



OFFICE OF RAIL REGULATION

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Dear Colleagues

Developing minimum core data for monitoring operators' CHP and DPPP performance

We are today publishing two statements that explain our approach to the approval and monitoring of train and station operators' Complaint Handling Procedures (CHP) and Disabled People's Protection Policies (DPPP).¹ An important way in which we plan to monitor operators' performance is through establishing a 'core data' set. This data will be published. This will improve the transparency of passengers' experience. It will also strengthen reputational incentives, allowing operators' progress over time to be tracked, but would not report against any specific or minimum targets.

We want the core data to focus on two issues:

- the quality of the experience delivered to passengers; and
- basic measures of the amount or volume of activity in dealing with complaints or meeting obligations in operators' DPPP's.

In developing this core data, we would very much value views from a wide range of stakeholders, including passenger or disability representative groups, along with train and station operators. Where possible, we welcome practical suggestions or experiences to help meet the challenge of establishing a core data set.

Consultation questions

We invite views on the five questions below. **We ask for views on these issues by 29 August.** Wherever possible, please provide clear examples and supporting evidence.

¹ Our regulatory statements can be found on our [website](http://www.rail-reg.gov.uk).



INVESTOR IN PEOPLE

Question 1	Do you agree with ORR collating information produced by operators and publishing this as a minimum core set of data in respect of CHP and DPPP outcomes? Please provide the reasons for your views.
Question 2	Do you agree with our guiding principles to develop the core data set (see annex 1)? Please explain the reasons for your views.
Question 3	<p>Do you agree with our proposal to establish a working group to support ORR in developing a final core data set (see annex 1)? Please explain the reasons for your views.</p> <p>Annex 1 outlines the working group in more detail.</p> <p>We ask that you register your interest in being part of the working group by 1 August, using the contact details below.</p>
Question 4	<p>The following questions draw on the data examples in annex 2.</p> <p>(a) What are the strengths and weaknesses of the example measures and data proposed in annex 2? Where weaknesses are identified, please propose any solutions to this or alternative but equivalent measures.</p> <p>(b) For each example measure, we ask train or station operators to state whether they i) already collect this (or very similar) information, and if so ii) briefly describe how the measure is defined and method of collection. This will allow us to understand the extent to which operators follow similar practices or collect similar data.</p> <p>(c) Operators may also have preliminary views on any <i>additional</i> costs associated with the example measures. In this case, please provide that estimate together with an explanation as to why the additional cost is expected to arise, along with the method of cost estimation.</p>
Question 5	Please propose any alternative or additional measures that should be considered, either to assess the quality of experience delivered to passengers or to monitor the amount or volume of activity? Please explain how your alternative measures would work and the reasons for proposing them.



How to submit your response

We will publish responses on our website and potentially quote from them. Where all or part of your response is confidential, please provide a non-confidential statement of your main points that can be published.

If possible please provide electronic response to john.holmes@orr.gsi.gov.uk.

So that we are able to apply web standards to content on our website, we would prefer that you email us your response in Microsoft Word format. If you do send us a PDF document, please:

- create it from the electronic Word file (preferably using Adobe Acrobat), as opposed to an image scan, where possible; and
- ensure that the PDF's security method is set to 'no security' in the document properties.

Alternatively, hard copy responses may be sent to:

Mr John D Holmes
Office of Rail Regulation
One Kemble Street
London
WC2B 4AN

Next steps

We expect to put in place the working group in August 2014, aiming to enable consultation on a final set of minimum core data for consultation in December 2014. We envisage that operators would begin collecting a set of core data from April 2015, reporting periodically after this date. If you have any questions, please contact John Holmes (john.holmes@orr.gsi.gov.uk, Tel: 020 7282 3739) in the first instance.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Annette Egginton', with a stylized flourish at the end.

Annette Egginton

Annex 1 – Background and working group proposals

ORR's regulatory statements and the role of the core data set

We have published regulatory statements explaining how we will approve, monitor and enforce the CHP and DPPP licence conditions of train and station operators.² The requirements and functions under these licence conditions serve very different needs. Nevertheless, the statements make clear that we will draw on a range of evidence to assess operators' performance, including:

- the core data developed following this consultation, which would include the data collected from operators now and published through the ORR Data Portal;³
- feedback from relevant representative groups, including Passenger Focus and London TravelWatch amongst others;
- occasional bespoke qualitative or quantitative research produced by ORR or others, for example the mystery shopping research into disabled passengers use of railways published in March 2014;⁴ and
- from time to time drawing on the information that operators collect as part of their ongoing monitoring and evaluation of their own performance.

We will periodically report our findings from this range of data, offering an opportunity to review good practice and identify key trends or changes in performance.

There are a number of benefits to producing consistent and regular data, including:

- enabling consistent measurement of changes in individual operators' performance over time;
- identifying events or issues that have a material effect on performance, enabling remedial action; and
- strengthening reputational incentives to encourage continuous improvement.

² These can be found on our [website](#).

³ ORR's Data Portal can be found at <http://dataportal.orr.gov.uk/>

⁴ 'Passenger Assist Journey 2013', Passenger Focus, 13 March 2014
(<http://www.passengerfocus.org.uk/research/publications/passenger-assist-journeys-2013>)

Guiding principles for developing core data

We recognise that producing additional data can impose a cost on participants. We have therefore adopted the following principles to guide the selection of relevant data:

- **Relevant and manageable:** The measure must be relevant to delivering a good and improving experience for passengers in respect of CHP and DPPP and draw on the most relevant or critical outcomes or activities to support this;
- **Quantifiable and comparable:** The methods of measurement should be consistent and allow reasonable comparison (in particular of the performance of an individual operator over time); and
- **Actionable:** Data that focus on outcomes or outputs which operators, or perhaps other relevant parties, can understand and act on.

As a result, wherever possible and ensuring the measures are effective to meet our needs, we favour:

- Using existing measures and not undoing measures already collected. Many operators already collect a range of data, either directly for their own benefit or due to a franchise obligation. If appropriate, we would prefer to rely on existing measures that are more readily available, or that could be adopted across operators.
- Keeping focused on passenger or business needs. We do not want data solely targeted at ORR or that otherwise encourages operators to focus more on ORR than their passengers. We are, therefore, looking to stakeholders to help ORR ensure data is meaningful to operators and the wider public.
- Agreement. Where possible we aim to achieve a common approach on the form and frequency of data to be collected and published. This may not be possible in all cases, in which case we will judge the benefits of a proposal accounting for the interests of passengers and other stakeholders.
- Contextual information where practicable. Additional context around data can aid interpretation of the results. However, this should not be an attempt to 'explain away' poor outcomes or performance.
- Publishing results. The data on performance of the rail industry is important to passengers, representative groups and the public more widely (as significant funders of the rail industry). We would publish the data we collect, reflecting the context of information (noted above) and where relevant recognising good practice amongst operators.

Working groups

There are a number of practical challenges when developing common measurement definitions or methodologies, in particular when dealing with operators with different services, franchise commitments and business models. In addition to consultation, and being open to hearing individual views or suggestions, we propose a small working group to consider specific options and develop practicable options. The conclusions from this group would directly inform ORR's final proposals.

We envisage this process comprising one or two small groups, balanced between train operators, passenger representatives, disabled passenger representatives and also drawing on the experience of third parties such as other regulators or academics. The membership would be selected by ORR from those that express an interest, based on participants' relevant expertise and to ensure a fair balance in the parties, and posted on ORR's website.

The group would consider the purpose and relevance of measures, definitions, method and frequency of data collection and reporting. The initial measures to be considered by the groups would be proposed by ORR and developed from the example data below (annex 2) and the results of this consultation.

We will post updates to ORR's website and welcome suggestions of how to make this a more open and collaborative process.

Annex 2 – Example data for comment

The following sections propose some example measures or data to prompt discussion or comment. We welcome specific feedback on the strengths and weaknesses of the individual measures proposed, along with practical suggestions to address weaknesses or proposals on alternative measures.

Complaints handling

To assess whether operators' CHPs are effective we need to understand the experience of people making complaints and how this changes over time. We would continue to collect data on the volume of complaints, type of complaints made, methods of raising complaints and appeals, as currently published through the data portal.⁵

We may need to consider the relevance or role of feedback from customers through social media. ORR has recently surveyed operators on their use of social media and recording of complaints, and has invited views from operators on options for recording this data. Our approach to CHPs will be guided by these results. We will address treatment of complaints via social media more fully in our proposed revision of CHP guidance.

Question 4(a) above refers to the following examples of core data.

⁵ For complaints data, see 'Passenger rail service satisfaction' at:
<http://dataportal.orr.gov.uk/browsereports/14>

Table 1 – example data for CHPs

Example measure	Reason and issues
<p>1) Proportion of cases successfully closed [within XX days]</p>	<p>This focuses on successful resolution of complaints and is a measure of ‘first time resolution’. We would need to consider whether the current measure of “<i>complaints answered within 20 working days</i>” remains useful within this context.</p> <p>Definitions would need to be clear to make measurement as simple as possible, but guard against perverse incentives to close cases early or too soon, whether or not resolved successfully. This would need to allow for correspondence between the operators and complainant to query issues, or ensure that the complainant considers their complaint successfully resolved.</p> <p>The period of time used to assess successful closure could be based on the current 20 working days, or the standards in Article 27 of the Rail Passenger Rights and Obligations Regulation 2009, which allows one month for most responses and no more than three months in exceptional cases, or some other timescale.</p>
<p>2) Average response times</p>	<p>Some operators currently collect a measure of average response time (ORR also used to collect data on average response times).</p> <p>This measure complements other performance or satisfaction measures, for example if considered alongside successful case closures. Practical issues may arise where more than one piece of correspondence is needed to resolve a query, and to ensure that simple ‘holding’ responses do not distort overall results. There are also some measurement questions around whether this should focus only on resolved complaints (as above), or an average of all response times.</p>
<p>3) Satisfaction with complaint handling</p>	<p>This would focus on the experience of those that have made a complaint and most likely would use a survey methodology.</p> <p>Individual operators may need to conduct their own survey,</p>

Example measure	Reason and issues
	<p>call backs or mystery shopping. However, there may be merit in a central body undertaking this on behalf of operators. Although some operators already undertake surveys these may not focus on complaint handling alone.</p> <p>The frequency and sampling of a survey would need to be sufficiently robust to ensure statistically significant results.</p>
4) Proportion of cases appealed (or closed) to Passenger Focus / LTW	This data is currently collected, and indicates trends where complaints have not been successfully resolved. In addition to measuring 'appeals opened', we are considering the merits of measuring 'appeals closed'. One or both measures may be relevant to monitor success at complaint handling.
5) Total 'customer contacts' and proportion of complaints	This would measure the volume of contacts, via any channel, between operators and consumers. It would enable a distinction between the feedback and enquiries that operators receive and the volume of specific complaints, setting these into a wider context.
6) Improvement actions taken to resolve complaints	<p>This measure would seek to identify actions taken by operators to address the root causes of complaints, or otherwise act on feedback learned from complaints.</p> <p>This measure could attempt to assess the impact or success of actions taken in response to specific complaints, or a range of actions to address a category or trend in the types of complaint.</p>

DPPPs

At present there is little or no information publicly available on the use of the rail network by disabled people, the types or volume of assistance supplied by operators or their success at meeting peoples' needs. Valuable research is undertaken from time to time, such as the recent Passenger Focus mystery shopping published in March 2014, which provides a 'snap-shot' of current performance. More consistent and regular data would help to identify opportunities for improvement sooner, recognise good practice and support more informed debate about supporting cost-effective use of the railway by disabled passengers.

Question 4(a) above refers to the following example measures.

Table 2 – example data for DPPPs

Example measure	Reason and issues
<p>1) Proportion of Passenger Assist journeys successfully completed</p>	<p>This measure focuses on delivery of assistance for an end-to-end journey, in particular based on information recorded in the Passenger Assist booking system.</p> <p>Issues to be addressed include:</p> <ul style="list-style-type: none"> • Whether to assess satisfaction of the passenger with the ‘overall’ experience, or with different parts of the process (booking, the experience at the departing and arrival stations at the station, the journey) especially if more than one operator is responsible for providing assistance (or whether data for ‘multi-operator’ journeys should be treated separately – see 9 below) • Whether additional commentary should be provided to help interpret results • Methodology issues, such as ensuring appropriate samples sizes and representativeness • How to account for operators’ current experience of using the Passenger Assist system and their existing processes to ensure a passenger’s journey is successful.
<p>2) Satisfaction with Passenger Assist</p>	<p>Passenger Assist is an important service for disabled passengers and a key part of the obligations on operators. Satisfaction with the service would be a key indicator of its success and effectiveness.</p> <p>A number of operators currently make ‘call-backs’ to passengers that have used Passenger Assist to understand whether the assistance successfully met their needs. This may offer a suitable methodology, presuming it is sufficiently robust to ensure statistically significant results.</p> <p>In addition, as above, where assistance is provided across more than one operator it may be necessary to determine if or how to ‘allocate’ results to any specific operator.</p>
<p>3) Satisfaction of disabled passengers using station and train facilities</p>	<p>It is important to understand the experience of disabled passengers that do not use Passenger Assist. Investments in station layout, signage or other features are a key part of the measures to improve the experience of disabled passengers. In particular, this is important to support independent, confident, journeys.</p>

Example measure	Reason and issues
	In this case, the frequency or method of measurement may be especially important if relatively low numbers of disabled passengers travel that do not use Passenger Assist.
4) Total number of booked Passenger Assists	A measure to show the total number of passengers that receive assistance via Passenger Assist.
5) Type of booked Passenger Assist	<p>A measure of the types of services or facilities needed or offered to disabled passengers.</p> <p>This measure would offer some information on the sorts of services or needs of people using Passenger Assist, and perhaps offer insight about the types of investments to help people make independent journeys.</p> <p>This measure could be combined with 4 above to understand the most or least required forms of assistance, including alternative accessible transport.</p>
6) Total number of complaints relating to disabled travel	A specific measure of volume of complaints related to disabled travel. This should be reported on a basis consistent with other complaints data.
7) Type of complaints relating to disabled travel	A description of the main causes or issues of complaints.
8) Number of complaints about booked assistance/journeys as a proportion of assisted journeys	A measure of the relative success of assistance supplied given the volume of booked assistance supplied.
9) Cross-boundary delivery of assistance	<p>A concern with the current system expressed during our workshop and other engagement is the effectiveness of assistance once passengers change operator.</p> <p>A separate measure, or a specific category for cross-boundary assistance, would aim to identify the number of such journeys and their relative success, either in terms of proportion of journeys successfully completed or a measure of satisfaction.</p>
10) Actions taken to improve quality of assistance	<p>Where journeys are not successfully completed, or complaints are raised, it is important to effectively address the root causes.</p> <p>This measure would seek to identify the actions taken to</p>

Example measure	Reason and issues
	address the causes of failures. This would most likely be a qualitative assessment, but would also depend upon good records that demonstrate that operators can identify and respond to failures.
11) Awareness of assistance available	<p>A key finding of ORR's research is the low awareness amongst disabled people of assistance available to them.</p> <p>Operators take a number of actions to help raise awareness or confidence in the use of railways, for example 'try a train day'. We would like a measure of the effectiveness of operators' approaches to raising awareness. We recognise that this is difficult, for example, because routes overlap or awareness may be affected by other promotional activities.</p> <p>We invite views on how we could best monitor what operators do to raise awareness of the help available through their DPPPs.</p>