able to opt out of the industry, ORR and TF data sharing, but are advised that doing so may limit our ability to help with their complaint.

Our customers' data are protected in accordance with the Data Protection Act, as explained in our Privacy Policy which is available at <u>www.tpexpress.co.uk/help</u>.

Our records are kept in TOCrm and reports are produced in the form suited to reporting to ORR and TF and, in-house, by Management Group. ORR core data are reported every period and we provide ORR further detail or fuller reports on request. Individual identifiers are removed from the data, which are aggregated in these systems. Our Customer Relations Manager has full access to TOCrm and uses this access to monitor passenger satisfaction with the service provided.

Because TOCrm is a customer information management system, it will find the customer again to see their history of contacts - for complaints, praise, etc. and the Level 1 reason for contact.

The complaints themselves are kept electronically in a secure system. Any physical paper is kept for 6 months and then shredded after scanning. The electronic system autoarchives every six months. Electronic records are stored in archive for the life of the franchise.