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15 August 2016

Peter Austin
Managing Director
London Overground Rail Operations Ltd.

Dear Peter,

Approval of London Overground Rail Operations 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 and London TravelWatch .

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

- Your recently launched ‘Tell CR’ mobile app on all company iPhones and iPads allowing staff to report all on-the-spot concerns presented;
- Your aim to respond to passenger complaints within 10 working days; and
- The development of a complaint reduction plan which will include initiatives to tackle root causes of complaint, provide a mechanism for staff to report emerging issues before they become a cause for complaint and ensure that feedback from customers is used in the most effective way.

During the review of your CHP London TravelWatch raised a number of concerns regarding how easy and accessible your complaints process is to consumers. In order to address these concerns you have:

- Created a separate ‘customer guide’ document to allow passengers to easily access the essential information on your complaints procedure; and
- Revised your webpage, creating a separate complaints handling page including links to your documents and information on your complaints handling service standards.



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 London TravelWatch 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 LOROL, the relevant passenger body is London TravelWatch. 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



Complaints Handling Procedure

A customer guide

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Making a complaint about London Overground

If you have a complaint or concern about London Overground, you can speak to any member of staff at our stations or on our trains. If your concern cannot be resolved in this way please contact our Customer Services Team.

The Customer Services Team can be contacted:

- By telephone on 0343 222 1234* the team is available to handle complaints about London Overground between 0900 and 1700 Monday to Friday except public holidays; travel information is available on this number 24 hours a day
- By e-mail to overgroundinfo@tfl.gov.uk
- Via the TfL website at tfl.gov.uk/overground
- In writing to
Freepost RSTY-TJRK-JRUG
London Overground
Customer Services Team
Overground House, 125 Finchley Road
London, NW3 6HY
- Using a 'Contact us' form, provided on request at our stations, which can be sent to the Freepost address above
- By Minicom textphone on 020 3031 9331 (0900 - 1700 Monday to Friday except public holidays)

*Service and network charges may apply.
See tfl.gov.uk/terms for details.

Making a complaint about London Overground (continued)

Please provide us with as much information about your complaint as possible, including your journey and ticket details where necessary.

Our team are happy to liaise with a carer, support worker or guardian on your behalf if you find it difficult to use the methods on the previous page.

If your complaint relates to your Oyster or contactless payment you can check your account online and apply for incomplete journey, product or delay refunds at tfl.gov.uk

How we will deal with your complaint

If your complaint relates to any service other than London Overground we will pass your complaint to the appropriate operator. We will let you know we have done this.

Penalty fare appeals are managed by an independent third party, IRCAS. We are unable to intervene with this regulated process.

If your complaint relates to a third party service, such as an online ticket retailer, we will provide you with their contact details and ask you to contact them directly.

How we will deal with your complaint (continued)

When we receive a written complaint from you, we will let you know that we have received your complaint within one working day. This will include your case number and how long we expect to take to respond. We will also give you advice on how to contact us if you need an urgent response.

Timescales

We aim to respond in full to complaints within 10 working days, although we recognise that some complaints may take longer to investigate. As such our target, under normal circumstances, is to respond in full to 95 per cent of complaints within 20 working days. If we are unable to respond to a complaint within this time period, we will keep you informed of our progress.

Vexatious complaints

As a last resort we may terminate correspondence with you before resolution has been reached if we believe your communication to be frivolous or vexatious. If correspondence is terminated, you will be provided with the option to appeal.

If you are not happy with our response

If you are unhappy with our first response, you are entitled to make an appeal to London TravelWatch, the appeals body covering London Overground. We will provide you with their contact details, which are:

- By telephone on 020 3176 2999; available between 0900 and 1700 Monday to Friday
- In writing to:
London TravelWatch
169 Union Street,
London SE1 0LL
- By e-mail to
enquiries@londontravelwatch.org.uk
- Using the online complaint form at
www.londontravelwatch.org.uk/complaints/online

The Consumer Disputes (Competent Authorities and Information) Regulations 2015, requires us to advise you of an Alternative Dispute Resolution (ADR) organisation that you may contact if you are unhappy with our response. Please visit The Consumer Ombudsman website www.consumer-ombudsman.org for further information.

If you are not happy with our response (continued)

As London TravelWatch already provides a mediation service for our customers, we do not make use of the ADR process. Any disputes raised via this route will be directed to London TravelWatch to review.

Compensation

Refunds are available to you if your journey was delayed by more than 30 minutes. For further information please visit tfl.gov.uk/refunds. If you do not have online access please call the Oyster Helpdesk on 0343 222 1234*.

Data protection

We work with the industry regulator, the Office of Rail and Road, to understand how satisfied our customers are with the handling of complaints. You may be asked to complete a short online survey after we have responded to your complaint. If you do not wish to take part, we will provide you with the opportunity to opt out of all future surveys.

Our privacy policy can be viewed at:

<http://www.lorol.co.uk/go/customer-information/complaints-handling>

*Service and network charges may apply. See tfl.gov.uk/terms for details.

Complaints Handling Procedure

The full version of our Complaints Handling Procedure can be viewed at:

<http://www.lorol.co.uk/go/customer-information/complaints-handling>

LONDON OVERGROUND RAIL OPERATIONS LIMITED

Customer Services

Complaints Handling Procedure

Complaints Handling Procedure

March 2016

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Appendices

Version

Issue 1	March 2016
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Changes to this version

None	First issue
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1 Introduction

London Overground Rail Operations Limited (LOROL) operates London Overground on behalf of Transport for London (TfL).

This document is intended to provide an overview of the arrangements that LOROL has in place to handle complaints, feedback and enquiries about our service. Our customers will generally make contact with us in the following ways:

- via any member of our customer-facing teams, which include but are not limited to our people working at our stations and on our trains, our Revenue Protection staff and any staff from third-party organisations working on our behalf
- via our Customer Services Team, based at LOROL's head office in London by telephone, textphone or e-mail, in writing or via the TfL website

Our arrangements are designed to provide an easily accessible and efficient complaints handling service to our customers, which in turn delivers useful feedback for us to improve the service we offer. These arrangements comply with the current version of the Office of Rail and Road (ORR) Complaint Handling Procedure Guidance and LOROL will continue to review these arrangements on an annual basis or whenever an update to the Guidance is published.

1.1 Definitions

Contact from our customers and potential customers can take several forms, which can be defined as follows:

- **Complaint** - “any expression of dissatisfaction made to or escalated to our Customer Services Team about the delivery of our service or our customer policies”
- **Feedback** – “any comment, either positive, neutral or negative, made to or escalated to our Customer Services Team about our services that does not require corrective action, a change of services or a formal review”
- **Enquiries** – “any request for information made to our Customer Services Team about our service”
- **On-the-spot concern** – “any complaint, feedback or enquiry made to any member of our customer-facing teams”

2 Our customer contact process

2.1 Contacting us

2.1.1 Raising concerns in the first instance

We encourage customers to make contact on-the-spot with our customer-facing teams if they are dissatisfied with any aspects of the service we provide. We believe that the majority of concerns can be resolved more swiftly in this manner.

Our customer-facing staff are encouraged to take ownership of and to resolve complaints on the spot without the need for management intervention. Management support is available during core operating hours seven days a week and there is additional support from our Control Centre and Customer Service Resource Centre at all other times.

We appreciate that there are times when customers want to report issues, without having to make direct contact with our Customer Services Team. Our staff will be able to register customer concerns reported to them using the 'Tell CR' (Customer Relations) form on their smart device. Any concerns logged in this way will be sent to our Customer Services team and monitored for trends, with relevant feedback sent directly to appropriate managers.

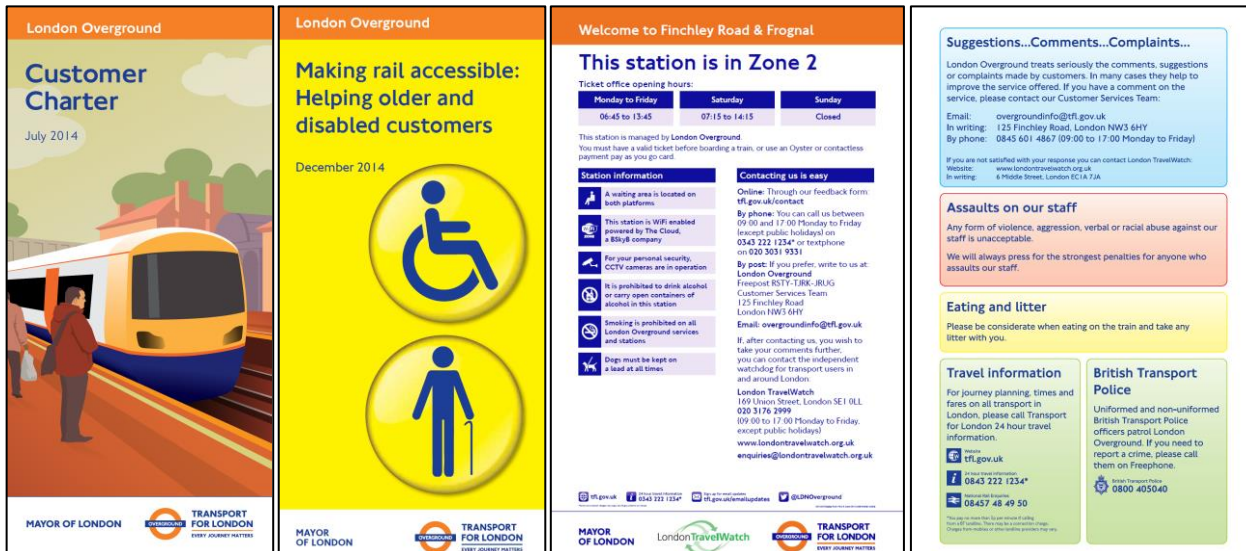
If any concerns cannot be resolved in this way, customers may contact our Customer Services Team for further assistance.

2.1.2 Making contact with our Customer Services Team

To make a complaint, customers are encouraged to make contact with our Customer Services Team. We promote the contact details and opening times for the team, in the following ways:

- In our 'Customer Charter, 'Contact us' and 'Making Rail Accessible' publications, available online at **tfl.gov.uk**, from our stations or from our Customer Services Team
- On posters displayed at our stations; where services of other operators' call at our stations, we provide the relevant contact details for those operators
- On information displays on our trains
- Via the TfL website at **tfl.gov.uk/overground** – click on 'Contact London Overground' to access our contact form

All these publications contain details of London TravelWatch, who the customer may contact if they are not satisfied with our response



The Customer Services Team can be contacted:

- By telephone on **0343 222 1234**; the team is available to handle complaints about London Overground between 0900 and 1700 Monday to Friday excluding bank holidays; travel information is available on this number 24 hours a day
- By e-mail to **overgroundinfo@tfl.gov.uk**
- Via the TfL website at **tfl.gov.uk/overground**
- In writing to **Freepost RSTY-TJRK-JRUG, London Overground, Customer Services Team, Overground House, 125 Finchley Road, London, NW3 6HY**
- Using a 'Contact us' form, provided on request at our stations, which can be sent to the Freepost address above
- By Minicom textphone on **020 3031 9331**

For customers who find that our methods of communication are inaccessible to them, we are happy to liaise with a carer, support worker or guardian on a customer's behalf with their permission or authority. We regret that our Customer Services Team do not respond to complaints in person at our head office.

When making a complaint, we recommend that customers provide us with as much detail as possible, including any supporting evidence or documentation or details of specific trains, stations or members of staff. Our comments and web forms are designed to collect all relevant information. To ensure that we can respond to complaints swiftly, reduce the need to request further information and ensure that we can appropriately investigate the concerns raised, we recommend the following details are included in any correspondence:

- Name, telephone number and email or postal address
- Oyster card or ticket number
- Journey details (date, time and stations travelled between)
- Comments explaining the nature of the concern

For complaints relating to charges on your Oyster or contactless payment card customers are recommended to check their account online at tfl.gov.uk. Registering for an online account provides access to the following services:

- View journey history for at least the last eight weeks
- Apply for incomplete journey, product or service delay refunds
- Purchase products

When customers are unable to resolve their payment query online they should contact TfL customer services, either online or by calling 0343 222 1234. Lines are open from 0800 to 2000, seven days a week. If customers contact London Overground with queries relating to Oyster or contactless payment cards, their correspondence will be passed to the correct department. We will inform customers when this has happened.

We can only handle complaints regarding London Overground (e.g. complaints relating to the trains, ticket offices or stations that we operate), including where the impact of the complaint arose on another part of the journey.

Where a complaint relates to any other TfL service or infrastructure, National Rail service, Network Rail managed station or infrastructure, we will pass the complaint to the appropriate operator on the customer's behalf. If a complaint relates to Network Rail as a supplier (e.g. where a signal failure causes delays) we will handle the complaint in line with this procedure. Where a complaint is made about services which are wholly managed by a third-party provider, such as an online ticket retailer, we will ask customers to contact the provider directly. Where a third-party provides a service on our behalf, such as car park management, we will handle the complaint in line with this procedure and liaise with the provider on the customer's behalf.

On occasions, a complaint may relate to the services of a number of different operators. Where the bulk of the issues relate to a journey on London Overground, we will liaise with the other operators involved and provide a single response to the customer. In all other cases, we will answer those complaints related to London Overground and pass all other complaints to the appropriate operator on the customer's behalf.

We work with the industry regulator, the Office of Rail and Road, to understand how satisfied our customers are with the handling of complaints. Customers who contact us may be asked to complete a short online survey. Answers will be used to help improve the way rail travellers' complaints are handled in future. If a customer does not wish to take part, we will provide them with the opportunity to opt-out of all future surveys.

As LOROL operates London Overground on behalf of TfL, we do not operate our own customer information websites or social media channels. The London Overground social media channels are operated by TfL and their policy can be found at tfl.gov.uk/corporate/terms-and-conditions/social-media. When customers register complaints on social media, they will be directed to our web form so that they can register their complaint through formal channels. In addition LOROL will publish this procedure and provide contact details on our corporate website at www.lorol.co.uk.

Frequently asked questions are answered in the help and contact section of the TfL website.

2.2 Recording and acknowledging complaints

2.2.1 Recording complaints

All complaints received by our Customer Services Team are recorded into our Customer Relations Management (CRM) database, including an electronic scan of any original correspondence. The system is used to manage correspondence from beginning to end and allows us to report on customer complaints. Data is stored in a format that allows for it to be shared with the Office of Rail and Road, including the use of industry wide complaint categorisation.

Paper records are held for at least seven years and then destroyed by LOROL. Electronic records, stored in our CRM database, will be retained during the life of the current London Overground concession.

If a complaint relates to an accident, injury or near miss on our stations or trains, the Customer Service Team will check if the incident has already been recorded in our Safety Management System. If not, the advisor will complete an accident form on behalf of the customer and submit it to our safety team and local manager for investigation in line with our Safety, Quality & Environment procedures. The safety team will consider if any accidents reported in this way require reporting to the Office of Rail and Road under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.

2.2.2 Acknowledging complaints

When we receive a complaint by e-mail, via the TfL website or in writing, we will send an acknowledgement to confirm that we have received the complaint. We aim to acknowledge all complaints within one working day. If we have passed a complaint to another operator to respond, we will inform the customer of the operator who will be handling their complaint.

When customers receive an acknowledgement from us, they will also be provided with:

- Our timescales for responding to their complaint
- Their case reference number
- Advice on how to contact us if their need for a response is more urgent

At times, we may receive a sudden or unexpectedly large increase in the volume of complaints, for example during an extended period of severe service disruption. When this occurs, we will provide a warning in the acknowledgement that response times are likely to be extended.

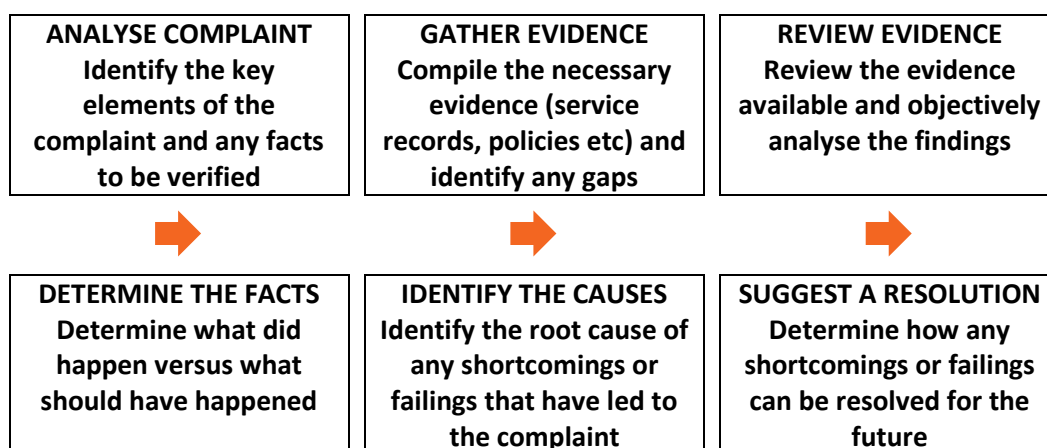
2.3 Investigating complaints

2.3.1 Determining the need for investigation

When we receive a complaint, it will be assessed to determine the level of investigation required. This process is undertaken by the customer service team as the case is recorded in our database.

2.3.2 Conducting investigations

Where it is determined that an investigation is required, the details of the complaint will be passed to the appropriate manager to investigate. Our managers take the following steps when conducting complaint investigations:



Once the investigation has been completed, the findings will be passed to the Customer Service Team to allow them to respond in full to the customer.

Penalty fare appeals are managed in line with legislation by an independent third party, Independent Revenue Collection and Support (IRCAS). Our Revenue & Prosecutions Lead oversees the appeals process and reviews any complaints received by our Customer Service Team. However, we are unable to intervene with this regulated process.

2.3.3 Identifying trends

Our Customer Communication Manager monitors all complaints and reports the top three complaint areas to our Executive team each railway period through our Customer Service Dashboard.

Additionally each period the Customer Communication Manager and Head of Customer Service Development will identify complaints involving systemic issues. Once such an issue has been identified, a commentary of the issue is provided to the relevant Director for investigation and feedback provided to the Customer Services Team. Once the investigation has been completed the Director will report back to the Customer Service Team. Where an issue is likely to have a significant impact on the key customer service measures used to monitor our performance (which includes our customer satisfaction surveys), the Head of Customer Service Development will develop a proposed improvement plan for presentation to our Executive team.

2.4 Responding to complaints

2.4.1 Response times

We aim to respond in full to complaints within 10 working days, although we recognise that some complaints may take longer to investigate. As such our target, under normal circumstances, is to respond in full to 95% of complaints within 20 working days.

If we are unable to respond to a complaint within this time period, we will keep customers informed of the progress of their complaint and advise them of the expected timescale for a full response. Under normal circumstances, we would expect to respond in a further period of 20 working days.

If we receive a sudden or unexpectedly large increase in the volume of complaints, timescales for responding to customers will be extended. We will use all reasonable endeavours to respond to customers as quickly as possible.

2.4.2 Response standards

Our Customer Communication Manager is responsible for response standards. We regularly review samples of correspondence to ensure that standards are maintained and monitor this process in line with our ISO:9001 accreditation.

Our team are trained to identify the needs and expectations of customers making complaints with all staff having recently completed the WorldHost customer service training programme. We follow TfL's Editorial Style Guide which sets the standards for our team to follow including guidance on plain English and the use of acronyms.

2.4.3 Frivolous or vexatious complaints

As a last resort we may terminate correspondence with a complainant before resolution has been reached if we believe the communication to be frivolous or vexatious. This decision will be made by our Customer Communication Manager and notified to the Head of Customer Service Development. If correspondence is terminated, the complainant will be provided with the contact details of London TravelWatch and our ADR statement (see Alternative Dispute Resolution later in this document).

2.5 Considering claims for compensation

2.5.1 Compensation

Service Delay Refunds are available to customers whose journeys have been delayed by more than 30 minutes. This scheme is managed by TfL customer services in line with London Overground's Customer Charter, a copy of which can be found at www.tfl.gov.uk. For further information please visit tfl.gov.uk/refunds or take a look at our PIDD Local Delivery Plan, which can be found on the LOROL website at www.lorol.co.uk/go/travel.

Our disruption warning and apology posters proactively include details of compensation arrangements. Compensation payments are managed by TfL on our behalf and there have been London-wide campaigns to educate customers about how to claim. When customers contact our Customer Services Team and are entitled to a service delay refund, they will be informed how to apply for this.

Our Customer Service Team are authorised to provide goodwill gestures in appropriate circumstances. The use of goodwill gestures is considered on a case by case basis.

2.6 Escalations and appeals

2.6.1 Escalations and appeals

If a customer is unhappy with our first response, we will provide details of the right to appeal to London Travelwatch in our second substantive response. London TravelWatch, the appeals body covering all services operated or licensed by TfL, may be contacted in the following ways:

- By telephone on **020 3176 2999**; available between 0900 and 1700 Monday to Friday
- In writing to **London TravelWatch, 169 Union Street, London SE1 0LL**
- By e-mail to **enquiries@londontravelwatch.org.uk**
- Using the online complaint form at **www.londontravelwatch.org.uk/complaints/online**

We will also continue to make efforts to resolve the complaint ourselves and where necessary complaints are escalated to the Customer Communication Manager to review. Ongoing or complex cases may be escalated to TfL's Executive Complaints Team. Where we identify that our escalation process has been exhausted, customers will be referred to London TravelWatch.

London TravelWatch and Transport Focus (the passenger watchdog bodies in the UK) have drafted an Appeals Protocol and are consulting on its content with the rail industry. LOROL will participate in this consultation and follow this protocol once it is agreed.

When LOROL receive an appeal from London TravelWatch we will undertake to respond in the following timescales:

- provide acknowledgement to London TravelWatch within three working days;
- provide copies of case correspondence within five working days;
- respond to appeal submissions within 10 working days or a maximum of 20 working days where an appeal is complex.

2.6.2 Alternative dispute resolution (ADR)

In addition to the services provided by London TravelWatch, the Consumer Disputes (Competent Authorities and Information) Regulations 2015, requires us to advise customers of an ADR organisation for their complaint. In our case this is The Consumer Ombudsman www.consumer-ombudsman.org.

As London TravelWatch already provides a mediation service for customers in the rail industry, we do not make use of the ADR process. Customers do have the option of contacting the Consumer Ombudsman directly; however any disputes raised via this route will be directed to London TravelWatch to review.

This information will be included, in the form of a statement (our ADR statement), in our publicity information and in any second substantive response to a customer.

3 Our approach to customer contact

3.1 Our policies

3.1.1 Complaints Handling Procedure

This Complaints Handling Procedure will be published on the LOROL website at www.lorol.co.uk/go/travel.

3.1.2 Representing the customer

We provide regular updates to the business on key customer concerns and direct complaints deemed relevant for investigation to the appropriate manager. Any complaints raised against a member of staff are recorded in a secure database and sent to local managers for investigation to establish root cause. Every staff complaint and subsequent investigation is reviewed by a senior manager to ensure that all factors have been taken into consideration, including any potential lone working or fatigue issues.

In 2016 we will trial a scheme to encourage customers to reward good customer service. Initially we will work with customers who have previously contacted us and supply them with cards that they can present directly to staff members when they receive great service. If the scheme is successful we will consider wider use of these cards.

We have also recently launched our 'Tell CR' (Customer Relations) mobile app on all company iPhones and iPads. This app allows our staff to report all on-the-spot concerns and service issues that are informed to them by our customers. In addition to the complaints received by our Customer Services Team, this will give us an extra source of feedback to allow us to understand the needs of our customers and help to place the customer at the centre of our decision making.

3.1.3 Passenger group

The London Overground passenger group is a forum for LOROL to communicate with passengers and their representatives (i.e. user groups). At least one LOROL Director attends every meeting of the group. The group also provides a forum for passengers to provide feedback or raise issues on service quality and standards. Enquiries regarding the passenger group should be made to our Customer Services Team.

3.1.4 Customer Contact Privacy Policy

Our Customer Contact Privacy Policy sets out what information we collect about customers making complaints, providing feedback, making enquiries and / or reporting on-the-spot concerns under this Complaints Handling Procedure, how such information is used (and may be shared) and how it is kept secure, as well as how customers can request details of the information that we collect about them. Our current Customer Privacy Policy is shown in Appendix 1n.

3.1.5 Website Privacy Policy

In conjunction with and in addition to the Customer Contact Privacy Policy, LOROL's "Website Privacy Policy" sets out what information we collect about customers via the LOROL website, how such information is used and how it is kept secure, as well as how customers can request details of the information collected via the LOROL website. Our current "Website Privacy Policy" can be found at <http://www.lorol.co.uk/go/1/privacy>.

3.2 Customer Services Team

3.2.1 Organisational structure

Our Customer Services team sits in the Customer Service Development team in the Customer Service Directorate. The Customer Service Development team uses customer feedback alongside other metrics to plan improvements to the London Overground service.



In addition to our permanent Customer Relations Advisors, we also have a pool of staff within other areas of the business who are able to strengthen the team in times of high complaint volumes. These staff are trained as Customer Relations Advisors and bring a wider knowledge of the organisation to the team.

3.2.2 Our service standards

In this document we have set out how we manage customer complaints and the standards we have set. The following table outlines our key standards and provides a cross reference to where these standards can be found:

Complaints handling procedures are subject to high level governance

- 4.2 - Customer Service Team

Complaints handling process is easily accessible and easy to use

- 2.1.2 - Making contact with our Customer Services Team

Complaints handling staff are well trained and professional

- 3.2.3 - Training and recruitment

Complaints will be fully and fairly investigated

- 2.3 - Investigating complaints

Complaints will be answered in full within 20 working days or sooner where possible

- 2.4.1 - Response times
- 4.2.3 - Response times

Complainant will be kept informed of progress of his/her complaint

- 2.2.2 - Acknowledging complaints

Complaints will be resolved to the satisfaction of the complainant and the organisation will address systemic issues and learn from them

- 2.5 - Considering claims for compensation
- 3.1.2 - Representing the customer
- 4.1.2 - Review and improvement
- 4.2.2 - Complaints reduction

Complainant will be advised of his/her right to representation and signposted to relevant passenger watchdog

- 2.6 - Escalations and appeals

3.2.3 Training and recruitment

All our frontline staff undergo regular customer service training. In 2016, we will be delivering the WorldHost customer service programme. The objective of this course is to provide all customer-facing staff with the skills to take customer service to the next level. All customer service managers will also complete this programme, along with a further session that is designed to help managers to coach and develop our staff to be able to provide an even better level of service to our customers.

The Customer Service Team recruitment criteria have been developed to identify the appropriate skills for complaints handling. On appointment, team members are trained in complaints investigation and resolution skills. We are proud that the majority of our team have been appointed from within the business and have a detailed understanding of our service and the company.

Our Customer Services Team will be briefed on this document on an annual basis. The Customer Communication Manager will ensure that the standards are maintained through quality sampling and provide staff coaching where required.

Our frontline teams will be briefed whenever the procedure is updated. Our quarterly Quality Performance Regime, managed by TfL, includes questions on our Complaints Handling Procedure. Results from this regime are used by our station management team to identify any issues and plan improvements.

3.2.4 Data sharing

When correspondence is identified as solely or mainly relating to the services of another operator we will pass it on to the appropriate body. When we do this we will notify the customer and provide the details of the other operator.

In certain circumstances it is necessary to share information with TfL or London TravelWatch to investigate complaints. When we do this we will notify the customer and provide the details of the other party.

4 Our approach to continuous improvement

4.1 Customer service delivery

4.1.1 Review and improvement

We review a number of metrics to assess our customer service performance, which include the following:

- Numbers of complaints received
- National Rail Passenger Survey
- TfL's Customer Satisfaction Survey
- TfL's Mystery Shopper Survey
- TfL's Quality Performance Regime
- TfL's Assisted Traveller Mystery Shopper Survey

These metrics are reported on our Customer Service Dashboard which is presented to our Executive team every railway period. Our Customer Service Development Team review all our customer service metrics and are responsible for developing and implementing plans to improve performance.

Where one or more of our metrics experiences a sustained adverse trend, we use a range of data, including verbatim feedback from customer complaints, to formulate our plans to improve performance. On an ongoing basis, verbatim feedback is sent to relevant managers across the business to provide an early warning of a potential adverse trend.

4.2 Customer Services Team

4.2.1 Complaint reduction

We aim to reduce complaints from customers where possible and are developing a complaints reduction plan, which will include initiatives to tackle root causes of complaint, provide a mechanism for staff to report emerging issues before they become a cause for complaint and ensure we use the feedback from customers in the most effective way.

4.2.2 Response times

We review response times on a regular basis and report our average response times and performance against our targets to TfL each period.

If we receive a sudden or unexpectedly large increase in the volume of complaints which will lead to extended response times, we will inform ORR, TfL and London TravelWatch at the earliest opportunity of:

- the reason for the increase in the volume of complaints
- the expected duration
- our plans to remedy the situation, whilst ensuring the quality of responses is maintained
- the steps we have taken to advise affected customers

4.3 Annual review

4.3.1 Annual review of this procedure

Our Head of Customer Service Development is responsible for undertaking a review of these arrangements on an annual basis or whenever an update to the Guidance is published. We may decide to make changes to this document following review or if the ORR or TfL determine that changes are required.

We will always consult with the ORR, TfL and the statutory watchdogs for transport users, London Travelwatch, before making any material changes to this document.

Appendices

Appendix 1

Customer Contact Privacy Policy

Purpose

The objective of this Customer Contact Privacy Policy is to ensure that:

- Personal data is processed by LOROL in compliance with the requirements of the Data Protection Act 1998 (the **Act**) as may be amended or superseded from time to time and all other applicable legislation, codes of practice or other guidance issued by the Office of the Information Commissioner amended or superseded from time to time relating to the processing of personal data; and
- LOROL staff are aware of their obligations when processing personal data on behalf of LOROL.

Scope

This policy shall be applied by all LOROL staff to the processing of all personal data received from customers making Complaints, providing Feedback, making Enquiries and / or reporting On-the-spot concerns under the Customer Contact Policy. It sets out how LOROL uses and protects any information that customers give to LOROL when making Complaints, providing Feedback, making Enquiries and / or reporting On-the-spot concerns via the contact methods set out in paragraph 2.1.2 of the Complaints Handling Procedure.

Policy statement

1. LOROL will comply with the Act as may be amended or superseded from time to time and adhere to the eight data protection principles as laid out in the Act.
2. LOROL will comply with the statutory requirement to maintain an accurate entry on the Information Commissioner's public register of data controllers which describes the purposes for which personal data is processed.
3. LOROL will comply with other relevant legal requirements as may be amended or superseded from time to time where they apply to its processing of personal data, including:
 - The Human Rights Act 1998 and the requirement to act in a way which is compatible with the right to respect for private and family life in the European Convention of Human Rights and Fundamental Freedom.
 - The Privacy and Electronic Communications (EC Directive) Regulations 2003.
 - The common law duty of confidence.
4. LOROL will adhere to the requirements set out in the following standards, policies and guidance as may be amended or superseded from time to time in order to support its compliance with the Act :
 - The Information Commissioner's suite of guidance documents and codes of practice.
 - The Payment Card Industry Data Security Standard (PCI DSS).
 - LOROL's Data Protection Policy.
 - LOROL's IT Acceptable Use Policy.
 - LOROL's Website Privacy Policy.
 - This Customer Contact Privacy Policy.

Types of data held

LOROL will collect and process personal data provided by customers via any of the contact methods set out in paragraph 2.1.2 of the Complaints Handling Procedure (such as by email to overgroundinfo@tfl.gov.uk or via the TfL website at tfl.gov.uk/overground).

This data may include:

- Personal details (including name, address, telephone number and e-mail address).
- Financial details (including bank account details such as account number and billing address).
- Goods or services provided (including route(s) travelled, time(s) / date(s) of travel, general usage of the London Overground).

LOROL will promptly correct, rectify, block or erase information notified to it by a customer as being incorrect or incomplete information.

Uses made of the data

LOROL will use the personal data collected about customers to:

- Investigate and resolve customer Complaints, Feedback, Enquiries and On-the-spot concerns.
- Keep internal records of Complaints, Feedback, Enquiries and On-the-spot concerns.
- Improve its products and services.
- Where customers have consented, periodically send promotional emails about new products, special offers or other information which we think customers may find interesting using the contact details provided.
- From time to time (and subject to customer preferences) use the contact details provided by customers for market research purposes.
- Carry out such actions as needed to undertake to comply with laws and regulations and/or liaise with regulators.

Sharing of data with third parties

LOROL may share customer personal data with:

- Third parties when the Complaint, Feedback, Enquiry and / or On-the-spot concern relates to services provided by a third party service provider. LOROL will inform customers when their personal data is shared with a third party service provider.
- Group companies and third party providers to the extent used to provide services to LOROL in relation to Complaints, Feedback, Enquiries and / or On-the-spot concerns.
- Where required, travel watchdogs, regulators, law enforcement agencies and / or government bodies.

Any of these entities may be located outside of the EEA and therefore personal data collected and shared with such entities may be transferred to, stored and processed outside of the EEA.

Storing of data

LOROL are committed to ensuring that customer personal data is held securely. In order to protect against unauthorised access or disclosure LOROL have put in place reasonable physical, electronic and managerial procedures to safeguard and secure all customer personal data. However, no collecting of personal data is guaranteed to be completely secure, as it may be possible for third parties, not under the control of LOROL, to intercept or access transmissions or private communications unlawfully. Whilst LOROL strive to protect personal data, neither LOROL or its third party service providers can ensure or warrant the security of any information given to LOROL or a third party service provider and any such transfer of information (including of personal data) is at the customer's risk.

Our policy

LOROL's policy is to ensure that:

- It has in place structures, systems and processes to manage personal data fairly and lawfully and in a way that ensures its integrity, accuracy, relevance and security.
- In response to a valid subject access request, LOROL will tell a data subject whether it, or someone else on its behalf, is processing that individual's personal data, and if so, provide a description of: the personal data; the purposes of which they are being processed; and those to whom they have been, or may be, disclosed. LOROL will also communicate in an intelligible form, the information which forms any such personal data.
- LOROL will aim to respond to all subject access requests within 40 calendar days of receipt of a valid request.
- In response to a subject access request, LOROL will only refuse to provide a copy of the personal data which it is processing (and any associated information concerning its processing) if a statutory exemption applies or guidance permits. Any such refusal must be approved by the LOROL Data Manager.
- Personal data used for communicating with LOROL's customers (including for marketing purposes) will be treated in accordance with the preferences they have expressed. Customers may choose to restrict the collection or use of their personal data in the following ways:
 - whenever customers are asked to fill in a form, they should look for the box to allow them to consent to information to be used by anybody for direct marketing purposes
 - marketing for London Overground is managed by TfL and LOROL do not share personal data with TfL for this purpose.
- Unless in the case of personal data relating to Complaints, Feedback, Enquiries and/or On-the-spot concerns for services provided by a third party service provider, personal data will not be disclosed to third parties except where disclosures are permitted by, or required by, law.
- Procurement processes and contractual arrangements with external service providers must include adequate measures to ensure compliance with relevant data protection principles and associated requirements outlined in this policy.

Surveys

LOROL work with the industry regulator, The Office of Rail and Road, to understand how satisfied our customers are with the handling of Complaints. When customers contact us, they may be asked to complete a short online survey. Customer answers will be used to help improve the way rail travellers' Complaints are handled in the future. If customers do not wish to take part, LOROL will provide customers with the opportunity to opt out of all future surveys.

Responsibility for compliance

1. All LOROL personnel are responsible for actively supporting compliance with this policy.
2. All LOROL employees involved in the processing of personal data must familiarise themselves with the supporting guidance material available on the LOROL Safety, Quality and Environment Manual and Intranet; and with Arriva's data protection eLearning course.
3. Directorate Data Managers are responsible for:
 - Ensuring that LOROL personnel within their area of control are aware of this policy and adequately trained in the handling of personal data.
 - Implementing appropriate procedures to ensure compliance with restrictions on the processing of personal data within their area of control.

4. The LOROL Data Coordinator is responsible for:

- Providing guidance on responsibilities and specific procedures to be followed.
- Investigating and responding to any complaints.
- Carrying out compliance checks to ensure adherence, throughout LOROL, with the Act.

Changes to the Customer Contact Privacy Policy

Any changes that LOROL makes to this Customer Contact Privacy Policy in the future will be posted on LOROL's website at <http://www.lorol.co.uk/go/travel>. Please check back frequently to see any updates or changes to the Customer Contact Privacy Policy.

Contact

Questions, comments and requests regarding this Customer Contact Privacy Policy are welcomed and should be addressed to the **Data Protection Officer at Freepost RSTY-TJRK-JRUG, London Overground, Customer Services Team, Overground House, 125 Finchley Road, London, NW3 6HY** or emailed to overgroundinfo@tfl.gov.uk.

