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03 March 2016

Linda Gallacher
Head of Customer Service Delivery & Standards
ScotRail

Dear Linda

Approval of Abellio ScotRail Limited Complaints Handling Procedure (Condition 6 of the Station Licence and GB Passenger Statement of National Regulatory Conditions)

Thank you for submitting your draft Complaints Handling Procedure (CHP) for approval. A copy of your revised CHP is attached to this letter, and will be published on our website along with a copy of this letter.

I confirm that we have reviewed your CHP against the 2015 “*Guidance on complaints handling procedures for licence holders*” (the guidance), and can confirm that your revised CHP meets the requirements of Condition 6 of your station licence and GB Passenger Statement of National Regulatory Conditions (SNRP). We also sought views on your draft CHP from Transport Focus.

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

- Your commitment to respond in full to 95% of complaints received within 7 working days.
- Your commitment to provide passengers with a £5 rail travel voucher if you are unable to fulfil your 7 day response target.

We would also like to thank you for being one of the first operators to submit their revised CHP using the updated guidance and for your constructive engagement in this new process.

You have confirmed that where a complaint has not been resolved and your internal procedures have been exhausted, you will provide information on Alternative Dispute Resolution (ADR) to the complainant, in accordance with the Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulations 2015. This information will usually be highlighted to complainants in the second substantive response, when details of Transport Focus are also given. We understand that you will identify an approved ADR provider (in this case Ombudsman Services) but that you do not plan to make use of this provider and instead complainants will be advised to contact the existing passenger bodies. Where a complainant does contact Ombudsman



Services you have an arrangement in place whereby they will be referred to the relevant passenger body. This approach appears to discharge the information requirements in the Regulations, however, we will be engaging with ATOC and the Department for Transport as to the application of the ADR regulations more generally and this may result in the need to revisit policies in due course. You will continue to be engaged with developing thinking through your representation at ATOC.

We note that you have made some interim changes to your website to provide passengers with a clearer path to make a complaint before your substantial website changes are carried out. You have informed us that the substantial website changes will be made in April 2016 in order to ensure compliance with the requirements of the updated guidance. You have committed to creating a "How To Make a Complaint" page on your website which can be found within 2 clicks of the homepage and will include you customer facing CHP document along with a selection of relevant FAQs and "Hot Topics". Please could you inform us when these actions have been carried out, and in any case no later than 30 April 2016.

In the case of ScotRail, the relevant passenger body is Transport Focus. In line with the requirements of the guidance, licence holders must establish an appeals handling protocol where the passenger bodies require this. We understand that these protocols are not yet finalised and are currently in the process of being agreed. Once these protocols are agreed, we expect licence holders to abide by them in their handling of appeals.

Yours sincerely,



Annette Egginton





Customer Complaints Handling Procedure

October 2015

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1. Introduction

When you travel with us you should expect high standards of service throughout. We recognise however, that things might sometimes go wrong. We have produced this Complaints Handling Procedure to help explain what you can expect from us should you need to make a complaint.

A complaint can be described as “any expression of dissatisfaction by a customer or potential customer about service delivery or about company or industry policy.” We know that a high quality Customer Complaints Handling Procedure is key to driving improved customer satisfaction.

Our Complaint Handling Procedure will:

- Be easily accessible, well publicised and easy to use
- Ensure efficient handling of a complaint and provide a response within publicised targets.
- Ensure full and fair investigation
- Compliment our Passenger Charter commitments
- Respect individual’s right to confidentiality in line with the Data Protection Act
- Provide information to management so that improvements can be made and the service continually improved
- Be able to deal with insurance claims made against the company

2. The ScotRail Promise

- We will make sure that our station and on-train staff have the appropriate training and tools to help resolve your complaint on the spot.
- If your complaint cannot be resolved by our frontline staff or managers they will put you in touch with our customer relations team.
- If you are delayed by 30 minutes or more on one of our trains, you can claim compensation under our Delay Repay scheme without having to make a formal complaint. If you have a Season Ticket, please contact customer.relations@scotrail.co.uk to discuss your claim. On top of this, if a delay to a ScotRail train causes you to miss an onward connection and be delayed further, then you can count that as part of your Delay Repay claim. You will be able to apply for your Delay Repay online as well as submitting complaints on line. Delay Repay claim forms will be available on request from any of our staffed stations. You can also visit <https://www.scotrail.co.uk/form/delay-repay>

3. Our Customer Relations Team

We have a specially trained team of Customer Relations advisors dedicated to dealing with your complaint. Our Customer Relations contact details are displayed on posters at stations, on each carriage of all our trains, printed within our Timetables and Passenger Charter and available on our website www.scotrail.co.uk.

It's usually quicker to contact us by phone or online but we will continue to make available other methods of contact, like post, to accommodate your preferences.

Online

You can contact us using one of our online comment forms at www.scotrail.co.uk/contactus

By Email

You can email us at customer.relations@scotrail.co.uk.

By Telephone

You can call us on 0344 811 0141 between 0700 and 2200, 7 days a week. If you call outside of these hours, you will receive a message to call back after 0700 or contact us via www.scotrail.co.uk. Calls are charged at local call rate from a standard landline.

By Post

You can write to us at:
Freepost ScotRail Customer Relations
PO Box 27129
Glasgow
G2 9LH

By Social Media

We use Social Media another way to deliver information to our customers. Come and talk to us by posting to our Facebook page, Tweet us or send us a private message. If we recognise or if you tell us you want to make a complaint, we will send you the link that takes you to our Customer Relations team who will help you through the complaints process. We will reply to as many posts as we can. Please note our staff are important to us and we respect their right to privacy, therefore we won't deal with complaints made about staff on Facebook or Twitter. Any post identifying a ScotRail colleague will be hidden from the page. If you wish to give us feedback on any of our staff, please email customer.relations@scotrail.co.uk

Our Customer Relations team is available between 0700 – 2200 seven days a week with the exception of Christmas Day, Boxing Day and New Year's Day.

4. A Fair Complaints Procedure

We will give a full and fair investigation to any comments and complaints we receive. Where appropriate, we will directly involve our managers and members of the Senior Management team to ensure a consistent approach. This way we can try to avoid the same mistake happening again.

When you send us your complaint, you will receive information as to our timescales and your case reference number. We will continue to converse with you via the channel you contacted us. If we feel we cannot complete a first touch response within 7 working days then we will contact you to inform you of this. We would then look to resolve within 20 days from receipt of complaint. Due to the nature of our complaints, there can be many times we interact with the customer where we are able to keep them up to date and reassure them that we are investigating to their satisfaction.

To help us with this, we ask that you include as much information in your complaint as you can, for example the time and date you travelled, what route you were travelling etc as this will help us with our investigation. If you are not satisfied that we have resolved your complaint, a manager will conduct a further review of your specific concerns and provide their name and position as a point of contact. They will also share with you the contact details of Transport Focus and explain the role that they can play in resolving issues.

For further escalations from this point, you can ask Transport Focus for further help and advice. Transport Focus is an independent body set up by Parliament to protect rail users' interests. They are able to review your complaint and make representation to us on your behalf. We have included their contact details at the end of this document.

Please note that in addition to this, The Alternative Dispute Resolution for Consumer Disputes (Competent Authorities and Information) Regulation 2015 requires us to advise you of an 'Alternative Dispute Resolution' organisation for your complaint. In our case this is The Consumer Ombudsman www.consumer-ombudsman.org. However, as Transport Focus already provide a mediation service for customers in the rail industry, we do not make use of the ADR process and correspondence to the Consumer Ombudsman will be redirected to Transport Focus.

5. Response Times

We will reply to your complaint as quickly as possible. In fact, we aim to reply in full to anything we have received by post, email or via our website within 7 working days. Sometimes however, we might require further time to investigate, so if don't hear from us within 7 working days, we will send you an acknowledgment and will then send you a £5 rail travel voucher as an apology. We will then aim to provide a full and final response within 20 working days. Our 7 day response target is 95% of complaints received.

ScotRail will work closely with Transport Scotland and Transport Focus during periods of increased volumes if there is an inability to meet SLAs.

We aim to answer 75% of incoming telephone calls within 30 seconds. If we cannot immediately resolve the complaint at the time of the call we aim to respond in the timescales mentioned for letters and emails, as detailed above.

6. Complaints involving other companies

If your complaint or claim is about another train company, Network Rail or another agency, we will send it to them on your behalf and write to you with their details within 7 working days. If your journey involves another train company as well as us, we will take full ownership if we are responsible for the main reasons of the complaint and respond in full within 7 working days. If there is any dispute, we will work with the other Train Operating Company or Companies to establish ownership in line with industry guidelines. We will let you know the outcome within 7 working days.

7. Forums and Events

We intend to hold regular forums and events for our customers and shareholders. These events provide an opportunity for you to ask questions, raise issues or make a complaint in person with our Directors, Senior Managers and other members of our team. Dates and locations of these events will be available via our website or from our Customer Relations team.

8. Termination of Correspondence

We reserve the right to terminate any correspondence or communication that could be construed as abusive, offensive or bullying in content. We will fully consult with the Transport Scotland as well as Transport Focus before we terminate any correspondence and we will advise in writing of the reasons behind the decision.

9. Quality of Response

When you complain to us, our aim is to resolve it for you first time round. We aim to use one member of the Customer Relations Team from receipt to reply and to address each substantive point you raise.

10. Complaints about Staff Conduct

All complaints involving staff conduct and safety related matters will be fully and fairly investigated. For reasons of confidentiality, we may not be able to divulge the outcome of any internal disciplinary procedure. Feedback will be provided to relevant management and staff as part of this process.

11. Compensation

We will pay compensation if it's merited, normally in the form of National Rail Travel vouchers, as explained in our Passenger Charter. You may also claim Delay Repay explained in section 2. You will be able to use vouchers to buy rail tickets at any National Rail ticket office in Great Britain or other National Rail appointed travel agents. You may also exchange them for the equivalent in cash at selected ScotRail stations or request a cheque. We are happy to come to a suitable arrangement with you.

We may also consider appropriate goodwill gestures on an ex-gratia basis when we are unable to fulfil our promises to you.

12. Obtaining a copy of our Passenger Charter

You can get a copy of our Passenger Charter via our website <https://www.scotrail.co.uk/about-scotrail/passenger-charter> and from any of our staffed stations or by contacting the Customer Relations team.

13. Monitoring the Quality of our Responses

We monitor the quality of our service through customer satisfaction surveys and customer call backs. We also review the information that we receive from customers who get back in touch to tell us they are not happy about the way their complaint has been handled. We share this information with Transport Scotland and use this information to improve the performance of our Customer Relations Team.

14. Diversity and Equality

We will make provision for customers whose first language is not English, and make our reply in the appropriate language. Also, if you wish a copy of this Complaints Handling Procedure in another format such as large print, please email customer.relations@scotrail.co.uk

We are committed to meet the needs of people with disabilities. We aim to ensure that carers, support workers and guardians are able to act/advocate on behalf of a passenger with the passenger's permission/authority. For more details on how we do this please see our Disabled Peoples Protection Policy <https://www.scotrail.co.uk/plan-your-journey/accessible-travel/disabled-peoples-protection-policy>

15. Confidentiality

We may divulge some or all of your details to a third party without obtaining consent where it is necessary for us to fulfil our own statutory obligations. This includes other train companies, Transport Focus, Transport Scotland, insurers, the ORR or any other such body in order to fulfil the requirement of their duties (e.g. the Police).

16. Management Reports

Customer feedback is important to us. It helps us to identify areas where we can improve the service we provide. To ensure that this feedback received through complaints helps to drive improvements we will:

- Provide regular reports, every four weeks, on complaints trends to managers at all levels to enable them to identify areas in need of improvement and to take remedial action.
- Submit reports every four weeks to Transport Scotland and the Office of Rail and Road on our performance in handling complaints in terms of speed of response and satisfaction ratings of customers who have complained.
- Make specific reports available to senior managers where we feel this will help them improve our performance and satisfy our customers.
- Provide information in the format and at the timescales required by Transport Scotland on the number of comments and complaints we receive, and our performance in dealing with them to Transport Scotland, the Office of Rail and Road and to Transport Focus.

National Rail Passenger Surveys are now being undertaken four times a year. Two are conducted by Transport Focus, an independent consumer organisation representing the interests of rail in Scotland and the rest of Great Britain. The results are published on www.transportfocus.co.uk and www.scotrail.co.uk respectively. A further two are conducted by Transport Focus on behalf of ScotRail. The results are analysed, shared with the

business and subsequently, learnings are taken from both the success areas and the areas for development. A Process Improvement programme then takes place based on these results.

17. Claims for Losses, Property Damage and Personal Injury

If you wish to make a claim against ScotRail for losses, property damage or personal injury this should be made in writing to Customer Relations and will be dealt with in accordance with the National Rail Conditions of Carriage and the ScotRail Passenger Charter. Personal injury claims will be forwarded to ScotRail's claims handlers. Your claim will then be dealt with in accordance with the Claims Allocation and Handling Agreement (CAHA) <http://orr.gov.uk/what-and-how-we-regulate/licensing/licensing-railway-operators/licence-obligations>.

If there are safety implications the details will be passed on to the appropriate department as soon as your claim is initiated.

18. Reviewing Our Complaints Handling Procedure

Our Complaints Handling Procedure will be reviewed each year by the Customer Experience Delivery Group who are responsible for improving quality in our business. This will be carried out in consultation with Transport Focus and Transport Scotland. This Complaints Handling Procedure will not be altered without prior consultation with Transport Focus and Transport Scotland and prior agreement from the ORR.

19. Contact Details

ScotRail Customer Relations

Telephone: 0344 811 0141

Textphone users: 0845 602 0346

E-mail: Customer.relations@scotrail.co.uk

Postal address: Freepost ScotRail Customer Relations
PO Box 27129
Glasgow
G2 9LH

Website: www.scotrail.co.uk.

Transport Focus

www.transportfocus.org.uk

Telephone: 0300 123 2350

E-mail: advice@transportfocus.org.uk

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

Postal address: Freepost RTEH-XAGE-BYKZ
PO Box 5594
Southend on Sea
SS1 9PZ

Complaints Handling Process

Here's How We Train!

Abellio ScotRail

Here's How We Train.

We develop our people so they feel confident, knowledgeable and comfortable with processes.

All staff are trained on:

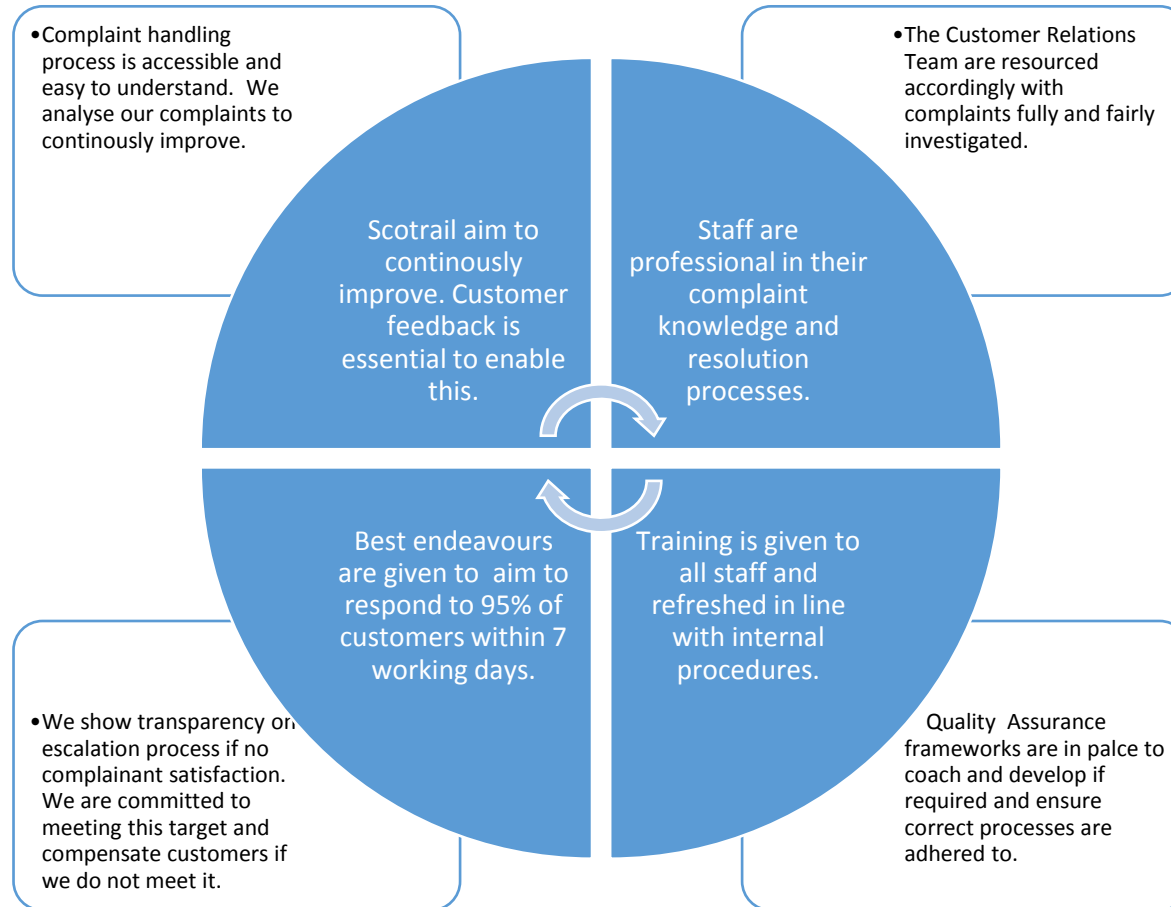
1. How to identify a complaint using “any expression of dissatisfaction” ethos
2. How to manage the customers expectations
3. How to investigate the complaint
4. How to reply attempting first response resolution
5. What to do if the customers is not happy with your response

All staff are trained to:

1. Manage customer complaints received via any channel eg letter, online complaint form, email or telephone call. Is the customer telling us they are unhappy? Are negative words used to describe the customers experience?
2. Inform customer of timescales via auto response email, letter or information during the call.
3. Staff can identify key factors in the complaint to help steer investigation. Use contact list to source relevant resource.
4. Staff reply to customer informing them of investigation findings. Always offer apology.
5. Staff are aware of and can follow escalation process if customer is not happy with outcome.

Here's How We Train

Continuous Learning leading to Continuous Improvement



Here's How We Train!

With a full time trainer on site, this gives us the ability to train, coach and develop staff on a real time basis.

Line Managers monitor staff progress looking at issue identifiers, for example call times, repeat questions or customer feedback. They will then engage with the Training Department as to further requirements.

Buddy/refresher training is given to those who return from mat leave or long term sick.

360 degree feedback is sought by the Trainer as to their performance, quality of knowledge learned, materials and tools used.

How We Train

- Training is completed in 2 tranches by on site trainer.
- Correspondence complaints is trained first, followed by telephony complaints.
- This is delivered in a class room style environment which include role plays, customer scenarios and knowledge checks.

How We Train

- Trainees are shown the best ways to help customers understand our processes eg links to Passenger Charter, Delay Repay, National Conditions of Carriage.
- Trainees are trained on how to write letters, emails based on modules written by Scotrail approved provider "The First Word"
- Trainees are trained on how to identify a complaint by looking at words/language used, the tone, the content and even the handwriting.

How We Train

- "100% quality checking of all work takes place during 6 month probation period."
- Feedback is required from all trainees as to their further requirements.
- Personal Development Plans are updated and checked at monthly 121 meetings.

Here's How We Train

What the customer sees.

- When customer logs a complaint via online form or email, they receive an auto-generated response. This informs them of our target response time SLA's eg aim to respond within 7 working days.
- This response will display their case reference number by which all future communication with the customer is logged on TOC CRM. This keeps an audit trail of all interaction between customer and TOC.
- We always communicate with the customer via the channel they've shown preference to. The same information is provided to them regardless of channel.
- When we realise that their case may involve an investigation, we contact them to let them know that their complaint may take up to 20 working days to resolve.
- If we are experiencing incredibly high volumes or severe disruption then we will contact Transport Focus and the ORR to make them aware. We will also highlight our plans to help remain within SLA or seek approval to operate out with SLA.

Here's How We Train Performance

- 20% calls checked per month per individual
- 20% correspondence checked per month per individual.
- Categories for scoring calls - tone and pace, apology offered, jargon free, correct and necessary referral, correct and necessary request for further information, correct compensation offered.
- Categories for scoring correspondence - polite and positive flow, apology offered, correctly identifies and accurately addresses the customers concern, correct compensation offered.
- If the call has failed as a result of Supplier, called marked as Fault of Supplier (FOS.)
- Target for FOS calls are 0.5%. This target always been achieved.
- Failed areas may result in a higher audit amount eg 50% of work. 121's, coaching or retaining offered on development areas.

Here's How We Train The DPA stuff

- Customer records are held for a period of 6 years in accordance with Data Protection Requirements.
- All customer records are electronic. Any paper mail is assigned to case reference number and scanned to electronic version.
- Paper mail is destroyed securely.
- CRM has been in place since 2013. Files due to be destroyed in 2019.
- Abellio franchise has been in place since 1st April, 2015.
- MI is delivered daily, weekly and monthly to monitor performance.

Here's How We Train

Monitoring Performance

- Management Information is sent on a daily, weekly and monthly basis. This includes reporting on all customer interaction, performance against SLA, inbound and outbound work. How the call centre has performed as a narrative is also supplied.
- Board reports are completed monthly as are various Director Reports.
- Weekly account meetings take place either via the telephone or face to face with call centre managers and Contracts Manager.
- Monthly Account Meetings between Contracts Manager, Head of Customer Service, Marketing and Call Centre Managers to ensure performance is addressed in all areas.