

Annette Egginton

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Directorate of Railway Markets & Economics

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22 August 2016

Ian Bullock
Managing Director
Arriva Trains Wales

Dear Ian

Approval of Arriva Trains Wales Limited Complaints Handling Procedure (Condition 6 of the Station Licence and GB Statement of National Regulatory Conditions: Passenger)

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

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

- Your Customer Panels, that are representative of the customers travelling on your network, and meet on a quarterly basis to highlight the thoughts and opinions of passengers and help to shape and prioritise plans accordingly. You have also stated that the Panels carry out mystery shopping exercises every month, with the results discussed at your customer experience strategic meeting.

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, trading as the Consumer Ombudsman) 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.

In the case of Arriva Trains Wales 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





How to make a complaint

Introduction

Providing an excellent customer experience is central to the Arriva Trains Wales vision.

We recognise that sometimes things may go wrong and we want to ensure you can easily let us know when you are not satisfied with the service we have provided.

Your opinions count and are central to ensuring that we deliver the service you require. We have therefore designed this complaints process overview to help you give us your feedback and tell us what you expect. Our guide outlines the following:

- How to make a complaint
- How we will investigate the complaint
- When you can expect a reply to the complaint
- How you can escalate the complaint if you are unhappy
- What we do with the complaint data
- How we use customer complaints to drive continuous improvements
- How we ensure a quality complaints handling service is provided

This guide on how to make a complaint is available on our website (www.arrivatrainswales.co.uk) or by contacting our Customer Relations team who will send you a copy upon request. A copy of this document will also be made available on the website of the Office of Rail and Road (www.orr.gov.uk)

We will review this procedure every twelve months as a minimum. When doing so, we will consider any suggestions for improvement made by customers and other stakeholders.

When proposing changes to this procedure, we will obtain the approval of the Office of Rail and Road and also consult with Transport Focus.

We define a complaint as *“any expression of dissatisfaction by a customer or potential customer about service delivery or company or industry policy”*.

Whilst all expressions of dissatisfaction are deserving of a response, for the purposes of clarity we distinguish between a complaint and feedback based on what is covered within the scope of this document. We monitor feedback as it provides us with valuable insights into our performance; it can adversely affect our reputation, and may influence future service and delivery methods.

Feedback can be positive, negative or neutral about the service we provide but may not necessarily require corrective action, a change to our services or formal review of a decision. We gather and monitor feedback via social media and online forums, the results of post-travel customer surveys and by listening to what our staff and customers tell us. If we feel that feedback could be characterised as a complaint we will direct you to use our formal complaints procedure, and also endeavour to provide responses to all items of feedback received.

Easily accessible to all

We want to make it as easy as possible for you to make a complaint using your preferred contact method, and the one you are most comfortable in using. To assist you there are a number of ways you can contact us:

In person at a station

We always encourage our customer facing staff to try and resolve problems immediately wherever possible. If they are unable to do so, they will provide you with the contact details for the Customer Relations team so that your complaint can be progressed using our complaints handling procedure.

Contacting our Customer Relations team

We employ a team of dedicated Customer Relations staff specifically for the purposes of receiving, investigating and responding to comments, complaints and suggestions. We will take all reasonable steps to ensure that customers with specific needs are catered for when contacting us. For example, we will use the services of a translator to ensure that customers whose first language is not English can correspond with us easily. A Textphone service is also available via our Assisted Travel team between 0800 and 2000 seven days a week at 0845 758 5469.

If you wish to make a formal complaint, you can contact the Customer Relations team by:

Telephone: 03333 211202

The team is available from 0800 until 2000hrs Mondays to Saturdays, and from 1100 until 2000hrs Sundays. The Contact Centre provides an English

and Welsh language service (If you prefer to talk to us in Welsh, please call 03333 211 202 and select option 10. The office is closed Christmas Day and Boxing Day (25th and 26th December).

Calls to the 03 number are charged at a local rate when called from a landline or mobile phone.

Website

We have created a dedicated 'contact' page on our website to help you make a complaint, claim compensation for a delay, provide feedback or ask a question. Our webform provides a clear process for you to contact us in each of these instances and guides you through the relevant steps.

Our website is designed to be as accessible as possible, with no barriers for use regardless of a person's abilities or impairments. To achieve this we work with the Shaw Trust and take the needs of customers with disabilities into account whenever we update our website.

The 'contact' pages on our website and web forms are available in the medium of English and Welsh.

Letter and E-Mail

We have a freepost address for complaints and also provide compensation claim and comments forms at stations. Our compensation claim and comments forms are provided in both English and Welsh.

Customer Relations Team
Arriva Trains Wales
Freepost RLTR-HBCR-LLTH
St Mary's House
47 Penarth Road
Cardiff CF10 5DJ

Our e-mail address is: customer.relations@arrivatrainswales.co.uk

If you do want to make a complaint it will help us to reply as quickly as possible if you provide the following information:

- Your name and contact details (postal address, email, phone number)
- The details of the complaint relevant to the issue, for example;
 - Journey information (date, time, departure station and destination station)
 - Station information (date, time, station)
 - Staff (date, time, location, name and job title if known)
- Your train tickets if you are claiming compensation.

Social Media

Arriva Trains Wales operates Twitter and Facebook accounts for the following purposes:

- **Twitter - @ArrivaTW:** We operate a live Twitter service between the hours of 0700-2000 hrs Monday to Friday, 0800-2000 hrs on Saturdays and 1100-2000 hrs on Sundays.

Our Twitter service aims to keep followers up to date with key service information and assist customers with their immediate travel plans. Full details of our Twitter Policy are outlined on our website (www.arrivatrainswales.co.uk/twitterpolicy).

We do not recognise Twitter as a forum for making formal complaints, but we do monitor feedback received via this method as a way to drive continuous improvement. If you do make a complaint via Twitter, you will be directed to the 'contact' page on our website where you can make a formal complaint via a different method.

- **Facebook:** Our Facebook page is a great way for us to tell you about offers and updates. However, it is not used for live customer service interaction. If you provide us with feedback on Facebook and require a response, we ask that you contact us via one of our other contact channels.

Speaking to a Senior Manager or a Director

On occasion, we realise that some customers may wish to speak to a member of our Executive team or with a Senior Manager to discuss their complaint. To ensure we handle complaints promptly and consistently, we ask that all issues are raised with our Customer Relations team, via the methods outlined, in the first instance. Our Executive team and Senior Managers are provided with regular insight in to the reasons why customers complain to help drive continuous improvement.



Respecting equality and diversity

We are committed to adopting a flexible approach and provide a number of ways for you to contact us so that no-one is excluded from making a complaint.

Upon request we will provide copies of our complaints handling procedure, comments form or other relevant documents in alternative formats such as large print, Braille and audio.

If a customer requires someone to act on their behalf such as a carer, support worker or guardian, we will accommodate this providing the customer has given us their permission first. This includes accepting copies of power of attorney.

Our response

When you write to us by post, email or webform, we aim to respond to your complaint in the following ways:

- If an email address is provided, an acknowledgement confirming receipt of the complaint will be sent within 48 hrs (Monday to Friday).
- We aim to provide a full response within 10 working days of us receiving the complaint.
- Where a detailed investigation is required that may prevent a full response being provided within the above timescales, a holding reply will be sent within 5 working days of receiving the complaint and a full reply will be provided within 20 working days.

If you contact us by telephone

We aim to fully address your complaint over the telephone. If we cannot immediately resolve your complaint however, we aim to call you back within 3 working days. If your complaint requires investigation we will log the details of your complaint and aim to respond in the same timescales as for written correspondence shown above.

If we experience a sudden or unexpected increase in the volume of complaints, we may not be able to reply within our usual 10 working day response time. In these circumstances we will take all reasonable steps to meet our usual response timescales and will inform you of our current response time in our email acknowledgment to your complaint.



A full and fair investigation

We aim to resolve complaints at the earliest opportunity, and we investigate all issues raised in full and without bias towards anyone involved in the complaint. Our approach to handling complaints is supported by clear internal procedures, and we ensure that there is consistency in the way similar complaints are handled.

Once we have completed our investigation we will provide a full response. We will generally reply by email as you will receive a quicker response this way. However, if you have only provided us with a postal address or telephone number then we will use the contact channel provided by you to respond. If you send us your complaint via our website or comments form you'll be able to select your preferred contact method.

After we have sent our full reply we will consider the complaint closed. However, if you remain dissatisfied and we need to send a second reply we will:

- Review the reason for your reply and carry out any further necessary investigations
- Escalate the complaint to a more senior member of the team (if appropriate)
- Respond to you addressing the reason you have contacted us again, including the details for Transport Focus.
 - Transport Focus is the independent transport user watchdog, who work with train companies to resolve complaints.

When reviewing the reasons if you remain dissatisfied we will:

- Investigate whether we have failed to fully or adequately address the original complaint in our first reply
- Review whether our investigation process is appropriate
- Review whether our reply was clear and easy to understand

Replies provided by our Customer Relations team will be in plain English and free from railway jargon, initials or acronyms. The team are trained to provide professional and courteous responses and have flexibility in style and tone to meet each customer's individual needs.

If you wish to seek further advice or remain unsatisfied with the reply you receive from us you can contact Transport Focus, the independent transport user watchdog, using the details below:

Transport Focus
www.transportfocus.org.uk

Email: advice@transportfocus.org.uk

Tel: 0300 123 2350

Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ
PO Box 5594
Southend On Sea
SS1 9PZ

Compensation for delays

We will provide you compensation as a matter of routine as outlined in our Passenger's Charter if you experience a delay on one of our trains and contact us to let us know.

Our Customer Relations team have discretion to exceed the compensation thresholds depending on the particular circumstances of the complaint.

If you also express dissatisfaction about any aspect of the service we have provided to you when making a claim for compensation for a delayed journey, we will categorise this as a complaint. If you contact us to complain about a disrupted journey but you do not specifically request compensation then we will highlight your compensation rights to you and pay any compensation you may be owed. Compensation requests for poor service that are not covered by our Passenger's Charter will be considered on an individual case basis dependent upon the circumstances of each individual complaint. Compensation will be provided in one of these formats: National Rail travel vouchers, Cheque, Bank Transfer (BACS), Credit/Debit card and Cash voucher at the customer's request. This payment is made in line with our Passenger's Charter entitlement shown below:

Length of Delay	Compensation Single Ticket	Compensation Return Ticket
30 to 59 minutes	50% of the cost of your ticket	25% of the cost of your ticket
1 hour or more	100% of the cost of your ticket	50% of the cost of your ticket
2 hours or more	We may increase the level of compensation	

If you hold a season ticket we will compensate you for any individual delayed journeys on Arriva Trains Wales services. The value of each individual journey will be based on the following table and the compensation levels applying to single tickets will be used.

Season Ticket Type	Value of each journey
Annual	Cost of Ticket divided by 464
Monthly	Cost of Ticket divided by 40
Weekly	Cost of Ticket divided by 10

If your journey was delayed for less than 30 minutes and it was directly the fault of Arriva Trains Wales we will consider reasonable compensation in line with your legal rights under the Consumer Rights Act 2015.

Once we have investigated your claim and identified the cause of your delay we will pay you any compensation you are entitled to within 14 days of agreement. If we do offer you compensation in addition to your rights under the National Rail Conditions of Travel and the Consumer Rights Act 2015 we will usually provide this in the form of National Rail travel vouchers.

Escalation of complaints

Some complaints require immediate escalation for a first response when the content of the complaint contains:

- Details of personal injury or allegations of a safety breach
- Allegations of serious or illegal misconduct
- Matters relating to accessibility or disabled assistance
- Where there is a serious risk to the reputation of the company
- Matter relating to our Revenue Protection Policy and prosecution

In the above circumstances, your complaint will be dealt with by a senior member of the Customer Relations team.

All staff are trained to assess and act accordingly when a complaint needs to be escalated within the organisation.

Respecting your confidentiality

When you contact us to make a complaint we will keep your personal information confidential and secure. All correspondence is scanned or copied to our Customer Relations Management system and retained electronically for a period of up to 6 years. Original written correspondence will be stored securely for up to 6 months at which point it will be shredded and destroyed.

We will not disclose any personal information to any third parties if we do not have your consent, and we will then only divulge your details where it is necessary for us to fulfil our own obligations or to bodies carrying out a statutory duty (unless it is necessary for us to fulfil our own legal obligations or prevent fraudulent activity, for example sharing information with our claims handlers or the Police).

If a complaint or claim refers to another Train Operating Company or a 3rd party, this will be acknowledged and passed on to that company within our published response times. We will advise you of this action and provide you with the relevant company's contact details. However, we will only do this once we have received permission from you to share your details. Clear and informed consent will be obtained at the time you submit your complaint via our web form or comments form. If we do not have your consent at the time of contact we will contact you to obtain it before taking further action.

Personal details of customers obtained from complaints correspondence will never be used for marketing purposes or provided to 3rd parties for commercial purposes. We carry out complaints handling satisfaction research in conjunction with the Office of Rail and Road. If you do not want to take part in this survey we will provide you with an email link to opt out of this survey embedded in your reply from us. We treat our obligations under the Data Protection Act very seriously. Our privacy policy is published on our website (www.arrivatrainswales.co.uk/PrivacyPolicy/) and a printed copy can be requested from the Customer Relations team.



Complaints handling procedure

August 2016

Introduction

Providing an excellent customer experience is central to the Arriva Trains Wales vision.

We recognise that sometimes things may go wrong and we want to ensure our customers can easily let us know when they are not satisfied with the service we have provided.

The opinions of our customers are central to ensuring that we deliver the service they require. We have therefore designed an easily accessible complaints process to help our customers give us their feedback and tell us what they expect. Our complaints handling procedure outlines the following:

- How to make a complaint.
- How we will investigate the complaint.
- When the customer can expect a reply to their complaint
- How the customer can escalate their complaint if they are unhappy
- What we do with the complaint data.
- How we use customer complaints to drive continuous improvements.
- How we ensure a quality complaints handling service is delivered to our customers.

We define a complaint for the purpose of our Complaints Handling Procedure as “***any expression of dissatisfaction by a customer or potential customer about service delivery or company or industry policy***”.

Whilst all expressions of dissatisfaction are deserving of a response, for the purposes of clarity we distinguish between a complaint and feedback based on what is covered within the scope of this procedure. We monitor feedback as it provides valuable insights into our performance, can adversely affect our reputation, and may influence future service and delivery methods.

Feedback can be positive, negative or neutral about the service we provide but may not necessarily require corrective action, a change to our services or formal review of a decision. We will gather and monitor feedback via social media and online forums, the results of post travel customer surveys and by listening to what our staff and customers tell us. If we feel that feedback could be characterised as a complaint we will direct customers to use our formal complaints procedure, and also endeavour to provide responses to all items of feedback received.

Our complaints handling procedure is available on our website (www.arrivatrainswales.co.uk), at staffed stations that we manage, or by contacting our Customer Relations team who will send a copy upon request. A copy of this document will also be made available on the website of the Office of Rail and Road (www.orr.gov.uk)

We will review the procedure every twelve months as a minimum. When doing so, we will consider any suggestions for improvement made by customers and other stakeholders.

When proposing changes to the procedure, we will obtain the approval of the Office of Rail and Road and also consult with Transport Focus.

Core Standard 1 - Feedback mechanisms and response

1. Promoting awareness

We will ensure that information on how to make a complaint is available via the following sources:

At stations

Posters outlining how to contact us to make a comment, complaint, suggestion or claim compensation for a delayed journey will be displayed at all of the stations that our services stop at, even if we are not responsible for managing that station. In addition, we will display contact details for other train operators who stop at stations that we manage.

Comments forms will be available from staff at staffed stations that we manage or serve so that customers can easily make a complaint, comment or make a suggestion.

At unstaffed stations posters will outline the various ways customers can make a complaint.

On trains

There will be a poster in every carriage of every train advising customers how they can contact us.

Our conductors carry comments forms and compensation information cards which outline how to make a claim. These can be distributed to passengers upon request.

Printed literature

Our contact details are shown in our pocket timetables, our Passenger's Charter and our guide on assistance "Making Rail Accessible: Helping Older and Disabled Passengers".

Website

Details of how to make a complaint are available within 2 clicks of our homepage by clicking on "Contact" (www.arrivatrainswales.co.uk)

Social Media

Details of how to make a complaint if a customer contacts us via social media are outlined in our Twitter Policy (www.arrivatrainswales.co.uk/twitterpolicy/) and on our Facebook page.

All of our publicity outlining how to complain also provides contact information for Transport Focus.

2. Easily accessible to all

We want to make it as easy as possible for customers to make a complaint using their preferred contact method, and the one they are most comfortable using. To assist customers there are a number of ways to contact us:

In person at a station

We always encourage our customer facing staff to try and resolve problems immediately wherever possible. If they are unable to do so, staff will provide customers with the contact details for the Customer Relations team so that the complaint can be progressed using our complaints handling procedure.

Contacting our Customer Relations team

We employ a team of dedicated Customer Relations staff specifically for the purposes of receiving, investigating and responding to comments, complaints and suggestions. We will take reasonable steps to ensure that customers with specific needs are catered for when contacting us. For example, we will use the services of a translator to ensure that customers whose first language is not English can correspond with us easily. A Textphone service is also available via our Assisted Travel team between 0800 and 2000 seven days a week at 0845 758 5469.

If a customer wants to make a complaint they can contact the Customer Relations team by:

✳ **Telephone:** 03333 211202

The team is available from 0800 until 2000hrs Mondays to Saturdays, and from 1100 until 2000hrs Sundays. The call centre is able to communicate via the English or Welsh language. The office is closed Christmas Day and Boxing Day.

Calls to the 03 number are charged at a local rate when called from a landline or mobile phone.

✳ **Website:**

We have created a dedicated 'contact' page on our website to help customers make a complaint, claim compensation for a delay, provide feedback or ask a question. Our web form provides a clear process for customer's to contact us in relation to each of these reasons.

Customers can make a complaint within 2 clicks of our homepage, and this page provides clear information on how to make a complaint, with links to frequently asked questions. A web form to send the complaint is provided in addition to information about the alternative ways a complaint can be made.

Our website is designed to be as inclusive as possible, with no barriers for use regardless of a person's abilities. To achieve this we work with the Shaw Trust and take the needs of customers with disabilities into account whenever we update our website or create new content.

The Contact Us pages on our website and web forms are available in the medium of English and Welsh.

✳ **Letter:**

We have a freepost address for complaints and also provide comments forms at stations.

Customer Relations Team
Arriva Trains Wales
Freepost RLTR-HBCR-LLTH
St Mary's House
47 Penarth Road
Cardiff
CF10 5DJ

Our comments form is provided in both English and Welsh.

✳ **Email**

Customer.relations@arrivatrainswales.co.uk

If a customer sends us a letter or an email it will help us address their complaint as quickly as possible if they are able to provide the following information:

- Their name and contact details (postal address, email, phone number)
- Details of the complaint relevant to the issue, for example;
 - Journey information (date, time, departure station and destination station)
 - Station information (date, time, station)
 - Staff (date, time, location, name and job title if known)
- Train tickets if they are claiming compensation.

We will give our reply in the language the customer chooses to contact us in.

Social Media

Arriva Trains Wales operates Facebook and Twitter accounts for the following purposes:

- * **Facebook:** Our Facebook page is a great way for us to tell customers about offers and updates. However, if a customer provides us with feedback requiring a response, we ask that they contact us via one of our other contact channels.
- * **Twitter - @ArrivaTW:** We operate a live twitter service between the hours of 0800 – 2000 hrs Monday to Saturday and 1100-2000 hrs on Sundays.

Our twitter service aims to keep followers up to date with key service information and assist customers with their immediate travel plans. Full details of our twitter policy are outlined on our website (www.arrivatrainswales.co.uk/twitterpolicy).

We do not recognise social media as a forum for making formal complaints, but we do monitor feedback received via social media as a way to drive continuous improvement. Customers who make a complaint via social media will be directed to the contact us page on our website if they wish to make a formal complaint.

Contacting us via online intermediaries

If a customer sends a complaint to us via an online intermediary such as Resolver or Fix My Transport our Customer Relations team will deal with the complaint in the same way as complaints sent directly to us via our own website.

Speaking to a Senior Manager or a Director

On occasion, we realise that customers may wish to speak to a member of our Executive team or with a Senior Manager. To ensure we handle complaints consistently, we ask that all issues are raised with our Customer Relations team as we have a clear escalation process in place as outlined in section 9.

3. Respecting equality and diversity

We are committed to adopting a flexible approach to the ways customers contact us so that no one is excluded from making a complaint. We provide a range of ways for customers to contact us as outlined in section 2.

Upon request we will provide copies of our complaints handling procedure, comments form or other relevant documents in alternative formats such as large print, Braille and audio.

If a customer requires someone to act on their behalf such as a carer, support worker or guardian, we will accommodate this providing the customer has given us their permission first. This includes accepting copies of power of attorney.

4. Respecting complainant confidentiality

If a customer contacts us to make a complaint we will keep their personal information confidential and secure. All customer correspondence will be scanned or copied to our Customer Relations Management system and retained electronically for a period of up to 6 years. Original written

correspondence will be stored securely for up to 6 months at which point it will be shredded and destroyed.

We will not disclose any personal information to any third parties if we do not have the customer's consent, and we will then only divulge your details where it is necessary for us to fulfil our own obligations or to bodies carrying out a statutory duty (unless it is necessary for us to fulfil our own legal obligations or prevent fraudulent activity, for example sharing information with our claims handlers or the Police).

If a complaint or claim refers to another Train Operating Company or a 3rd party, this will be acknowledged and passed on to that company within our published response times. We will then advise the customer of this action and provide them with the relevant company's contact details. However, we will only do this once we have received permission from the customer to share their details. Clear and informed consent will be obtained at the time the customer submits their complaint via our web form or comments form. If we do not have their consent at the time of contact we will contact the customer to obtain this consent before taking further action.

Personal details of customers obtained from complaints correspondence will never be used for marketing purposes or provided to 3rd parties for commercial purposes.

We carry out complaints handling satisfaction research in conjunction with the Office of Rail and Road. If customers do not want to take part in this survey we will provide them with an email link to opt out of this survey.

We treat our obligations under the Data Protection Act seriously. Our privacy policy is published on our website (www.arrivatrainswales.co.uk/PrivacyPolicy/) and a printed copy can be requested from the Customer Relations team.

5. Response times

We aim to respond to customer complaints within the following timescales;

- An acknowledgement confirming receipt of the complaint will be sent within 48 hrs (Monday to Friday) if an email address is provided.
- A full response will be provided within 10 working days of receiving the complaint.
- Where detailed investigation is required that may prevent a full response being provided within the above timescales, a holding reply will be sent within 5 working days of receiving the complaint and a full reply within 20 working days.
- At least 90% of all e-mail and written correspondence will be responded to within 10 working days, and at least 95% within 20 working days.
- A minimum of 80% of all incoming calls will be answered within 30 seconds.

If we cannot immediately resolve your complaint over the phone, we aim to call you back within 3 working days. If your complaint requires investigation we will log the details of your complaint in our Customer Relations Management System and aim to respond in the same timescales as for written correspondence shown above.

If we experience a sudden or unexpected increase in the volume of complaints, we may not be able to meet our 10 working day response time. Circumstances where this may arise are train service disruption caused by exceptional weather or other factors outside of the rail industry's control, force majeure events or industrial action.

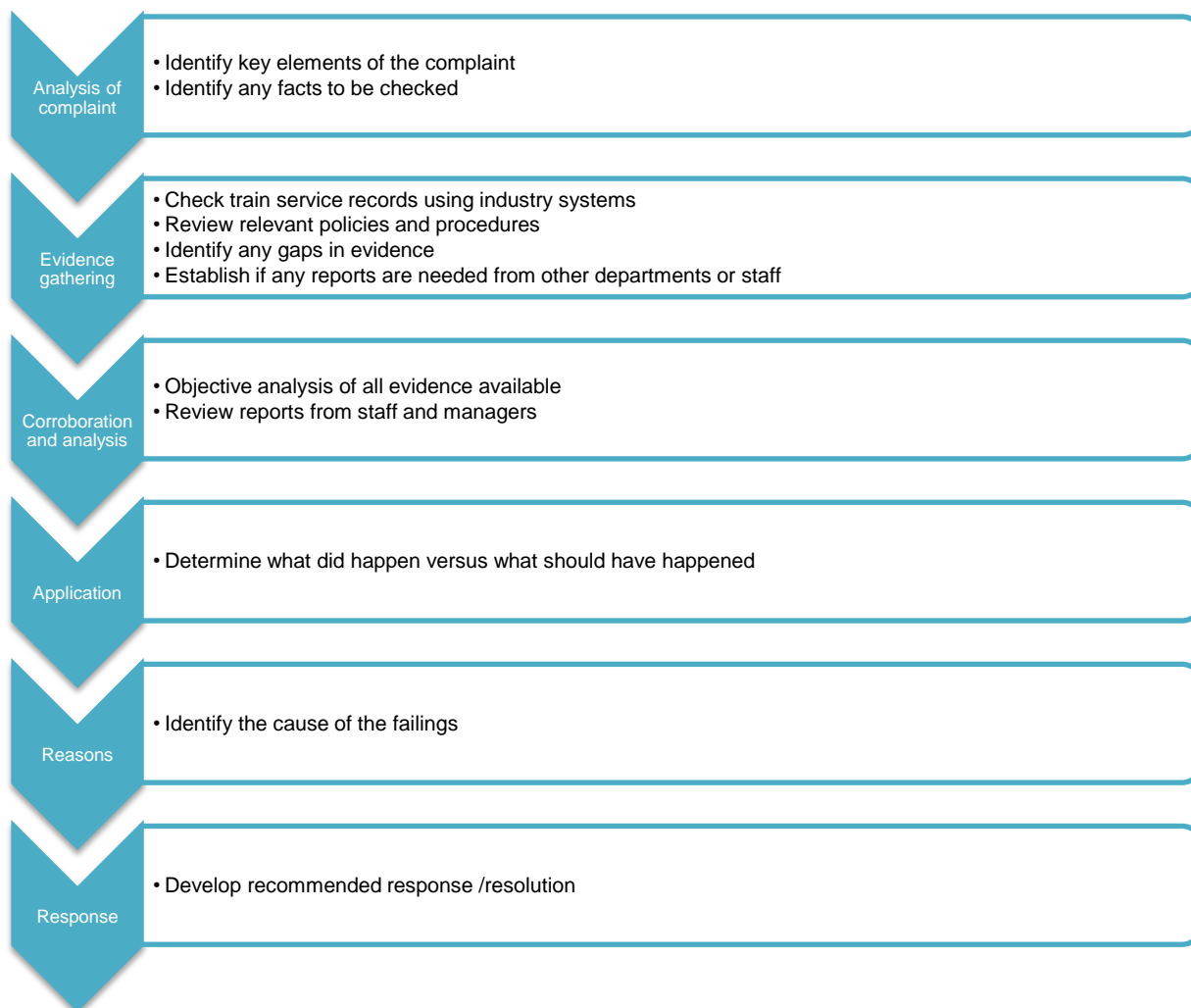
In these circumstances we will take all reasonable steps to meet our usual response timescales and will inform our customers of our current response time in our email acknowledgment to their complaint.

We will inform the Office of Rail and Road and Transport Focus when such circumstances occur, including the reason, expected duration, plans to remedy the situation, procedures to ensure the quality of response is maintained and steps to keep customers informed.

6. A full and fair investigation

We will aim to resolve complaints at the earliest opportunity, and we will investigate all issues raised in full and without bias towards anyone involved in the complaint. Our approach to handling complaints will be supported by clear internal procedures, and we will ensure that there is consistency in the way similar complaints are handled.

When investigating a complaint we will ensure this is proportionate to the issues raised and will follow ORR's six step process:



Once we have completed our investigation we will provide a full response. We will generally reply by email as customers will receive a quicker response this way. However, if the customer has only provided us with a postal address or telephone number then we will use the contact channel provided by the customer to respond. If a customer sends their complaint via our web form we will ask them what their preferred contact method is.

After we have sent our full reply we will consider the complaint closed. However, if the customer replies again and we need to send a second substantive reply we will:

- Review the reason the customer has replied
- Carry out any further necessary investigations
- Escalate the complaint to a more senior member of the team if appropriate
- Respond to the complainant addressing the reason they contacted us again, including the details for Transport Focus and Alternative Dispute Resolution (ADR).

Transport Focus is the independent transport user watchdog, who work with train companies to resolve complaints.

In reviewing the reason why a customer has replied again we will consider:

- Whether we have failed to fully or adequately address their original complaint in our first reply
- Whether our investigation process is appropriate
- Whether our reply was clear and easy to understand

Replies provided by our Customer Relations team will be in plain English and free from railway jargon, initials or acronyms. We train our team to provide professional and courteous responses and encourage flexibility in style and tone to meet each customer's individual needs.

7. Frivolous or vexatious complaints

We will always do our best to bring customer complaints to a full conclusion, however there may be occasions where we decide that we need to terminate contact with a customer regarding a particular complaint or decide that we will not respond to the specific points raised in the initial complaint.

If a member of the Customer Relations team believes that a complaint is frivolous or vexatious they will highlight it to the Head of Customer Experience or Customer Relations Manager who will decide the outcome. The decision to categorise a complaint as frivolous or vexatious will only be taken by the Head of Customer Experience or Customer Relations Manager. The decision will be recorded in our Customer Relations Management system and relayed to the customer by the Head of Customer Experience or Customer Relations Manager with the contact details for Transport Focus and ADR.

8. Compensation

We will provide compensation as a matter of routine as outlined in our Passenger's Charter, when customers contact us about train delays. Our Customer Relations team also have discretion to exceed the compensation thresholds depending on the particular circumstances of the complaint.

If a customer expresses dissatisfaction when making a claim for compensation for a delayed journey then we will categorise this as a complaint. If a customer contacts us to complain about a disrupted journey but does not specifically request compensation then we will highlight their compensation rights to them and pay any compensation they may be entitled to.

Compensation for poor service that is not covered by our Passenger's Charter will be considered on an individual case basis dependent upon the circumstances of each individual complaint.

Compensation will be provided in one of these formats; national rail travel vouchers, Cheque, bank transfer (BACS), Credit/Debit card and cash voucher at the customer's request.

9. Escalation of complaints

There are a number of reasons why a complaint may be escalated within the Customer Relations function and the team is trained to recognise these variations and act accordingly.

If a customer complaint has been handled in the first instance by a Customer Relations Advisor it will be escalated to a Customer Relations Team Leader in the following instances:

- Customer requests their complaint is escalated.
- Customer is particularly unhappy with the response they have received and further response from the same Advisor may exacerbate the situation.
- Customer is requesting the outcome of their complaint is revised and the original case handler is unable to meet this request or believes that the original outcome is reasonable.

Complaints will immediately be escalated to a Customer Relations Team Leader for a first response when the content of the complaint contains:

- Details of personal injury or allegations of a safety breach.
- Allegations of serious or illegal misconduct.
- Matters relating to accessibility or disabled assistance.
- Where there is a serious risk to the reputation of the company.
- Matter relating to our Revenue Protection Policy and prosecution.

In circumstances where a customer is unhappy with the response provided by a Customer Relations Team Leader in relation to the above further escalation of the complaint will apply in the following order:

- Different Customer Relations Team Leader for review.
- Customer Relations Manager.
- Head of Customer Experience.
- Customer Services Director.

All further responses to a complaint will be in line with those outlined in section 5.

All substantive replies after our first full response will contain the details of Transport Focus and ADR should the customer wish to escalate their complaint outside of our own escalation process and appeal our decision.

10. Appeals to Transport Focus

If a customer raises an appeal with Transport Focus we commit to the following:

- Provide Transport Focus with at least 2 named contacts.
- As far as practicable ensure the appeal is reviewed by a senior member of the team who has not handled the case already.
- Confirm receipt of the appeal within 2 working days and the named contact who will review the complaint.
- Provide any supporting case documents within 5 working days.
- Provide a full response to the appeal within 10 working days and advise if the matter is particularly complex that it may take us up to 20 working days.
- Work with Transport Focus to agree an alternative arrangement in exceptional circumstances where we cannot comply with the above.
- Here are the contact details for Transport Focus:

Transport Focus
www.transportfocus.org.uk

Email: advice@transportfocus.org.uk
Tel: 0300 123 2350
Twitter: @TransportFocus

Freepost RTEH-XAGE-BYKZ
PO Box 5594
Southend On Sea
SS1 9PZ

11. Interface with Claims Handling Procedures

If a customer wishes to lodge a claim for losses, property damage, or personal injury this should be addressed in writing to our Customer Relations team. We will ensure that the claim is passed to our nominated Claims Handler and then advise the claimant of who is dealing with the claim.

Any claims received will be dealt with in accordance with the UK rail industry's Claims Allocation and Handling Agreement.

Core standard 2 – Structure, people and processes

We aim to ensure that:

- All quality and service standards are measured and monitored to enable a continuous improvement cycle to be imbedded within the organisation.
- Customer facing staff are supported and have regular contact with their line manager to receive feedback on their performance (via our Competency Management System).
- We have clear written procedures which all staff have access to detailing what to do in varying scenarios.
- We have well trained and well informed staff at stations and on trains to enhance and support the customer experience.
- The Executive and Senior Leadership team have a full and detailed periodic overview of complaint volumes and reasons.

Organisational structure and people

All complaints received via web form, email, telephone, comments form and post will be handled by the Arriva Trains Wales Customer Relations team. The team will handle all complaints in accordance with the CHP detailed in Core standard 1.

Escalation points of contact for queries and support exist in the form of Senior Customer Relations Advisors and a Customer Relations Manager who report to the Head of Customer Experience, who is ultimately responsible for achieving set standards.

Training and Development

Customer Service training for customer facing staff takes place during induction and is then supported by coaching and feedback from the line manager with a supplementary annual training day which focuses on relevant topical updates.

Customer Relations Advisors (CRA's), who manage all formal complaints, receive enhanced customer service training. This includes how to manage a complaint made by telephone, how to investigate a complaint using the appropriate systems and guidance documents and how to structure a reply. Staff are encouraged to discuss complaints with each other and agree what the appropriate resolution is based on the customer's individual experience.

Training and customer focus is underpinned and supported by a 4-weekly periodic one-2-one and Personal Development Record (PDR).

The one-2-one process includes feedback on a random sample of cases that have been quality checked by the Senior Customer Relations Advisor to ensure replies to customer complaints meet our complaint handling criteria that focus on:

- Structure and tone
- Investigation and referral
- Factually correct information
- Compensation and redress
- Data capture

This allows us to highlight good practice and identify any training gaps to ensure the right knowledge is transferred and shared within the team, ultimately helping us to facilitate a consistent, high quality complaint handling process.

The PDR focuses on the longer term development of individuals, challenging them to stretch their learning and development. Depending on the experience of the individual this can take various forms, which may include but is not restricted to; spending time with other functions, mentoring other team members and taking on additional responsibilities in preparation for succession planning. Re-training is provided as needed and is supported by this process.

Recruitment for these positions focuses on an individual's ability to provide a high quality written response, coupled with a passion for providing exceptional customer service. Previous experience in a customer service environment is also considered essential. We recruit people with the right attitude that want to make a difference and provide training to ensure they are competently able to address a customer's complaint.

Processes and Protocols

Record keeping

All written contact from customers to our Customer Relations team will be recorded in our Customer Relations Management system. Personal data is retained securely and confidentially. Customer correspondence received by post will be scanned to CRM system when it is received and retained electronically for a period of up to 6 years. The original written correspondence will be securely stored and destroyed within 6 months. Emails and web forms received from customers will be stored in our CRM for the same period of time as written correspondence.

Telephone calls recorded by our Customer Relations call centre will be retained for a period of up to 6 months to support staff training and accurate complaint handling.

We will retain personal contact information about customers for the duration of our Franchise in order to manage repeat contact. This information will be updated or amended if a customer advises us that any of their personal contact details have changed. If a customer contacts us to make a complaint we will keep their personal information confidential and secure.

All complaints are logged and recorded in order for us to review and use the data internally, and to support continuous learning and the ability to clearly see where improvements are needed. The reasons for complaints are also shared externally with our Franchise Authority and the Office of Rail and Road in order to comply with the core data requirements of our licence condition.

Quality assurance framework/quality controls

All CRAs have their work regularly checked to ensure quality is maintained. During the probation period for new team members this is set at 100% and then reduced accordingly during their training period. All Advisors will have 5 cases quality checked at random each month and the outputs will be discussed at their one-2-one. Any complaints that result in escalation due to customer dissatisfaction are also discussed with the individual in order to identify potential areas for improvement. If there are any concerns with the quality of response provided by an Advisor at any time, the Senior CRA will implement a training plan to address those issues, and if necessary increase the volume of cases that are quality checked until they are satisfied that required standards are being met.

The Customer Relations Manager and Head of Customer Experience will spot check 5 responses per month that have been quality checked to ensure the above process is being carried out consistently and the quality criteria is still fit for purpose.

The identification of systemic weaknesses

All customer complaints that are received in the Customer Relations team in writing, telephone or via web forms are recorded and used as a source of intelligence to inform the business of issues causing customer dissatisfaction. They are tracked each period and reviewed against the last rolling 13 months for trend analysis. The Head of Customer Experience sends a 4 weekly periodic 'Voice of Customer' report to the Executive team and all other Heads of Function. This report highlights where standards have not been consistently met, prompting the responsible person/s to review their approach to the situation. This is followed up with a discussion either at a Senior Managers meeting or a one-2-one conversation to ensure action is taken.

All staff complaints and praise are passed on to the relevant management to fully review the details of the situation and take remedial action as required.

If a customer reports an accident to the Customer Relations department the details are passed to our Safety department to ensure they are recorded in RIDDOR and the relevant accident forms completed.

Complaint handling service standard

We will assure ourselves that our complaints handling process is robust and meetings its aims by:

- Ensuring our complaints handling procedures are subject to high level governance that includes director oversight
- The complaints handling process is easily accessible and easy to use
- Complaints handling staff are well trained and professional
- Complaints will be fully and fairly investigated
- Complaints will answered in full within 20 working days or sooner where possible
- Complainants will be kept informed of the progress of their complaint
- Complaints will be resolved to the satisfaction of the complainant and the organisation will address systematic issues and learn from them
- Complainants will be advised of their right to representation and signposted to Transport Focus

We will be transparent about achieving these aims by:

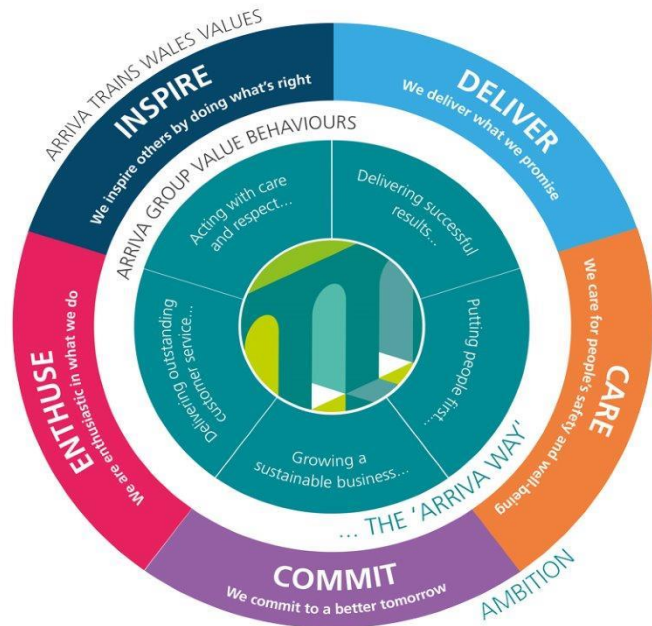
- Reporting to ORR every 4 weeks the volume of complaints we receive, the reasons for the complaints and our response times, including any dissatisfaction with the way a complaint has been handled.
- Allowing customers access to information about the volume of appeals raised with Transport Focus and the outcomes via the data portal on their website.
- Publishing our high level performance metrics on our website, outlining our response times and complaint volumes.

Core standard 3 – Organisational culture

This core standard sets out the means by which complaints data is used to address the root cause of a complaint and shape the priority of when service improvements are evaluated and delivered.

Organisational ownership and commitment

All complaints that we receive are a valued form of feedback about how our business could better meet customer expectations. Each period, the Head of Customer Experience compiles information relating to complaint volumes and reasons into a 'Voice of Customer' report that is then reviewed by the Executive and Senior Leadership teams to identify repeat trends and emerging issues in order to work through ways of improving them. This is followed up by monthly/quarterly attendance at functional team meetings to discuss current complaint volume specific for that business area and agree ways forward. The volumes and reasons for complaints are also discussed during the Customer Experience strategic meeting each 4 weekly period and are used as a Key Performance Indicator to evaluate current business performance.



An overview of customer complaint data and key projects derived from this information is available on our website.

The National Rail Passenger Survey (NRPS) is also a key report from which change is instigated. The results are reviewed thoroughly after each publication to gather and collate areas that may need improvement or focus.

Our station mystery shopping programme provides us with an inside look into the customer experience and provides a way to gauge customer satisfaction with the station environment, customer service and ticket retailing. This is extremely important when trying to find ways to innovate and grow our company's customer base and improve satisfaction levels. We use the reports that mystery shoppers submit to obtain important information about our business and to give us a better idea of where and how to improve.

Our reformed Customer Panels are vital in giving us an open line of communication with our customers. They are representative of our customer base and cover every part of our network. Our quarterly meetings help shape and prioritise future projects, whilst also highlighting the thoughts and concerns of passengers that travel with us regularly. Our Customer Panels also conduct mystery shopping on-board our trains each month. This data is extremely valuable in helping assess the interaction of employees with our customers as well as the on-train environment and is used alongside the station mystery shopping programme. Monthly results are discussed at the Customer Experience strategic meeting with all the key post holders involved with introducing improvements where needed.

Continuous learning and improvement is also supported by external sources such as;

- Arriva UK Customer Improvement Networks where all Arriva TOCs share their thoughts on our collective goals, with the aim of driving best practice and strategic advancement
- ORR: They can continue to improve the Complaint Handling Procedure utilising means such as the periodic complaint handling satisfaction survey results

Arriva Trains Wales and Arriva group values support and help shape employee behaviour in relation to improving customer interaction and complaint handling.

These values underpin our ambition which is 'passionate, proud people, delivering excellent service, every time.'

The Customer Experience strategy details customer information and complaint handling as a key component of the success of the strategy. Listening to customers and the use of complaint themes, trends and volumes is paramount in improving the quality of the service offered.



Our Purpose: Connecting people and communities to what is important to them