

# Complaints Procedure Process



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## Introduction

This document sets out the internal processes which allow effective redress and enable complaints information to be mined as a source of intelligence so the business can continually improve over the longer term.

We believe that it is good practice for continual improvement that management information and insight from these complaints is used to identify systemic and recurring problems and to indicate areas when services should be improved.

For this Complaints Handling Procedure a complaint is defined as “any expression of dissatisfaction by a customer or potential customer about service delivery or the company or industry policy”.

Although all expressions of dissatisfaction are deserving of a response, we recognise that a distinction should be drawn between a complaint and feedback, for the purpose of establishing clarity around what is within scope of this Complaints Handling Procedure.

Feedback can take the form of comments which are neutral, positive or negative, about services, without necessarily requiring corrective action, change of services or formal review of a decision. We will gather feedback through:

- analysis of social media, online forums and consumer websites;
- sending post-travel surveys to customers;
- through our customer and stakeholder engagement strategy; and
- by listening to what our staff and customers tell us.

The Head of Customer Experience will be responsible for monitoring feedback as it:

- may adversely affect our reputation; and
- provides insight, influencing future service and delivery methods.

Where we feel the feedback could be characterised as a complaint we will channel the customer to use the formal complaints procedure:

- If the feedback is made to a member of staff at stations or on train they will try to resolve the complaint initially and then, should the customer still be aggrieved, hand the customer a complaint form or direct the customer to the complaints section of the website.
- If the feedback is made by social media, our social media advisors will provide a link to the complaints page on the website.
- If the feedback is made by phone, the customer experience centre staff will offer to send a complaints form or will take full details over the phone.

We are committed to ensuring that all of our customer-facing staff have the knowledge, skills and are empowered to deal with complaints about our services. We provide specific customer service training on resolving complaints and will give staff discretion to resolve complaints on the spot. We will carry out a rolling programme for retraining customer experience centre and frontline staff as well as providing specific training in response to complaints.

# Core Standard 1 - Feedback mechanisms and response

Customers are at the heart of all that we do. However, sometimes, things go wrong and we don't give the levels of service that customers expect. By monitoring and responding to complaints we can improve our service, improve our reputation and improve profitability by providing the levels of service that customers want.

## Ownership of complaints

We aim to be a one-stop shop for complaints so that if a customer contacts us, we deal with the complaint if it has anything at all to do with Northern's services including complaints about a specific train, ticket office or station.

We forward complaints about delays to other operators' services to the relevant operator or Network Rail and let the complainant know what we have done.

On a multi-leg journey where complaints are about more than one operator (including Northern), we take ownership of the complaint and coordinate the response from other operators. This means that for the part of the complaint that is not about Northern we will ask the other operators' customer relations teams to carry out the investigation and come back to us with the answer so that we can formulate a full response.

Where the complaint is about one of our third party suppliers (such as about security personnel; cleaning; revenue protection; suppliers of rail replacement services; or car parking providers) we own the complaint and work with the supplier to coordinate a response.

We always try to resolve the complaint first time, however should customers be unhappy with our response we re-try to resolve the issue and provide the rail ombudsman's details so that it can be escalated separately if the complainant wishes.

## Promoting awareness

We will ensure that details about how to make a complaint are displayed on:

- all major publications such as timetables and the Customer Promise;
- the Northern website and app; and
- notices posted prominently at every station.

Passengers are able to obtain comment forms from on-train staff and at each staffed station and can also submit written comments on a dedicated complaints form on our website (within two clicks of the home page).

At unstaffed stations a notice is displayed stating where comment forms may be obtained i.e. the nearest staffed station as well as displaying the web address where complaints can be made directly and details of our app.

Our Customer Promise, the website and correspondence from the customer experience centre display the address and telephone number of the rail ombudsman, which is the organisation to refer complaints should customers not be happy with our final response. At multi-operator stations, posters clearly display the different contact points for complaints regarding services. Comment forms for all the operators serving the station are also available on request.

The Customer Promise explains fully how customers can make a complaint or claim compensation. The customer version of the Complaints Handling Procedure contains more detail. Both are available at staffed stations, via the customer experience centre or on our website [www.northernrailway.co.uk](http://www.northernrailway.co.uk).

## Easily accessible to all

We have created a customer version of the Complaints Handling Procedure so that it is easily accessible to passengers and simple to understand. We have considered all the contact points that a customer may have and aimed to ensure that however they contact us we respond fairly and take into account their needs.

**In person** - We provide training to customer facing staff (including contractors) at stations and on trains to recognise a potential complaint and, firstly try to resolve it at source, then encourage customers to use the complaints handling procedure.

**By mobile phone** - We have provided a free number that can be used to get through to the customer experience centre. The customer experience centre is open 24 hours a day every day that our services operate. Tel: 0800 200 6060.

**By landline phone** - We have provided a free number that can be used to get through to the customer experience centre. We also provide a textphone service for those who are hearing impaired. Tel: 0800 200 6060.

**By letter (postal)** - We have provided a freepost address for complaints and will also provide complaints forms at stations. Address: FREEPOST Northern Railway.

**Through the website** - We have a dedicated page for complaints, [northernrailway.co.uk/help/contact](http://northernrailway.co.uk/help/contact), with information on how to complain, a link to the complaints handling service quality standards, and a clear web form with a standalone 'complain' option. This page also includes Frequently Asked Questions and updates on our progress following major events. Our complaints form is accessible in two clicks from the home page and can be accessed in large print for the visually impaired.

## Via online intermediaries, such as Resolver

- These complaints will be dealt with by the customer experience centre in the same way as complaints submitted directly through the website.

**Social media** - We have a social media policy that is included on the website. Although we monitor social media to drive ongoing service improvements, we do not recognise social media as a forum for complaints. Complainants are directed to the web page to make a formal complaint and be made aware of the Complaints Handling Procedure with details of processes and timescales.

## Respecting equality and diversity

It is essential that no one is excluded from lodging a complaint. We make it easy for all our customers to provide feedback, taking into account the specific needs of all individuals including those with different types of disabilities. We provide a range of means to contact us (see above).

We work with charities to provide training for frontline staff in recognising the needs of customers with specific disabilities.

Where possible we will provide complaints information and responses in accessible formats, depending on customers' particular needs. We will exploit new technologies and systems to help us do this. Our customer relationship management system (CRM) will allow us to recognise repeat customers who contact the customer experience centre and to respond to their specific needs accordingly.

Carers, support workers and guardians are able to act/advocate on behalf of a passenger with the passenger's permission/authority (subject to the data protection and privacy policies below).

## Respecting complainant confidentiality

Our privacy policy is published on the website and is available on request from the customer experience centre and broadly covers:

- an explanation of the type of data held and how it is collected;
- commitments on the security of held data;
- what access the complainant has to the data;
- how can the complainant challenge what is held; and
- an explanation of how the data is used.

Additionally the privacy policy explains our approach to:

- ensuring that complainants' confidentiality is protected and that personal details are not divulged to third parties without consent;
- the way we collect, use, store and manage sensitive details;
- not passing on complainants' personal details without their permission; and
- providing an opportunity for complainants to be able to opt out of being contacted by the Office for Rail and Road (ORR), rail ombudsman or other operators about their complaint or having their details forwarded to the relevant operator to deal with the complaint.

## Response times

All correspondence is acknowledged within five working days and a full response provided within 20 working days. An automatic response is generated to comments received by email.

We are required to make a full response to 95% of all complaints within 20 working days but we will try our best to improve on this. Our full service standards are on page 14.

If there is an exceptional event such as:

- cancellations and delays caused by exceptional weather (severe snow or flooding) affecting large areas of the network;
- Force Majeure events such as acts of God, war damage, enemy action, terrorism or

suspected terrorism, riot, civil commotion or rebellion ("Emergency Events");

- suicide or attempted suicide affecting rail services;
- the activities of the police, fire service, ambulance service or other equivalent emergency service; or
- strike or other industrial action.

If we receive a sudden or unexpectedly large increase in the volume of complaints we may not be able to meet the 20 day timescales but we will use all reasonable endeavours to do so. In this case we will inform ORR and put a message on the complaints page of our website. This message will include:

- the reason why normal standards cannot be achieved;
- expected duration of the emergency timescales;
- plans in place to remedy the situation; and
- procedures to ensure the quality of responses is maintained.

## Empowering staff to resolve complaints at source

Where possible, we give our customer facing staff discretion to resolve certain types of complaints immediately without reference to senior management.

Sensitive and swift on-the-spot handling of difficult situations may help to avoid a large number of written complaints, but at the same time deliver satisfaction to the passenger. We are not required to publish these complaints resolved at source to ORR but we will monitor for accounting purposes and to gauge effectiveness.

Additionally, all of our customer facing staff are trained to recognise a potential complaint and direct customers to the formal channels for making a complaint including detailing the exact nature of the complaint and what the customer would specifically like us to do about it.

## Informing complainants of progress

Communication through the complaints process is an important element in trying to resolve the complaint effectively. We always try to tell customers when they should expect a full response from the outset. Where the complaint can't be answered fully within the published timescales we make sure the complainant is made aware of potential delays and provide regular updates on progress and the phone number and complaints reference so that the complainant can contact the customer experience centre directly and check progress.

## Full and fair investigation

Our investigations are tailored and proportionate to the issues raised and will address each of the issues. We follow the ORR's six step process:

Step	Action
Analysis of complaint	Identify the key elements of the complaint and any facts to be checked
Evidence gathering	Check train service records using the national rail Historic Departure Boards system Check relevant policies and procedures on knowledgebase Identify gaps in evidence Gather reports from managers/witnesses
Corroborate and analyse	Objective analysis of all evidence Managers to get reports from involved staff and interview if required
Application	Determine what happened compared with what should have happened
Reasons	Identify the root cause of the failings
Response	Development of recommended response and/or resolution

We then provide a full written response to all complaints. This response will generally be by email if an email address is provided as this is the quickest channel. However, if a customer gives only their address or phone number this will be the channel we use to respond.

Our responses will be free of railway jargon and in plain English. All staff in the customer experience centre have guidelines on the tone and level of formality and will have training and development on the correct response. Each month, as part of our continuous improvement programme, staff in the customer experience centre look at a selection of the responses as a training exercise and comment on the investigation and reasonableness of final response.

Should a customer respond that they are not satisfied with the response we will:

- carry out a further full investigation;
- respond further to the complainant and provide Transport Focus's details.
- include details for Alternative Dispute Resolution (ADR) (but explaining we will not use an ADR supplier).

We will also review all complaints about the way complaints are dealt with each month considering:

- whether we need to change the investigation procedure;
- whether the response was reasonable;
- what other actions we could have taken to resolve the complaint;
- whether we need to be clearer about our complaints handling procedures;
- whether we can improve on our responses to customers.

## Frivolous and vexatious complaints

As a decision of last resort we may terminate our correspondence with a complainant before full resolution has been reached if we consider the ongoing communication is frivolous or vexatious.

The decision to classify a complainant as frivolous or vexatious can only be taken by the Head of Customer Experience. The decision will be recorded and relayed to the customer with the contact details of the rail ombudsman.

The customer experience centre have training and guidance on what may constitute a frivolous or vexatious complaint and will seek guidance from the Head of Customer Experience.

We record terminated complaints and report to ORR each period. We expect very few and will review numbers and reasons each period as part of our continuous improvement process.

## Compensation for delays

Our Customer Promise details the delay repay policy and procedures for customers affected by train delays. Where customers have made a complaint about train delays we will signpost them to the delay repay policy so that they can claim compensation. Delay repay claims in themselves will not be considered to be complaints and will be recorded and monitored separately.

## Escalation

Complaints will be escalated for a number of reasons. The following, non-exhaustive list is a guide:

- if a complainant requests escalation;
- where there is an allegation of fraud;
- if the complainant is particularly aggrieved;
- if the complainant is not satisfied with the response received;
- where there may have been a safety breach or near miss;
- where there is an allegation of illegal behaviour;
- where a customer has suffered physical

- harm;
- where there is a serious risk to the reputation of the company;
- where there is an allegation of gross misconduct;
- if the complaint is unusual; or
- if there has been an unexplained series of similar complaints.

Staff are trained to recognise when a complaint should be escalated through the following steps:

<b>Supervisor</b> Staff clarify with Supervisor whether complaint should be escalated (immediate)
<b>Customer Experience Centre Manager</b> Considers whether should be escalated to Head of Customer Experience (within two days)
<b>Head of Customer Experience</b> Will deal with the majority of escalations (within 10 days)
<b>Commercial Director</b> Is advised about very serious or damaging complaints (within 15 days)

## Appeals to the rail ombudsman

We take your comments seriously, so when you make a comment or a complaint we will investigate it thoroughly and give you an explanation, regardless of whether we, our contractors, our suppliers or even another train operator was responsible.

## The Rail Ombudsman

Please give us the opportunity to try to resolve your complaint. If you're unhappy with the response you receive, you have the right to appeal to the Rail Ombudsman.

The Rail Ombudsman is there to help resolve disputes between us and our passengers. It's free to use their services and they are independent of the rail industry. They don't take sides, but just look at the evidence available. They will help us both to try to reach an agreement, but if this doesn't happen, they will make a decision based on the evidence they've received. If you agree with their decision, then we have to act on what they say.

You can appeal to the Rail Ombudsman if:

- you're unhappy with our final response to your complaint which will be contained in a letter or email (sometimes called a 'deadlock letter'); or
- we haven't resolved your complaint within 40 working days of receiving it; and
- no more than 12 months have passed since we sent you our final response

There are some complaints that the Rail Ombudsman won't be able to look into, for example if it's about the way one of our services has been designed, industry policy, or if your complaint relates to an event which took place before the Rail Ombudsman service was established. If that's the case, then they'll contact you to let you know.

If possible, they will transfer your complaint to another organisation that may be able to help you further, such as Transport Focus – the independent consumer watchdog for the rail industry. They will independently review your complaint and where appropriate, follow things up on your behalf.

# Core Standard 2 - Structure, people and processes

This part of our Complaints Handling Procedure details the organisational structure, training and quality assurance processes we have in place. Ensure:

- well trained staff on stations and trains and sufficient resources to provide good service;
- written procedures which all staff are aware of, that they can access through our app and are managed to adhere to;
- customer facing staff are supported and coached by their highly visible line management team and there is a regular interface between office-based managers, the senior leadership team and frontline staff; and
- we monitor and measure standards of service and strive for continuous improvements.

## Organisational structure and people

Our complaints are forwarded to the customer experience centre in Sheffield ~~which is managed by Carillion (a third party supplier) with whom we have a partnership agreement.~~



This team monitor and manage complaints and provide regular and transparent reporting through the Head of Customer Experience.

All customer experience centre staff have been fully trained, including specific training for handling complaints and delay repay, combined with visits to other Arriva Train Operating Companies (TOC) and on-the-patch route and service training. We are also putting standards in place to ensure consistency and effective and efficient resolution of customers' problems.

The centre is staffed by a dedicated team of customer service assistants in a mix of full and part-time roles and will operate all day, every day that our network runs services.

The Head of Customer Experience is responsible for the customer experience centre team.

Key Service Level Agreements we have include:

- 80% calls answered within 30 seconds;
- 95% calls answered;
- 95% email/web complaint acknowledgement within three hours;
- Formal response to emails within 10 days; and
- close 95% of complaints received through any channel within 20 working days.

### **Training and development**

We have committed that all customer facing staff receive four days of continuous professional development per year. They also receive induction training when they first start and a specific customer service training day in the first year.

All complaints handling staff have the capability, knowledge, skills, experience and ability to deliver a good service. They benefit from ongoing learning and development.

We use the outcomes of complaints to feed into our training programmes where there are lessons to be learned.

We will also retrain staff if we receive multiple complaints about a specific issue.

### **Our promise: personal information**

We apply appropriate administrative, technical and organisational security measures to protect your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. All information you provide to us is stored on secure servers.

We are part of the Arriva plc Group, which trains its employees regarding our data privacy policies and procedures and permit authorised employees to access personal data on a need to know basis, as required for their role. We also take steps to ensure that any service provider that we engage to process personal data on our behalf takes appropriate technical and organisational measures to safeguard such personal data.

Complaints will be categorised at four levels.

**Level 1** – standard complaints which are relatively straightforward

**Level 2** – complaints about more than one issue or requiring more investigation

**Level 3** – manager level complaints raising complex issues with serious consequences

**Level 4** – Managing Director level complaints

We expect these to arrive in a number of formats – email, webforms, phonecalls and letters. Emails, webforms and the details from phone conversations will be filed electronically. Letters will be scanned in and filed electronically. All will be held in reference number order.

The electronic copies of all complaints and the associated responses will be held electronically for a period of three years. The CRM log (above) will be ongoing for the life of the franchise. Hard copies of correspondence will be destroyed once the case is closed.

## Quality controls

We impose five levels of quality checks for our complaints handling procedure as follows:

<b>Supervisor check – daily</b> <ul style="list-style-type: none"><li>• Listening in to calls made</li><li>• Checking the quality of written responses</li></ul>
<b>Customer Experience Centre Team Manager – weekly</b> <ul style="list-style-type: none"><li>• Looking at selection of complaints and responses for training</li></ul>
<b>Service Quality Coaches/Customer Experience and Research Manager</b> <ul style="list-style-type: none"><li>• Looking at volume of complaints, volume of appeals and reasons for escalations</li></ul>
<b>Head of Customer Experience – Operations Manager (periodically)</b> <ul style="list-style-type: none"><li>• Looking at escalated complaints and trends</li></ul>
<b>Commercial Director</b> <ul style="list-style-type: none"><li>• Advised about very serious or damaging complaints (within 15 days)</li></ul>

At least 10% of responses to complaints are monitored for quality.

## Identification of systemic weakness

All customer complaints are logged and held in the customer experience centre and the five levels of checks detailed above are used to identify the scale and trends in dissatisfaction. Complaints are used as a source of intelligence to inform the business of issues causing customer dissatisfaction.

Complaints about individual members of staff are fully investigated to ensure that the wider context of individuals' working pattern, home circumstances or working environment is not causing them to behave in a way that is not customer focused. Particular attention is paid where there are health and safety implications raised by a complainant for customers or staff.

The customer experience centre will be asked to escalate complaints relating to health and safety issues so that they can be logged by the safety team and the accident reporting procedure instigated where necessary. Where complainants allege they have sustained an injury as a result of the licence holder's operations, this will be escalated and consideration given to whether the incident is reportable to ORR under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013.

## Complaint handling service standards

These provide a statement of what the complainant can expect from the complaints process and give us a metric by which success can be measured:

- this complaints handling procedure is subject to high level governance;
- the complaints handling process is easily accessible and easy to use;
- complaints handling staff are well trained and professional;
- complaints will be fully and fairly investigated;
- complaints will be answered in full within 20 working days or sooner where possible;
- complainants will be kept informed of progress of their complaint;
- we will try to resolve complaints to the satisfaction of the complainant;
- we will monitor trends and address systemic issues and learn from them; and
- complainants will be advised of their right to representation by Transport Focus.

We will provide a report to ORR and publish a Customer Report each period that includes:

- 1. Total number of complaints**
- 2. Percentage of complaint cases responded to including:**
  - a) Percentage of complaints responded to within 20 working days
  - b) Percentage of complaints responded to within 10 working days
  - c) Percentage of complaints responded to within five working days
  - d) Percentage of complaints responded to by contact method e.g. phone, email, letter, etc.
- 3. Total number of complaints received by complaint category**
- 4. Complaints about the complaint handling process:**
  - a) response time
  - b) type/level of compensation
  - c) complaints not fully addressed / fulfilled by us
  - d) no response from us
  - e) we were impolite/unhelpful
  - f) complaint not received
  - g) other
- 5. 'Frivolous and vexatious' complaint volumes (and narrative)**

Additionally we provide a narrative annually to ORR on how we are measuring continuous improvement in complaints handling and how we are using complaints to improve the business.

We also include in our Customer Report the results of surveys from ORR or rail ombudsman on:

- customer satisfaction with the complaints handling process; and
- satisfaction with complaint outcome.

# Core Standard 3 - Organisational culture

This core standard details the mechanisms by which complaints data is used to shape and inform service improvements and address root causes of complaints.

## Organisational ownership and commitment

We recognise that increased passenger satisfaction can lead to growth and future profitability. We value complaints as a way to gain insight on the performance of our business. Dealing with the root causes of complaints will help to improve our reputation and potentially help secure future franchise awards.

## Learning from our own experiences

We strive for continuous improvement and learning from our experience by:

- acting on the research we carry out with our customers and stakeholders;
- regularly reviewing our progress with stakeholders;
- customer complaints – understanding what our customers are unhappy about and putting it right, seeking to identify and act on the root cause of complaints; and
- reviewing our National Rail Passenger Survey (NRPS) and Service Quality (SQ) scores and acting on the results of them.

## Learning from others

Our continuous improvement will be enhanced by learning from sources outside Northern:

- Institute of Customer Service: we are members of the Institute of Customer Service, and use our membership to benchmark ourselves against other leading customer service organisations as well as to accredit our training;
- Arriva UK Customer Improvement Network: we participate together with all Arriva TOCs in this forum which benchmarks quality and drives best practice and strategic advancement;
- Arriva UK Passenger Information During Disruption (PIDD) Forum: we are active members of the group-wide PIDD forum to both improve group wide management of PIDD as well as our own;
- ORR: we continue to work with ORR to understand and improve complaints handling;
- as part of the Deutsche Bahn Group we have a number of internal companies against which we can also measure ourselves and learn best practice from.

At Director level, the Commercial Director will own the Complaints Handling Procedure and the measures of how we are doing against it. Management information on complaint volumes, trends and underlying causes are reviewed each period at Board level so that systemic issues can be identified and addressed. The volumes are also published in our customer report and be accessible to customers through the data portal on our website.

Complaints handling is a key proposition within our Customer and Stakeholder Engagement Strategy which details the importance of listening to passengers and using complaints themes and trends to improve the quality of service offered.



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