Rail compensation
– update report

December 2016

Contents

Executive Summary

Introduction

1. On 21 December 2015 Which? submitted a super-complaint to the Office of Rail and Road (ORR) raising concerns that most rail passengers who experience delays are not aware of, nor apply for, the compensation to which they are entitled. We responded[1] to the super-complaint on 18 March 2016 ('the response report') proposing a package of recommendations designed to increase passenger awareness of their rights, improve the information that passengers receive and make the claims process more passenger-friendly. This report:

    ■ provides an overview of progress including highlighting areas where this has fed through to improvements for passengers;

    ■ updates on the relevant requirements of the Consumer Rights Act 2015; and

    ■ describes next steps.

Overview of progress

2. We set out seven recommendations in response to the super-complaint:

    ■ A coordinated, national promotional campaign to increase passenger awareness;

    ■ Clarification to the *Information for Passengers* condition in the Passenger Train Licence;

    ■ More consistency in franchise contracts regarding how and when passengers are given information on compensation;

    ■ Better information provision by station and train staff;

    ■ Clearer and simpler information provided on paper claim forms and on websites;

    ■ More customer friendly processes for claiming compensation; and

    ■ Improved monitoring and transparency of compensation information.

3. Data from the passenger research[2] ('the passenger research') that we conducted with Transport Focus and the Department for Transport (DfT), and which was published in November, supports the recommendations that we made.

4. In summary there has been generally good progress in implementing our recommendations which we would expect to feed through into increased passenger awareness and an increase in claims.

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[1] http://orr.gov.uk/publications/reports/rail-compensation-super-complaint-report.

[2] http://www.transportfocus.org.uk/research-publications/publications/rail-delays-compensation/.

5. Some recommendations have been completed and we have the analysis to show how much change there has actually been for passengers; these relate to information on claims and the process for claiming. Our analysis shows many Train Operating Companies ('TOCs')[3] have responded positively to our recommendations and made improvements to the information they provide on claims and the process for claiming, but some have made only minimal changes.

6. We have also discussed with train operators what our mystery shopping research had revealed about the information being provided by their station and train staff and the existence of promotional material at stations and on trains. We intend to undertake a further mystery shop to assess what changes have been made as a result of this feedback. The results of this will be with us by the end of March 2017.

7. It is more difficult to monitor the extent to which oral information is given at the time of disruption given the need to be present during delivery. We are, therefore, using our regular reviews of Passenger Information During Disruption ('PIDD') local plans to drill down at an individual TOC level to understand what they do and how they evaluate and monitor for successful and consistent delivery.

8. In addition to our work there have been a number of other interventions and publications around delay compensation that will have a positive effect for passengers. In October 2016 DfT announced its intention to gradually introduce '*Delay Repay15*'[4], a new scheme allowing passengers to claim compensation for delays of between 15 and 29 minutes[5]. This together with the statutory remedies available now through the Consumer Rights Act 2015 (CRA) provides a strong package of recompense for passengers who receive poor service.

9. We welcome DfT's[6] commitment, in its published response to our super-complaint report[7], to engage with individual franchisees to require them to produce a report on passenger awareness of compensation schemes and the steps they are, and will be, taking to ensure passengers are aware of their right to compensation. We note in this context, that the Rail Delivery Group ('RDG') is currently working to bring about a consistent set of minimum standards between TOCs in the actions that they take to raise passenger awareness which build on the existing '*Compensation Toolkit*'. RDG has said that aspects of these standards will be made publicly available, so that

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[3] For the purposes of this report Train Operating Companies ('TOCs') include all Franchise and Open Access operators as well as TfL Concession TOCs. London Underground, DLR, Tram and Eurostar services were out of scope for the super-complaint and therefore for this report.

[4] Delay Repay15 was introduced on to Southern on 11 December 2016.

[5] https://www.gov.uk/government/news/government-announces-improved-compensation-scheme-for-rail-passengers.

[6] We have had separate discussions with Transport Scotland and also contacted Transport for Wales.

[7] https://www.gov.uk/government/publications/improving-access-to-passenger-compensation-response-following-the-orrs-investigation-of-the-which-super-complaint.

passengers can hold TOCs to account. We also welcome DfT's commitment to require a further report from each franchisee after 18 months in order to review progress.

Table 1 below summarises the progress that has been made against each of the seven recommendations to date.

Table 1 – Progress against our recommendations

ACTION BY	PROGRESS	STATUS
RDG	RDG ran a promotional campaign in national and regional press and selected online, digital and social media channels (October 2016).	**Complete**
ORR	ORR published a regulatory statement clarifying that the scope of the '*Information for Passengers*' licence condition includes provision of information on compensation (June 2016).	**Complete** **(See also paragraph 23)**
DfT	DfT published a response - *'Improving access to passenger compensation for delays and cancellations'* - to the super-complaint report outlining how it intends to use the franchise system to improve consistency in information given to passengers and to proactively monitor compliance with franchise requirements (November 2016).	**Complete**
RDG	RDG is currently working to bring about a consistent set of minimum standards between operators in the actions that they take to raise passenger awareness. It is also developing a best practice suite of documents that will highlight the further steps that could be taken.	**On-going**
TOCs	ORR met with individual TOCs to discuss improvements to staff training (April/May 2016). ORR to review progress by carrying out a further mystery shop of station and train staff.	**Complete** **February 2017**
TOCs	ORR met with individual TOCs to discuss improvements to information provided on paper forms and on websites (April/May 2016). ORR reviewed changes made (August & November 2016).	**Complete** **Complete**
ORR	ORR is working to estimate the overall compensation gap (i.e. the difference between compensation that is due and compensation that is paid). An update on this will be published in our Annual Consumer Report in July 2017.	**On-going**

Areas where we have evidence of improvement

10. Simple, clear and accessible information and easy to use claims processes will increase passenger awareness of delay compensation and the numbers applying for it. The passenger research also found that a wide variety of communication tools are required to reach and include all passenger groups.

11. A review by the Plain English Campaign[8] for ORR in early 2016 uncovered a number of common issues such as the availability of information (e.g. ensuring that information is available through several channels in order to suit all audiences); the navigation of websites; the language and clarity of the information provided in leaflets and on websites and the physical layout and design of forms.

12. Since the publication of our response report we have discussed with TOCs ways in which their information and claims processes could be improved. We carried out a detailed audit of changes to websites, leaflets and claims processes in July and August (the findings of which are discussed in in Chapter 2).

13. In November we carried out a further review of TOC performance against five standards which we identified to set a good practice baseline. **We have not attempted to rank each item in terms of factors such as frequency of use, speed of response or processing cost to the TOC but have instead focused on the need to reach and include all passenger groups.** For example, the passenger research showed that age significantly influences claim form usage with 49% of passengers in the 65+ group choosing to use paper forms vs 30% for the 25-34 group.

14. The five standards are:

   ■ **A dedicated paper delay claim form** - A printed form that is clearly identifiable as a claim form and used for that purpose only.

   ■ **A dedicated information poster or contact card** - Printed information available at stations/on trains which is designed for the sole purpose of informing passengers about Delay Repay/delay compensation.

   ■ **A website homepage link to delay compensation information** - A tab on the front page of the TOC website labelled 'Delay Repay', 'delay compensation' or similar.

   ■ **A website PDF delay claim form** - An additional resource for passengers who prefer paper forms so they can download and print out their own copy.

   ■ **A dedicated online claim process** - An online delay compensation claim process that is clearly identifiable as such and is used for that purpose only.

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[8] http://orr.gov.uk/publications/reports/rail-compensation-super-complaint-response-report.

15. Most TOCs have worked positively with us in delivering improvements. But others have made only minimal changes. In summary, since the publication of our response report in March:

- One additional TOC now has a dedicated paper delay claim form;

- Seven additional TOCs now have a dedicated information poster or contact card;

- 16 additional TOCs now have a website home page link to delay compensation information;

- Five additional TOCs now have a PDF delay claim form available on the website; and

- Six additional TOCs now have a dedicated online claim process.

16. **Table 2** below shows what each TOC was providing against each of the five standards discussed as of **November 2016**. Since this review was completed we have contacted each TOC to review the accuracy of this information. As a result we have also added footnotes to highlight those TOCs that have made further changes since our original review in November.

17. A table illustrating the changes made by each TOC between March 2016 and November 2016 can be found in Annex A.

Table 2 TOC position against each of the five standards[9]

	Dedicated paper claims form	Dedicated poster or contact card	Direct link from homepage	PDF delay claim form on website	Dedicated online claim process
Arriva Trains Wales	✓	✓	✓	✓	✓
c2c	✓	✓	✓	✓	✓
East Midlands Trains	✓	✓	✓	✓	✓
Govia Thameslink Railway[10]	✓	✓	✓	✓	✓
Great Western Railway	✓	✓	✓	✓	✓
London Midland	✓	✓	✓	✓	✓
Northern	✓	✓	✓	✓	✓
Southeastern	✓	✓	✓	✓	✓
South West Trains	✓	✓	✓	✓	✓
Caledonian Sleeper	✓	✗	✓	✓	✓
Cross Country	✓	✗[11]	✓	✓	✓
Greater Anglia	✓	✓	✓	✗	✓
Virgin Trains East Coast	✓	✓	✓	✗	✓
Virgin Trains West Coast	✓	✓	✓	✗	✓
Grand Central	✗	✗	✓	✓	✓
Heathrow Express	✗	✓	✓	✓	✗
Hull Trains	✓	✗	✗	✓	✓
Merseyrail	✗	✓	✓	✓	✗[12]
ScotRail	✓	✗	✓	✗[13]	✓
Transpennine Express	✓	✓	✗	✗	✓
TfL Rail Services – London Overground and TfL Rail	✗	✓	✗	✗	✓
Chiltern Railways	✗	✗	✗	✓	✗

18.　In terms of the substance, content and layout of information provided to passengers we have also noted the following:

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[9] The information in this table is based on the findings from our audit on 4 November. TOCs were given a chance to review this on 14 December 2016 and three TOCs provided updates about changes to the information available to passengers from December 2016.

[10] Includes Southern, Great Northern, Thameslink and Gatwick Express.

[11] Cross County has now introduced a dedicated contact card.

[12] Merseyrail has now introduced an online claims process.

[13] Scotrail has now added a PDF form to their website.

- **Paper forms** - The design and content of paper delay compensation forms has been much improved, with the majority of forms now clearly identifiable by passengers as a delay claim form.

- **Website navigation** - The majority of TOCs now have a clearly labelled link to delay compensation information either on the homepage or within one click.

- **Online information** - The layout of webpages and the information they contain is improved with the large majority of TOCs having clearly written pages dedicated to explaining delay compensation and how to apply for it. The best examples use tables, illustrations and calculation tools, in addition to text, to explain exactly how to claim compensation, when passengers might be entitled to claim and what they may receive.

- **Online forms** - TOCs that have an online process generally have forms that are easy to access and fill in. However, a small but significant minority of TOCs still adopt multipurpose 'contact' forms which are difficult to find and/or potentially confusing for the customer.

Next steps

19. In spite of progress there are also specific gaps that still need to be addressed. For example, the passenger research has shown that prompt decisions and payment of compensation is something that passengers care about and may affect their willingness to claim. The research showed that only half of eligible passengers were satisfied with the speed of the response to their delay compensation claim and a quarter who had received a response needed to prompt the train company about their claim.

20. To ensure sustained improvement our monitoring and work in this area will continue particularly where it is clear that commitments have not been delivered or changes in information and processes have not achieved the objectives of raising passenger awareness of compensation schemes and increasing the propensity to make a claim. In particular we will:

- Raise and clarify our further concerns with specific TOCs. We will reiterate the regulatory position and our powers where appropriate.

- Work with TOCs to understand what more can be done to keep passengers informed about the progress of their claim and discuss the possibility of publishing standard response timescales.

- Meet with TOCs where we have residual questions about the availability of certain methods used to make compensation payments, such as refunds to debit and credit cards, and/or the clarity of the information provided about the options available.

- Use further mystery shopping research to assess improvements made to staff training and information at stations and on trains. Where a TOC has adopted a business model that predominantly provides online information and operates an online claim processes we will test the effectiveness of alternative passenger contact routes that they have suggested will enable non-internet users to seek information and to make compensation claims.

- Audit the local plans that each TOC is putting in place to deliver the updated RDG Code of Practice on the provision of customer information to ensure that TOCs have effective plans and processes in place to fulfil their commitment to provide compensation information to passengers at times of disruption.

- Report on our further progress, including updated estimates of the overall compensation gap (i.e. the difference between compensation that is due and compensation that is paid) in our Annual Consumer Report in 2017.

21. We will also continue to work with both DfT and RDG and update on progress towards implementing their key interventions on compensation, this will include:

- exploring with the DfT how our Annual Consumer Report can be used to introduce transparency into how TOCs are performing against their franchise commitments in this area; and

- monitoring RDG's commitment to evaluate the success of the industry's compensation promotional campaign.

1. Introduction

1.1 On 21 December 2015 Which? submitted a super-complaint to the Office of Rail and Road ('ORR') raising concerns that most rail passengers who experience delays are not aware of, nor apply for, the compensation to which they are entitled. Which? also claimed that there are features of the passenger rail market in Great Britain, including certain conduct by Train Operating Companies ('TOCs') and the limited competition to franchised operators on many lines, that may contribute to this.

1.2 During the 90 day assessment period we looked at existing research, gathered detailed evidence from across the sector, examined TOC websites and social media and reviewed compensation claim processes. We commissioned primary research to assess the quality of how information around delay compensation was presented and how easy it was to find. We asked the Plain English Campaign to review the information available to passengers on TOC websites and printed leaflets to assess for clarity, accessibility and ease of use. We also commissioned a research company to carry out over 300 mystery shopping exercises at stations and on trains to test staff knowledge of delay compensation payments and how easy it was for passengers to locate information about delay compensation themselves. Our response report was published in March 2016 along with the mystery shopping and Plain English Campaign research reports[14].

1.3 We responded[15] to the super-complaint on 18 March 2016 ('the response report'). Our response report concluded that action was needed to increase the number of passengers that are aware of their rights; improve the information passengers receive so they are more likely to claim and make the process for claiming more passenger-friendly.

1.4 To achieve these outcomes we recommended that the following actions should be carried out:

■ **A coordinated, national promotional campaign to increase passenger awareness** - Rail Delivery Group (RDG) and TOCs to launch a coordinated, national promotional campaign to increase passenger awareness in Autumn 2016.

■ **Clarification to the *Information for Passengers* licence condition** - TOCs to acknowledge that the *Information for Passengers* licence condition includes information provision on compensation. Acknowledgement to be reflected in a regulatory statement to be published in June 2016.

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[14] http://orr.gov.uk/publications/reports/rail-compensation-super-complaint-response-report.

[15] http://orr.gov.uk/publications/reports/rail-compensation-super-complaint-report.

- **More franchise consistency to how and when passengers are given information on compensation** - Department for Transport (DfT) and other franchise authorities to review consistency in franchise obligations on how and when passengers are given key information and where necessary provide guidance together with more active monitoring.

- **Better information provision by station and train staff** - TOCs to ensure that better information on compensation is provided by their station and train staff. ORR to check progress by carrying out a further mystery shop in 2017.

- **Clearer and simpler information on forms and on websites** - TOCs to improve their claim forms and websites to make it easier for passengers to claim. The necessary changes to be completed by July 2016.

- **More customer friendly processes for claiming compensation** - TOCs to introduce more customer friendly processes for claiming compensation and for RDG to publish a best practice guide. ORR to check progress in July/August 2016.

- **Improved monitoring and transparency of information** - ORR to lead on improved monitoring and transparency of information to include use of our Annual Consumer Report to identify the rate of progress; analysis of the gap between compensation due and compensation claimed (the compensation gap); new core data indicators; awareness research; and RDG to publish the results of its passenger information satisfaction survey.

1.5 This interim report sets out what progress has been made against these actions. We deal with each recommendation in turn in chapter two.

1.6 DfT published its response ('DfT's response') to the super-complaint on 17 November 2016[16] and noted that the super-complaint was a timely intervention given the evidence that a large number of passengers were unaware of delay compensation and found it difficult to claim. DfT's response supports the conclusions of our response report and our recommendations to increase passenger awareness of and applications for delay compensation.

1.7 Specific commitments made by DfT around consistency in franchise obligations and how it intends to monitor compliance are contained in the next chapter. DfT's response also contains a commitment to future improvements to delay compensation arrangements by agreeing to roll out Delay Repay to new franchisees and ensuring that any new franchise bidder presents credible proposals for simple and accessible delay compensation arrangements.

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[16]https://www.gov.uk/government/publications/improving-access-to-passenger-compensation-response-following-the-orrs-investigation-of-the-which-super-complaint.

1.8 Between March and April 2016 we conducted passenger research[17] into delay compensation with Transport Focus and DfT ('the passenger research'). This research, which involved a survey of 8,000 rail passengers, supports our approach and the recommendations that we made. The objective was to establish the level of awareness, attitudes, claim rates and experience of compensation arrangements. This research was a follow up to initial research conducted by Transport Focus in 2013 but deepened the analysis and extended it by drawing on a significantly larger sample.

1.9 The passenger research showed that 35 per cent of eligible passengers claimed compensation or received automatic compensation for their most recent delay. This is a significant increase from the 12 per cent of eligible passengers found to be claiming in the previous research[18] carried out in 2013. However, it still leaves almost two thirds (64 per cent) of eligible passengers not claiming the compensation they are entitled to. A key factor in this was that more than half of these 'non-claimers' (57 per cent) were not aware that they were eligible to make a claim or didn't even think about it.

1.10 Significantly, the research also found that of those passengers who had claimed delay compensation in the last six months, the biggest source of dissatisfaction with the claims process related to '*the train company alerting me to my right to claim compensation*' (43 per cent dissatisfied with this aspect of the claims process). This re-emphasised the importance of TOCs taking proactive measures to alert their passengers to their eligibility for compensation following a delay and, equally, how to make a claim.

1.11 A further finding from the research was that only half of eligible passengers were satisfied with the speed of the response to their delay compensation claim and a quarter who had received a response needed to prompt the train company about their claim. Prompt decisions and payment of compensation is therefore something that passengers care about and may affect their willingness to claim.

We will now work with TOCs to understand what more can be done to keep passengers informed about the progress of their claim and discuss the possibility of publishing standard response timescales.

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[17] http://www.transportfocus.org.uk/research-publications/publications/rail-delays-compensation/.

[18] http://www.transportfocus.org.uk/research-publications/publications/understanding-rail-passengers-delays-and-compensation/.

2. Report on our progress and key findings

Introduction

2.1 We worked with TOCs, RDG and DfT to implement the recommendations made in our response report.

2.2 This chapter provides:

- a progress report against each of our recommendations including a summary of what DfT has committed to do in terms of increased monitoring and moving towards more consistency in franchise obligations;

- an explanation of what passengers will be able to see in terms of changes made to information provision and the claims process itself;

- an overview of progress on the adoption of new technology such as mobile apps and automated processes;

- a progress report on how TOCs have implemented the requirements arising from the Consumer Rights Act 2015 ('the CRA') in particular on how compensation is paid; and

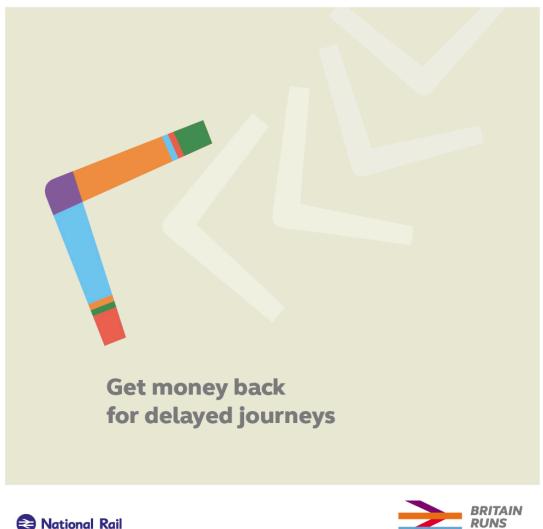- our views on improved monitoring and how transparency can play a role in this.

Progress against our recommendations

2.3 This section sets out progress against each of our recommendations.

A coordinated, national promotional campaign to increase passenger awareness

2.4 We recommended that a national public awareness campaign, co-ordinated by RDG, should be carried out in autumn 2016. We asked that the campaign be:

- **Effectively targeted at a wide audience** - aimed at current and future passengers and both business and leisure travellers;

- **National** - with far reach into the regions and devolved nations;

- **Timely** - taking place at a time when it is likely to have the most impact with passengers; and

- **Sustainable** - Have a long lasting impact on passengers and increase knowledge of delay compensation.

2.5 RDG launched its co-ordinated, on-going '*Rail Refunds*' campaign on 17 October 2016.

Figure 1.1: Sample of the national promotional campaign publicity

Get money back
for delayed journeys

National Rail

BRITAIN
RUNS
ON RAIL

2.6   The campaign ran for an initial eight week period with a commitment to consider the need for further activity in the future following an evaluation of its impact. The campaign consisted of advertisements in twenty one regional newspapers and in the Metro and in City AM newspapers (free titles handed out to commuters at stations). There was also online advertising, social media activity and targeted digital adverts to appear when a user was near a train station.

2.7   TOCs were also provided with posters and leaflets to customise and use at their stations.

2.8   RDG and its members also intend to embed digital and poster elements of the campaign into future publicity activities in order to ensure that awareness is sustained over time.

2.9   The national promotional campaign, therefore, includes activity conducted both by RDG and individual train companies. We welcome DfT's commitment, within its response, to exercise its powers through the franchise agreement to monitor the activities of TOCs in promoting awareness. In particular its commitment to require franchisees to produce a report on passenger awareness of compensation schemes to include an assessment of current levels of awareness among their passengers and to set out the steps they are currently taking to make passengers aware of their right to claim compensation and what further steps they plan to take in the future.

2.10   RDG has also committed to undertake an evaluation of the success of the promotional campaign in terms of increased passenger awareness. RDG has undertaken an early assessment of engagement in the campaign and the initial results suggest that the campaign is going to plan but it is too early to tell whether the campaign has achieved the desired objective of raising awareness.

We will explore with DfT how our Annual Consumer Report can be used to introduce transparency into how TOCs are performing against their franchise commitments in this area.

We will monitor RDG's commitment to evaluate the success of the industry's compensation promotional campaign.

Clarification of the *Information for passengers* licence condition

2.11   The passenger information licence condition was established in 2012 to ensure that passengers get the information they need to be able to plan and make their journey with reasonable assurance including during disruption.

2.12   The industry's Passenger Information During Disruption ('PIDD') programme includes some actions that relate to compensation and in industry submissions to the super-complaint investigation the PIDD programme was often cited in support of the actions that the industry were already taking to raise awareness of compensation. This supported our view that the information licence condition already included all stages of a passenger journey, including post journey information such as compensation. We were of the view, therefore, that there was no need to modify the licence condition itself but we took the opportunity to update the associated regulatory statement to make it clearer about scope.

2.13   We wrote to all licence holders in May 2016 to ensure that they were clear as to scope and that the licence condition includes post journey information such as compensation.

2.14 In their replies the TOCs raised a number of concerns, these were:

- that the need to inform passengers of their compensation rights in the event of a delay only applies when the compensation threshold has been met. The concern being that a delay of a few minutes should not trigger compensation messages; and

- that possible 'double jeopardy' between the licence and the franchise agreement would be resolved by ORR working with DfT before any action was taken.

2.15 We were able to address both concerns. The original PIDD action specifies that the delay threshold has to be reached and we currently, and will continue to work with DfT in this area.

2.16 A revised PIDD statement was published on our website in June 2016. [19.]

2.17 Since we published our updated statement and reflecting progress in delivering the industry's PIDD actions, the TOCs have worked together to revise the industry code of practice[20]. Many of the industry actions that have been completed are now included as "business as usual". A message about compensation will be included in the core message given to passengers when disruption occurs. It already forms part of the standard template used by National Rail Enquiries (NRE) which is then included on TOC websites which take the NRE disruption feed. The code also includes the need to make sure passengers are aware when compensation can be claimed and how to do it. We now expect to see this included in the local plans that TOCs produce to set out the actions that they will take to comply with the Information for Passengers licence condition.

We will audit the local plans that each TOC is putting in place to deliver the updated RDG Code of Practice on the provision of customer information to ensure that TOCs have effective plans and processes in place to deliver on their commitment to provide compensation information to passengers at times of disruption.

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[19] http://orr.gov.uk/__data/assets/pdf_file/0015/4353/information-for-passengers-guidance-on-meeting-the-licence-condition.pdf.

[20] The approved code of practice may be downloaded from the Rail Delivery Group website - http://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469771025.

More consistency in how and when passengers are given key information

2.18 In our response report, we recommended that DfT and other franchising authorities review consistency across franchise agreements[21] and where necessary provide guidance to TOCs on ensuring more regular promotion of compensation schemes (e.g. greater use of on train announcements at the time of delay).

2.19 We said that this should be accompanied by a more proactive approach to monitoring how this happens in practice and that we expected the data collected on monitoring to be published in our Annual Consumer Report to ensure transparency and drive further improvements.

2.20 DfT's response committed to complete the roll-out of the franchise requirement to '*use all reasonable endeavours*', to all franchises where this obligation did not currently exist. DfT commits to do this at the earliest available opportunity and, where possible, to harmonise across all franchises the underlying non-exhaustive list of activities that franchisees should be undertaking.

2.21 We also support DfT's intention to require franchisees to deliver a report outlining the steps they are, and will be taking to fulfil the reasonable endeavours obligation and to use this, available evidence and industry best practice to evaluate compliance and to repeat this exercise after a further 18 months. DfT has asked RDG to publish best practice for TOC claim processes and we, along with the DfT, support its adoption.

> **We will continue to work with DfT as it puts these commitments into practice and will explore with the DfT how our Annual Consumer Report can be used to introduce transparency into how TOCs are performing against their franchise commitments in this area.**

Better information provision by station and train staff

2.22 As part of our super-complaint investigation we commissioned a research agency to carry out a mystery shopping exercise at stations and on trains.[22] Mystery shoppers questioned station and train staff about their company's delay compensation arrangements and the process for making claims. The overall intent was to establish if train operators' staff were providing accurate and useful information to passengers

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[21] We note that franchise agreements contain a mix of requirements on TOCs over how and when passengers should be made aware of compensation arrangements. Older agreements provide less detail while more recent ones specify requirements around e.g. making appropriate announcements to passengers on trains and at stations, and making compensation claim forms readily available to passengers.

[22] http://orr.gov.uk/__data/assets/pdf_file/0009/21105/rail-delay-compensation-mystery-shopping-findings-report.pdf.

upon request. They also made observations on the availability of written or visual information, such as leaflets, posters and signage, regarding delay compensation at stations and on trains.

2.23 Staff knowledge and understanding of delay compensation was generally poor. Less than one-third (30 per cent) of the mystery shoppers received a full and accurate explanation of the arrangements and conditions for claiming compensation. Performance varied significantly between different train operators, with the best performer achieving a success rate of 69 per cent and three scoring 0 per cent[23]. Where a score of 0 per cent was achieved this was largely because the operator had adopted a business model that directed passengers to online information and so lack of staff knowledge was a direct result of this decision.

2.24 Industry performance on the provision of written or visual delay compensation information was also disappointing, where it was only observed by mystery shoppers at 30 per cent of staffed stations, 14 per cent of unstaffed stations and on 30 per cent of trains. Performance on this measure was also highly variable; where the availability of information not only varied across different train operators, it also varied across an individual operator's stations and trains.

2.25 In April and May 2016 we met with all TOCs included in the research to discuss their individual results from the mystery shopping research and any key issues that had arisen. In these meetings, and in response to this feedback, we obtained agreement from the TOCs, where relevant, to make improvements in staff training processes and availability of information at stations and on trains. The initiatives that TOCs have committed to include revising training programmes to ensure sufficient profile is given to compensation awareness and establishing better ways to check that the training is making improvements in practice.

2.26 TOCs have also considered how to improve the presentation and placement of printed information at stations and on trains. The responsiveness of TOCs to our recommendations in relation to this varied by operator depending on their own operational characteristics, the markets they served and the space available. For some open access TOCs or other TOCs who do not manage stations, making improvements may involve revisiting the agreements they have with the station managing TOC or Network Rail. This would ensure that information about their delay compensation arrangements is displayed appropriately and that staff from other operators who might encounter their passengers are adequately trained, for example.

We will use further mystery shopping research to assess improvements made to staff training and information at stations and on trains. Where a

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[23] http://orr.gov.uk/__data/assets/pdf_file/0009/21105/rail-delay-compensation-mystery-shopping-findings-report.pdf.

> TOC has adopted a business model that predominantly provides online information and operates an online claim processes we will test the effectiveness of alternative passenger contact routes that they have suggested will enable non-internet users to seek information and to make compensation claims.

Clearer and simpler information on claim forms and websites and more customer-friendly processes for claiming compensation

2.27 As part of our super-complaint investigation we commissioned the Plain English Campaign to review information provided by TOCs to passengers about delay compensation in the form of paper claim forms, websites, online claim forms and also the process of claiming for compensation. The review provided feedback on and suggestions for improving the layout and content as well as the ease of the application process.[24]

2.28 The review uncovered a number of common issues such as the availability of information (e.g. ensuring that information is available through several channels in order to suit all audiences); the navigation of websites; the language and clarity of the information provided in leaflets and on websites and the physical layout and design of forms.

2.29 In April and May 2016 we met with all TOCs included in the review to discuss their individual results and agree an action plan of improvements.

2.30 We were keen to ensure that passengers could begin to see the benefits of our recommendations as soon as possible, so TOCs were asked to commit to making as many improvements to their websites and paper forms as they could by July 2016.[25]In order to assess progress made, we carried out our first audit of online and printed materials in July and August 2016. [26] This audit assessed improvements to the provision and quality of online and printed information about delay compensation.

2.31 During our meetings with TOCs, however, they advised us that some changes would be delayed until implementation of the changes to leaflets and websites required as a result of the application of the CRA to rail passenger transport in October 2016. We,

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[24] http://orr.gov.uk/__data/assets/pdf_file/0011/21107/plain-english-assessment-of-toc-compensation-information.pdf.

[25] In June 2016 we wrote to all TOCs requesting copies of their improved printed leaflets and any other printed information materials used to inform passengers about delay compensation at stations or on trains.

[26] Materials included in the audit were - websites, online claim forms, paper claim forms, PDF claim forms, apps, posters and other printed materials at stations and any innovative technology.

therefore, carried out a shorter audit on 4 November 2016[27] to identify any additional improvements or changes that may have been made. We assessed the changes made because of CRA requirements separately and the results of this are discussed in paragraphs 2.53 - 2.62 below.

2.32 The November audit was not a repeat of the detailed July/August audit but a review of TOC performance against five standards we developed to set a good practice baseline for TOCs. We have not attempted to rank each item in terms of factors such as frequency of use, speed of response or processing cost to the TOC but have instead focused on the need to reach and include all passenger groups. For example, the passenger research showed that age significantly influences claim form usage with 49% of passengers in the 65+ group choosing to use paper forms vs 30% for the 25-34 group[28].

2.33 These five standards are:

■ **A dedicated paper delay claim form** - A printed form that is clearly identifiable as a claim form and used for that purpose only.

■ **A dedicated information poster or contact card** - Printed information available at stations/on trains which is designed for the sole purpose of informing passengers about Delay Repay/delay compensation.

■ **A website homepage link to delay compensation information** - A tab on the front page of the TOC website labelled 'Delay Repay', 'delay compensation' or similar.

■ **A website PDF delay claim form** - An additional resource for passengers who prefer paper forms so they can download and print out their own copy.

■ **A dedicated online claim process** - An online delay compensation claim process that is clearly identifiable as such and is used for that purpose only.

2.34 A summary of our findings can be found at **Table 2** in the Executive Summary. A more detailed narrative from both of our audits is set out below.

A dedicated paper delay claim form

2.35 Paper forms are still a popular way to apply for delay compensation and are still used by many passengers. The passenger research found that just over a third (37 per cent) of eligible passengers who claimed delay compensation did so using a paper form they posted or handed in at the station[29]. Our review[30] also pointed to the

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[27]Since this review was completed we have contacted each TOC to review the accuracy of this information. As a result we have also added footnotes to the tables in the Executive summary and Annex A to highlight those TOCs that have made further changes since our original review in November.

[28] http://www.transportfocus.org.uk/research-publications/publications/understanding-rail-passengers-delays-and-compensation/.

[29] http://www.transportfocus.org.uk/research-publications/publications/rail-delays-compensation/.

potential for passenger confusion where TOCs did not offer a dedicated compensation claim form, offering instead a multi-purpose contact form also used for feedback and/or complaints.

2.36 The majority of TOCs now have forms that are clearly labelled as delay compensation forms and most TOCs have reacted positively to the suggestions made by the Plain English Campaign and have made changes that make the forms easier to understand and to use. However, as of 4 November 2016 five TOCs did not have a dedicated paper claim form[31], with two TOCs[32] not having paper claims forms at all, having moved all of their claims processes and information online. This may act as a barrier to claiming for some passengers, particularly those with limited or no internet access.

2.37 One such TOCs operates an online/mobile first policy and has responded that it believes that this, coupled with its easy smart card system, offers good service to passengers looking to claim for delays. Passengers that cannot use the internet are advised to call customer services. The second TOC does not see the need to use paper forms as it maintains the majority of its passengers are content to use the internet and those that cannot are advised to write to customer services.

2.38 We believe that providing a wide range of application methods (e.g. paper forms, PDF forms, online processes) is likely to be effective in raising the numbers of people claiming and have a concern, in particular, that exclusive online processes could exclude consumers who may not have access to the internet or who prefer to use paper forms.

Examples of significant improvement to paper forms

2.39 TOCs, in the main, responded positively to the feedback from the Plain English Campaign and made changes to the layout and language of their paper claim forms. The examples below demonstrate some improvements that have been made:

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[30] In particular the Plain English Campaign review.

[32] Chiltern Railways, Grand Central and Merseyrail use multipurpose contact forms whereas Heathrow Express and Transport for London Concession TOCs (TfL Rail and London Overground) do not use paper forms at all.

Figure 2.1 South West Trains printed compensation form January 2016

WE WELCOME YOUR FEEDBACK

South West Trains is committed to providing excellent customer service. To assist us in achieving and maintaining this, we would like to hear your comments and suggestions regarding our service.

You can speak with any team member of South West Trains, call our Customer Service Centre on **0345 6000 650** or email **customerrelations@swtrains.co.uk**

Alternatively you may wish to complete this form and post it to:
Customer Service Centre, South West Trains, Overline House, Southampton, SO15 1GW

CONTACT DETAILS

Initials .... ☐ Mr ☐ Mrs ☐ Miss ☐ Ms

Surname ....

Address ....

Town/City .... County .... Postcode ....

Daytime telephone ....

Email ....

JOURNEY DETAILS

From .... To ....

Date .... Time ....

Ticket Type .... Season Ticket No (if applicable) ....

Have you discussed your issue with a team member of South West Trains? ☐ Yes ☐ No

If YES, please give details (case or reference number) ....

Are your concerns relating to:

☐ Compensation/refund request ☐ Train service performance ☐ On train service quality ☐ At station service quality

☐ Feedback on team member ☐ Information ☐ Safety ☐ Other

PLEASE ENCLOSE YOUR TICKET(S) WITH THIS FORM OR PHOTOCOPY IF SEASON TICKET.

YOUR COMMENTS

....

....

....

....

....

....

....

....

....

Signed   Date

If you do not wish to receive information on offers on South West Trains or other third parties by post or email please tick this box. ☐

Follow us on Twitter at **@SW_Trains** or visit **southwesttrains.co.uk**

SOUTH WEST TRAINS

SWT 180

Figure 2.2 South West Trains printed compensation form - November 2016

A dedicated information poster or contact card

2.40 Posters and other printed materials at stations can be a good communication tool. Over half (53 per cent) of passengers surveyed in the recent passenger research felt that a poster at the station was the best way to inform them about their right to claim compensation following a delay.[33]

2.41 Our July/August audit discovered a huge variation in the quality and volume of printed information such as posters or customer contact cards (the latter handed out at stations and/or on trains generally during times of disruption and which signpost passengers to where further information can be found about delay compensation). For example the audit identified that some TOCs only added information about delay compensation to more generic customer communications or did not provide any customer contact cards. This risks the information being ignored or not seen. We will be re-visiting the availability and quality of printed information such as posters at stations and trains in our mystery shopping research in 2017.

2.42 There has been a rise nonetheless in the number of TOCs that now have posters or contact cards. Sixteen of the TOCs we audited in November had dedicated posters or customer contact cards, seven more than from our July/August audit and a number of the posters and contact cards that we have seen recently have been well designed and clear. See examples below.

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[33] http://www.transportfocus.org.uk/research-publications/publications/rail-delays-compensation/.

Figure 2.3 Current Delay Repay passenger information poster from Southeastern

Figure 2.4 c2c information poster

Figure 2.5 Current dedicated contact card given to passengers during delays by Arriva Trains Wales

Figure 2.6 Virgin Trains West Coast Passenger information card

PDF forms on websites

2.43 Whilst many passengers will prefer the easier and quicker method of filling in an online claims form, PDF forms can be a useful resource for people who prefer to fill in a manual form but have not been able to pick up a paper form from a station. The number of TOCs that have a PDF form on their website has increased from 11 in March 2016 to 16 in November 2016. Some TOCs argue that once they have an online process, passengers no longer need or use the more cumbersome PDF process. We wish to see TOCs providing different ways to claim compensation that suits the needs of all of their passengers and take the view that currently the PDF form is a useful and a preferred method of claiming for some groups.

Websites

2.44 The content, navigation and layout of many website sections on delay compensation have been improved, with a significant number of TOCs adding a dedicated tab for delay compensation on to their homepage or within one or two clicks. There have also been a number of changes to simplify and improve online information about delay compensation and the location of online forms. As of November 2016, 16 more TOCs than previously have a direct link to delay compensation from their homepage, leaving four who still do not.

2.45 We will be speaking to TOCs that do not have a direct link from the homepage to understand the reasons for this.

A dedicated online claims process

2.46 Online claims processes are a convenient and popular way for many passengers to claim compensation. The recent passenger research found that nearly a third (31 per cent) of eligible passengers who claimed delay compensation did so online via the train company's website or via an app[34].

2.47 The best examples of online forms are clearly designed and embedded into the dedicated delay compensation webpages although many TOCs have easily located links that take the passenger to a separate page.

2.48 Our initial July/August audit found that there has been a small increase in the number of TOCs that had dedicated online application processes; with at least two adopting an online process as part of a new franchise agreement in spring 2016. By November 2016 only two TOCs[35] were found to be without a dedicated online claims process with only one TOC had no online form at all.

2.49 The one TOC that has no online claims process has informed us they are developing an online claim process and plan to launch it in late 2016.

We will raise and clarify our further concerns with specific TOCs. We will reiterate the regulatory position and our powers where appropriate.

New technology

2.50 Automatic compensation provides clear customer benefits and the recent passenger research indicated that 40 per cent of passengers eligible for compensation would

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[34] http://www.transportfocus.org.uk/research-publications/publications/rail-delays-compensation/.

[35] Heathrow Express and Chiltern Railways have multipurpose online contact forms whilst Merseyrail did not have an online claims process at the time of our 4 November audit but have since informed us they launched an online process in December 2016.

prefer compensation to be automatically paid to their bank card, smart card (e.g. Oyster, Keycard or similar) or to their online account[36]. As of November 2016 automatic compensation is offered by three TOCs.[37]

2.51 Apps are used by almost all TOCs, (20 TOCs have some form of mobile app), but some have functionality that is limited to displaying train times and buying tickets. From our November audit we found that 12 TOCs had mobile apps that allowed passengers to claim delay compensation directly from their mobile phone.

2.52 We expect to see an increase in TOCs making use of new technology and offering services such as automatic compensation in the future given the policy decision by the DfT to include such new initiatives within some future franchises, with one TOC confirming that they will be launching automatic compensation in 2017 as part of its new franchise agreement. We also note the willingness of other TOCs to explore the possibilities offered by smart technology.

The method of payment of compensation

2.53 In our response report, we noted that the way in which compensation is paid has an impact on passengers' propensity to claim and that many would prefer to receive compensation by methods other than vouchers, particularly by way of a bank transfer or refund to their credit card, if that was the method used to pay for their ticket.

2.54 In addition, the CRA which came fully into force for rail passenger services on 1 October 2016, requires, where it applies, that compensation be paid using the same method of payment as the consumer used to pay for the service (unless the consumer expressly agrees otherwise).

2.55 We have therefore been working with RDG, DfT, and TOCs to develop an approach that offers passengers a wider range of payment methods that better suits their needs, and is compliant with the law.

2.56 One of the challenges has been in aligning the requirements of the CRA with the pre-existing contractual arrangements between train companies and franchise authorities and industry specific arrangements, which are different both in scope and what they require.

2.57 For example, Delay Repay compensation schemes, which are part of most franchised train companies' contracts with the franchising authority, entitle passengers to compensation regardless of the reason for the delay, while the CRA

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[36] http://www.transportfocus.org.uk/research-publications/publications/rail-delays-compensation/.

[37] All three of the TOCs that offer automatic compensation only give it to certain groups of passengers. Virgin Trains West Coast offers it to passengers who purchase advance tickets via their website, c2c offers it to holders of a smart card and TfL can offer automatic compensation to passengers, via their smart or contactless cards, after specific delay incidents.

only entitles passengers to money back where the service provider is at fault for not performing the service with reasonable care and skill. Other challenges the industry had to tackle include those outlined in our response report, particularly with regard to being able to pay compensation to debit/credit cards where the train company paying compensation did not sell the ticket and does not have the payment details for the passenger.

2.58 The result of this work is that, as of 1 October 2016, passengers now have a wider range of means by which they can choose to receive compensation for delay.

2.59 For example, the revised National Rail Conditions of Travel (NRCoT) now, rather than offering Rail Travel Vouchers as the default, require train companies to offer as a minimum at least one 'money option', which includes a cheque, a bank (BACs) transfer, or a payment to a debit or credit card.

2.60 In addition to this, where the delay is a result of the service not having been performed with reasonable care and skill due to the fault of the TOC, passengers now have an absolute right to have their compensation paid in the same method of payment as they used to make their purchase.

2.61 Following the changes to the NRCoT taking effect on 1 October, alongside the CRA coming into force in rail, we have been reviewing train companies' websites and claim forms to see what payment options they are offering and how they present these to passengers (see table in Annex B).

2.62 Train companies have made real improvements in the methods of payment that they offer and many have gone beyond the minimum required by the NRCoT and offer a wider range of payment methods, as standard, across all their claims' routes (e.g. both online processes and paper forms). Others offer a more limited range as standard, or via some claims routes, but provide alternative payment options on request.

> **We will meet with TOCs where we have residual questions about the availability of certain methods used to make compensation payments, such as refunds to debit and credit cards, and/or the clarity of the information provided about the options available.**

Improved monitoring and transparency of information

2.63 We have worked with the DfT, passenger groups and TOCs to increase and improve the data and information that is available to monitor progress in passenger awareness and take up of compensation. We are, for example:

- awaiting the results of RDG's research on passenger awareness which it will use to test whether there has been an increase in awareness following its national promotional campaign; and

- committed to carrying out a further mystery shop by the end of March 2017.

2.64 From 1 April 2016 we have also added six new categories to our core data complaints monitoring to gather more detailed information on complaints about delay compensation schemes. This provides us with greater evidence on the passengers' experience and perceptions of how these schemes are publicised, accessed and administered. This new data was published for the first time in our Quarter 1 2016-17 Rail Passenger Service Complaints statistical release on 20 October 2016[38].

2.65 In June 2016 we wrote to TOCs asking for their comments on a proposed framework to collect and analyse data on the 'compensation gap' between delay compensation due and delay compensation paid to passengers. In essence our proposal was to carry out a refined repeat of the exercise that we undertook in support of our response report. Most TOCs, accounting for around 80 per cent of the compensation paid by franchised TOCs, did not object to this proposal, but others were more negative, in particular expressing concerns about the potential for misleading comparisons to be made between TOCs. We note in this regard that new data published by DfT on 27 November 2016[39] provided details of delay compensation payouts for all of the English and Welsh TOCs up to the end of 2015/16.

2.66 Having considered stakeholder responses to our proposed approach on monitoring the 'compensation gap' we plan to proceed with our June 2016 approach, but do not plan to publish any TOC specific estimates of the compensation gap without further engagement with the relevant stakeholders.

We will report on our further progress, including updated estimates of the overall compensation gap (i.e. the difference between compensation that is due and compensation that is paid) in our Annual Consumer Report in 2017.

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[38] http://orr.gov.uk/statistics/published-stats/statistical-releases.

[39] https://www.gov.uk/government/publications/train-operating-companies-passengers-charter-compensation.

Annex A - Changes made to online and printed information since publication of ORR's response report [40]

	Dedicated paper claims form		Dedicated poster or contact card		Direct link from homepage		PDF delay claim form on website		Dedicated online claim process	
	Mar 2016	Nov 2016	Mar 2016	Nov 2016	Mar 2016	Nov 2016	Mar 2016	Nov 2016	Mar 2016	Nov 2016
Arriva Trains Wales	✓	✓	✓	✓	✗	✓	✓	✓	✗	✓
c2c	✓	✓	✓	✓	✗	✓	✗	✓	✓	✓
Caledonian Sleeper [41]	✓	✓	✗	✗	✗	✓	✓	✓	✗	✓
Chiltern Railways	✗	✗	✗	✗	✗	✗	✗	✓	✗	✗
Cross Country	✓	✓	✗	✗[42]	✗	✓	✓	✓	✓	✓
East Midlands Trains	✓	✓	✗	✓	✗	✓	✓	✓	✓	✓
Govia Thameslink Railway [43]	✓	✓	✓	✓	✗	✓	✓	✓	✓	✓
Grand Central	✗	✗	✗	✗	✗	✓	✗	✓	✓	✓
Greater Anglia	✓	✓	✗	✓	✗	✓	✓	✗	✗	✓
Great Western Railway	✓	✓	✗	✓	✗	✓	✓	✓	✗	✓

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[40] The information in this table is based on the findings from our audit on 4 November. TOCs were given a chance to review this on 14 December 2016 and three TOCs provided updates about changes to the information available to passengers from December 2016.

[42] Cross County has now introduced a dedicated contact card.

[43] Includes Southern, Great Northern, Thameslink and Gatwick Express.

	Dedicated paper claims form		Dedicated poster or contact card		Direct link from homepage		PDF delay claim form on website		Dedicated online claim process	
	Mar 2016	Nov 2016	Mar 2016	Nov 2016	Mar 2016	Nov 2016	Mar 2016	Nov 2016	Mar 2016	Nov 2016
Heathrow Express	✗	✗	✗	✓	✗	✓	✗	✓	✗	✗
Hull Trains	✓	✓	✗	✗	✗	✗	✓	✓	✗	✓
London Midland	✓	✓	✓	✓	✗	✓	✓	✓	✓	✓
Merseyrail	✗	✗	✓	✓	✗	✓	✓	✓	✗	✗[44]
Northern	✓	✓	✗	✓	✗	✓	✗	✓	✓	✓
ScotRail	✓	✓	✗	✗	✗	✓	✗	✗[45]	✓	✓
Southeastern	✓	✓	✓	✓	✗	✓	✓	✓	✓	✓
South West Trains	✗	✓	✗	✓	✗	✓	✗	✓	✗	✓
Transpennine Express	✓	✓	✓	✓	✗	✗	✗	✗	✓	✓
TfL Rail Services London Overground and TfL Rail	✗	✗	✗	✓	✗	✗	✗	✗	✓	✓
Virgin Trains East Coast	✓	✓	✓	✓	✓	✓	✗	✗	✓	✓
Virgin Trains West Coast	✓	✓	✓	✓	✓	✓	✗	✗	✓	✓

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[44] Merseyrail has now introduced an online claims process.

[45] Scotrail has now added a PDF form to its website.

Annex B - Information provided by TOCs about the method of compensation payment [46]

	Cash / cash alternative			Payment to credit / debit card	Other
	Cheque	**Exchangeable Voucher**	**BACs**		
Arriva Trains Wales	✓	✓	✓	✓	• **National Rail Travel Vouchers**
c2c	✓	✓	✗	✓ (via online claim process only)	• **National Rail Travel Vouchers**
Caledonian Sleeper	✗	✗	✓	✓	• **National Rail Travel Vouchers**
Chiltern Railways	✓	✗	✓	✗	• **National Rail Travel Vouchers**
	Passengers advised that they may have a statutory right to payment in the same form as used to make the purchase and to contact customer services if advertised methods are not acceptable.				
Cross Country	✓	✗	✓	✗	• **National Rail Travel Vouchers**
	Passengers advised that they may have a statutory right to payment in the same form as used to make the purchase and to contact customer services if advertised methods are not acceptable.				
East Midlands Trains	✓	✗	✓	✗	• **National Rail Travel Vouchers** • **PayPal**
	Passengers advised to contact customer services if advertised methods are not suitable.				

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[46] Information correct as of 9 December 2016.

	Cash / cash alternative			Payment to credit / debit card	Other
	Cheque	**Exchangeable Voucher**	**BACs**		
Govia Thameslink Railway[47]	✓	✓	✓ (via online claim process only)	✓ (via online claim process only)	• **E Voucher** • **PayPal**
Grand Central	✓	✗	✗	✗	• **National Rail Travel Vouchers** • **PayPal** • **Grand Central Ticket**
	Passengers advised that they may have a statutory right to payment in the same form as used to make the purchase and to contact customer services if advertised methods are not acceptable.				
Greater Anglia	✓	✗	✗	✓ (via online claim process only)	• **National Rail Travel Vouchers** • **PayPal**
Great Western Railway	✓	✓	✗	✓	• **National Rail Travel Vouchers** • **E Vouchers**
Heathrow Express	✓	✗	✗	✓	
Hull Trains	✓	✗	✓ (via paper claim form only)	✓ (via paper claim form only)	• **National Rail Travel Vouchers** • **Hull Trains Voucher** • **E Voucher**

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[47] Includes Southern Trains, Great Northern, Thameslink and Gatwick Express.

	Cash / cash alternative			Payment to credit / debit card	Other
	Cheque	**Exchangeable Voucher**	**BACs**		
London Midland	✓	✓	✓	✓ (via online claim process only)	• **PayPal** • **Credit to LM account**
Merseyrail	**Claim form offers compensation in original method of payment or a voucher.**				
Northern	✓	✓	✘	✘	• **National Rail Travel Vouchers** • **Free ticket anywhere on the Northern network**
	Passengers advised that they may have a legal right to payment in the same form as used to make the purchase and to contact customer services if advertised methods are not acceptable.				
Scotrail	✓	✓	✘	✓	• **PayPal**
Southeastern	✓	✓	✓ (via online claim process only)	✓ (via online claim process only)	• **PayPal** • **E Voucher**
South West Trains	✓	✘	✘	✓	• **National Rail Travel Vouchers** • **PayPal**
Transpenine Express	✓	✘	✘	✓ (passengers must call to request or provide a phone number)	• **National Rail Travel Vouchers** • **E Voucher**
TfL Rail Services London Overground and TfL Rail	**Refunds for delays can be applied for online (for customers with a contactless or Oyster account) and customers can opt for a PAYG credit, credit to online account, or credit to a bank account (customers can also apply in writing to Customer Services).**				

	Cash / cash alternative			Payment to credit / debit card	Other
	Cheque	**Exchangeable Voucher**	**BACs**		
Virgin Trains East Coast	✓	✗	✓	✗	• **National Rail Travel Vouchers**
	Customers advised to contact the customer solutions team if an acceptable method is not listed.				
Virgin Trains West Coast	✓	✗	✗	**Via Automated Delay Repay only (for Advance tickets booked through Virgin Trains only).**	• **National Rail Travel Vouchers** • **PayPal**
	Customers advised to contact customer services if acceptable method not listed.				