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Head of Consumer Policy

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22 December 2020

Bob Morris
Chief Operating Officer
TfGM
By Email



Dear Bob,

Approval of Transport for Greater Manchester's Complaints Handling Procedure for Horwich Parkway station (Condition 6 of the Station Licence)

Thank you for submitting Transport for Greater Manchester (TfGM)'s draft Complaints Handling Procedure (CHP) for Horwich Parkway station for approval.

I confirm that we have reviewed your CHP against the 2015 "Guidance on complaints handling procedures for licence holders" (the guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your station licence. We also sought views on your draft CHP from Transport Focus.

We welcome your commitment to respond to 90% of complaints within 5 working days of acknowledgement, which we believe is likely to be positive for passengers.

A copy of TfGM's revised CHP is attached to this letter, and will be published on our website along with a copy of this letter.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'M. Clements', written in a cursive style.

Marcus Clements



Transport for
Greater Manchester



Customer service policy

How we handle complaints about our services
at Horwich Parkway station

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Customer complaints handling procedure

Welcome to Transport for Greater Manchester. Our complaints handling procedure is designed to provide you with information about the ways you can contact us and the steps we will take to try to resolve your complaint. Transport for Greater Manchester operates and manages Horwich Parkway Station and we are delighted about the transformation we're planning to bring to Greater Manchester.

Introduction

We put customers at the heart of what we do. Sometimes we can get it wrong and if we do, we want to hear from you to make it right. This document describes what you should expect and the procedures we will adopt when dealing with complaints.

We value customer feedback to improve our services and will provide information to help you comment on our services and facilities. Our complaints handling procedure (CHP) is available on request from our Customer Engagement Team who will give you the link to download it through the website tfgm.com/public-transport/train/contact

A complaint is defined as: "any expression of dissatisfaction by a customer or potential customer about service delivery or about company or industry policy". In addition, the National Rail Conditions of Travel detail your entitlements if the service is not to the standard you expect. These are available from any National Rail staffed station, or online at nationalrail.co.uk/times_fares/conditions-of-travel.aspx

We also consult with Transport Focus and the Office of Rail and Road (ORR) on an annual basis when reviewing and updating our CHP, although our CHP will only be re-submitted to ORR for approval if material changes are required. If you require a copy of the policy in an alternative accessible format such as large print or in another language you can also request this from our Customer Engagement Team (see customer engagement team section).

Principles

We will ensure that contacting us is easy and our details are well publicised. We will reply to all complaints and claims in a timely and helpful way, addressing each substantive issue raised and acting to put problems right. We train our staff to handle complaints fairly and efficiently; trying to solve any problems there and then.

How to contact us

We empower and encourage our staff to resolve any problems or complaints that you may have about our service immediately so if you can please do speak to our staff in the first instance. If they are unable to resolve the matter, the help of a manager or supervisor may be required. However, if they cannot fully resolve the issue, please contact our UK based Customer Engagement Team, who can assist you.



Customer engagement team

Our Customer Engagement Team is responsible for handling all customer enquiries and complaints by email, telephone, letter or web form. Our Customer Engagement Team is there to help you and there are several ways to get in touch:

By phone **0161 244 1000**

Open Monday to Friday: 7am to 8pm

Weekends and bank holidays: 8am to 8pm (outside of these hours callers will be met with a recorded message which clearly sets out opening times).

Webform [tfgm.com/contact-form](https://www.tfgm.com/contact-form)

Twitter @OfficialTfGM

By Email customer.relations@tfgm.com

Social Media links [news.tfgm.com/contact-us/social-media](https://www.news.tfgm.com/contact-us/social-media) Our social media team may send a link regarding any complaints that require investigation, so you can get in touch with the Customer Engagement Team for a more detailed and personal response.

By Post

Complaints and enquiries
Transport for Greater Manchester
2 Piccadilly Place
Manchester M1 3BG

Accessibility and reach

We publish our contact details around the network:

On our 'Station Information' posters displayed at all stations managed by us, we will give the address and telephone numbers of the Customer Engagement Team.

Additionally, our stations will display the contact details of all other principle train operators that operate in the Transport for Greater Manchester area.

In person

If you are dissatisfied or further investigation is required, then our employees will either tell you how to contact the Customer Engagement Team or help you complete a comments/complaints form, which will then be forwarded to our Customer Engagement Team.

Our Customer Engagement Team will:

- contact you to acknowledge they have received your complaint (you will receive an auto acknowledgement via email/post); and
- write to you with a full response to your complaint, which we aim to send to you within five working days of acknowledgement but failing that we will get in touch to explain if it will be longer.

Occasionally, we will need more time to investigate your complaint; if so we will write to you within five working days to explain why we need more time and when you will next hear from us.

Direct and indirect contact in writing or by telephone

You can make direct contact with us by using our website or by writing or phoning our Customer Engagement Team. You can also contact us using the webform available on the website.

Correspondence received by the Customer Engagement Team will be registered on the database and dealt with in the order in which it is received.

By customer comments or complaints form

Customer comments/complaints forms are available online and when requested from our managed station(s) or from any Transport for Greater Manchester Travelshop. At our Transport Interchanges staff will direct you to the online link or to the Customer Engagement Team contact number.

Online list of Travelshop locations

[tfgm.com/public-transport/travelshops](https://www.tfgm.com/public-transport/travelshops)

Further investigation

The Customer Engagement Team will arrange a full and fair investigation of your complaint wherever necessary. We will investigate complaints thoroughly, seeking clarification from you when necessary.

The more information you give us about your complaint, the sooner we can get back to you with a full reply. Please ensure you include the following details:

- The time and date of your journey.
- A detailed description of the series of events that took place.
- The stations you travelled to and from.
- Copies of your tickets and any other documents that might help us identify trains or staff involved (this is not essential but helpful where possible).
- Any additional information that you feel will help us investigate the complaint.

Once we understand the key issues, we will identify facts that need to be checked. We will collect evidence and interview employees if required. Our objective analysis will include a review of all relevant policies and procedures. We will form a fair and unbiased view about what you should have expected and what happened in practice.

We will give you a full explanation, detailing our findings and where appropriate offer an apology and look to improve our service. If the failure occurred at our station or as a result of a member of TfGM staff which caused consequential financial loss our team will investigate, if necessary, an appropriate level of compensation may be offered. The explanation will be provided in plain English and free from jargon.

If your complaint includes more than one issue, we will deal with each one this way. We log every complaint with a unique reference number on our database. This means that we can keep track of our progress in dealing with your complaint and check that we're keeping to our targets for response time.

We will also ensure that the right people within our organisation investigate to help us resolve a complaint and to make sure that we work to prevent a reoccurrence in the future.

If detailed investigations are required, we will let you know if there is a delay and keep you updated but will endeavour to adhere to our normal timing commitments wherever possible.

Customers with additional needs or whose first language is not English

We understand some people have specific requirements or their first language is not English and they may have difficulty communicating with us. We handle these cases sensitively and give our responses in an appropriate format. We are happy to correspond with you through your preferred means of communication (such as telephone, letter, email). We can also provide documentation in printed copy, large print and audio formats within seven working days of your request. For any other alternative formats, please contact our Customer Engagement Team. Alternatively, we can accept complaints or feedback from guardians, carers or support workers on your behalf (with your permission or authority).

Confidentiality

We will respect confidentiality in line with the General Data Protection Regulation (GDPR). If you contact us but your complaint relates to the goods or services of another train operating company then we will send your complaint on to them in a timely manner.

We will let you know when we send it on and supply contact details for the train operator concerned. Your details may also be forwarded to the Customer Engagement Team by other train operating companies, and by National Rail Enquiries in order for us to fulfil our obligation to respond to you. This may happen if a journey involves more than one train operator or if your case is escalated to Transport Focus.

Your personal details, or details about your complaint, will not be shared with third parties unless we have your consent in writing or it is necessary to fulfil our own obligations. These obligations may be to Members of Parliament, the Department for Transport, other train operators, Transport Focus or the Office of Rail and Road. This includes other bodies carrying out statutory duties such as the police.

We will only use the information you provide as permitted by the General Data Protection Regulation (GDPR), and we will only share or disclose your information in accordance with the DPL and will obtain your consent where we are required to do so. We will only use third parties to process information where we are satisfied that they comply with these standards and can keep your data secure. Full details are provided in our Privacy Policy, which can be found on our website [tfgm.com/privacy-policy](https://www.tfgm.com/privacy-policy).





Putting things right

We will contact you to acknowledge that we have received your complaint (you will receive an auto acknowledgement via email); and write to you with a full response to your complaint, which we aim to send to you within five working days of acknowledgement but failing that we will get in touch to explain if it will be longer.

Occasionally, we will need more time to investigate your complaint; if so, we will write to you within five working days to explain why we need more time and when you will next hear from us. TfGM is required to provide a full response to 95% of all complaints within 20 working days.

Although our commitment (key performance indicator) is to make a full response to 90% of all complaints within five working days of acknowledgment.

Our objectives are:

- To provide a response which is easy to understand.
- To fully investigate all complaints in a sympathetic, fair, timely and courteous manner.
- To provide consistency in approach throughout the company when responding to customers.
- We will only consider a complaint as resolved when we have no outstanding actions to perform.

Complaints escalation procedure

Please give us the opportunity to try to resolve your complaint. If you feel that our written response has not resolved your complaint, you can reply to our Customer Engagement Team. They will arrange for the appropriate senior manager to review your complaint before writing to you with a final response.

Additionally, you have the right to appeal to the Rail Ombudsman. The Rail Ombudsman is there to help resolve unresolved complaints/disputes. 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 decide based on the evidence they've received. If you agree with their decision, then we must 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 in 2018.

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.

The Rail Ombudsman can be contacted via:

Website railombudsman.org

Webform railombudsman.org/contact-us/

Telephone **0330 094 0362**

Textphone **0330 094 0363**

Email info@railombudsman.org

Twitter [@RailOmbudsman](https://twitter.com/RailOmbudsman)

Post:

**FREEPOST-RAIL OMBUDSMAN
Rail Ombudsman
1st Floor Premier House
Argyle Way
Stevenage
Hertfordshire SG1 2AD**

The Ombudsman Contact Centre Team are available Monday to Friday 9am – 5pm

Acting fairly and proportionately

When reviewing complaints, we will form a fair and unbiased view about what you should have expected and what happened in practice. Some complaints can be resolved easily and quickly. However, for more complicated or serious complaints we will investigate fully the issues raised.

This will include:

- Analysis of the complaint.
- Evidence gathering.
- Analysis of evidence.
- Determining what should have happened.
- Identifying the cause of the failure.
- Response and lessons learned.

Frivolous and vexatious complaints

We reserve the right to terminate any correspondence or communication that we reasonably deem to be abusive, bullying, repetitive, frivolous or vexatious, and which specifically diverts resources and affects the operation of the Customer Engagement Team. This decision will be made by our Customer Engagement Team Manager. We will consult with Transport Focus when considering whether to deem a complaint as frivolous or vexatious.

Please also note that in cases where complaints are terminated on these grounds the complainant will be advised of the contact details of the Rail Ombudsman for further assistance as required.

The Rail Ombudsman will assess each claim on its merits and more information on its process and remit can be found on the website railombudsman.org

Claiming for losses, personal injury or property damage

If you need to claim for losses, property damage or personal injury, please write to or email our Customer Engagement Team. Please also make our staff aware straight away of any injury or damage that you or your property sustains whilst travelling through our stations. Letting our staff know if there has been an issue will allow them to make areas safe and prevent anyone else suffering injury or damage.

Where possible, we will aim to resolve your complaint personally but there are times when we may need to pass your details on to our claim handlers. If this is required, we will ensure that this is done and inform you of the status of your case. The rail industry has a statutory arrangement, called the Claims Allocation and Handling Agreement (CAHA). Claims for losses, property damage or personal injury should be made in writing to our Customer Engagement Team who will acknowledge it within five working days and ensure it is forwarded promptly to our claims team. The rail industry must comply with the CAHA and your claim will be dealt with in accordance with this agreement.

Lost property

There is nothing worse than leaving things behind. We want to reunite you with your lost or mislaid items as quickly as possible. If you think that you have left something at our station, contact us and we'll search all of the items handed in.

To report a lost item please contact staff at our station, or alternatively contact the Customer Engagement Team (see page 4 for contact details). When you report a piece of lost property, there are a few things that we will need to help us track down your things. The following details are therefore really useful:

- Your departure or arrival time at our station.
- The time and date of your journey.
- A good description of your lost item including size, colour, make and any distinguishing features.
- Your name and contact number.

Penalty fares

Transport for Greater Manchester does not deal or handle Penalty Fares Notices or payments. If you have received a Penalty Fare Notice, please refer to the appeals body detailed on the notice.

You can find contact details and how to appeal or pay a notice at penaltyservices.co.uk or write to:

Penalty Services Ltd
12 Deben Mill Business Centre
Old Maltings Approach
Melton Woodbridge
Suffolk IP12 1BL

Please ensure that you quote your reference number on all correspondence.



Ownership of complaints

We will respond directly to complaints made about the stations we manage. We will also deal with all complaints relating to ticket sales when we have sold the ticket. If you have bought the ticket from a third-party retailer or another train company, you should direct your complaint to them in the first instance.

Complaints about other train companies

Complaints referring or relating to another station operator, Network Rail operated station or a train company that are brought to our attention (but do not relate to Horwich Parkway station), will be acknowledged in the normal way:

- You will be advised that your comments have been sent on to the relevant organization.
- Their contact information will be given in our response to you.
- The correspondence will be forwarded to the relevant company within five working days of receipt.
- We will request that they respond directly to you, and ensure we contact you to confirm this has been carried out.

If your complaint involves a journey that features more than one rail company and directly relates to Horwich Parkway station, we will liaise with the other companies involved to ensure you receive a coordinated response to ensure there is one point of contact.

Complaints about other transport providers

If complaints relate to other transport providers (e.g. a bus operator or tram operator), we will explain this in our reply to you and provide the contact address you need. If the complaint refers to another non-transport organisation, we will also explain this in our reply and try to provide you with the contact address you need.

Complaints about our suppliers

If you make a complaint which relates to a third party supplier who is acting on behalf of us (e.g. car park management, security, cleaning staff or suppliers of rail replacement services), we will work with the provider to thoroughly investigate the details of your complaint and co-ordinate a response accordingly.

Organisation dealing with complaints

The Customer Function through the Customer Engagement Team is managed by the Casework Manager and is responsible for handling complaints. If you make a complaint or provide feedback to us by any contact method, including third party intermediaries (e.g. Resolver), we will enter details, and a full record of any contact made, onto our confidential Customer Management System.

Our team of fully trained Customer Engagement Team employees will review every contact to identify if the content is a complaint about our service. Details are then passed onto the appropriate management team for investigations as well as producing reports. These are then analysed for service improvements and regulatory monitoring.

Electronic forms of all our contact data are held for no longer than six years. If you have provided a daytime telephone number, we may try and contact you by phone to resolve the issue, or obtain further information about your complaint, to assist in the investigation. We will undertake a full and fair investigation into your comments and make every effort to provide answers or explanations to the issues you raise. Wherever possible, a complaint will be handled by an individual member of the team, from receipt to reply.



Training

We are committed to ensuring that all our staff have the required knowledge, skills and empowerment to deal with a complaint about our services. We have an extensive training regime that looks at customer service and we recruit individuals that have the skills to sympathetically deal with a complaint. All employees receive ongoing periodic training to ensure their skills are up to date.

Customer Engagement Team employees receive specific training on our commitments in our Complaints Handling Procedure. TfGM will ensure continued awareness of the contents of the CHP are understood and practiced with all staff who interact with customers (such as our customer engagement team and station staff). This will be carried out in staff inductions and yearly online refresher briefing sessions.

Ongoing training is also provided to ensure our staff handling complaints have the capabilities and competencies to deliver an excellent complaints handling service; this includes telephone/letter writing skills, complaints investigation and resolution skills.

Service standards

We use traditional and innovative channels to collect qualitative and quantitative data to drive customer-focused improvement. The data we gather from direct feedback, complaints, customer satisfaction research and surveys, passenger surveys, stakeholder services, online communities and customer panels helps us truly understand what our customers need and how we can improve our services. These insights are used to inform strategy, make decisions and ensure continuous improvement. TfGM adhere to the ORR Complaints Handling Procedure (CHP) guidance complaint handling service standard see page 7. Please see our website for full details:

[tfgm.com/complaints](https://www.tfgm.com/complaints)

The identification of systematic issues and problems

Customer complaints are collated centrally and used as a source of intelligence and lessons learnt. This helps identify any trends and emerging issues that may need to be addressed.

Complaints about individual staff members will be carefully looked at to identify the wider context surrounding the particular complaint.

TfGM will review any wider issues that may play a role in the wider context of events.

Where complainants have alleged they have sustained an injury as a result of TfGM operations, consideration will be given as to whether the incident is reportable to ORR under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

Reporting and reviewing

We often undertake a review of the services we provide which includes statistical feedback regarding the types of complaints and feedback we receive. This statistical feedback is shared with and used by ORR, Transport Focus and Department for Transport so that we can be benchmarked against other operators and ensure we are dealing with complaints in a way that is fair and transparent.

We also carry out regular reviews of our Complaints Handling Procedure and update it as and when there are any changes to our systems or processes. Reviews will be carried out in consultation with Transport Focus and ORR. We will continue to actively monitor our CHP to make sure that it is effective and continues to comply with industry changes.

Record keeping

TfGM record keeping is set out on our website (see web address below), this details how we collect customers' information. Including: the purposes, the types of personal data and who we share it with. It also details our legal requirements and sets out how we will secure your information under our privacy policy.

[tfgm.com/privacy-policy/customer-relations](https://www.tfgm.com/privacy-policy/customer-relations)

[tfgm.com/privacy-policy](https://www.tfgm.com/privacy-policy)

Organisational culture and structure

Customer experience sits at the very heart of Transport for Greater Manchester's organisational culture. Our structure and internal reporting processes allow for escalation of concerns and a business-wide understanding of areas to improve, as well as a shared vision of our goal to deliver seamless multi-modal travel that drives positive customer journeys.

We believe in an open and honest relationship with our customers, acknowledging the vital impact our staff have on your experience and empowering them to make decisions and actively resolve issues in their remit.

Other useful information

The Assisted Travel Policy will give further information on our policies for supporting disabled customers. Practical information on planning journeys can be found on our website [tfgm.com/accessibility](https://www.tfgm.com/accessibility)

Please contact our Customer Engagement Team if you require these in alternative formats by post.

