c2c

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Office of Rail Regulation
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21 November 2014

Dear Philip,

Response to the Office of Rail Regulation's consultation "Towards a code of practice on retail information"

This submission provides the response of c2c to ORR's consultation on the "Towards a code of practice on retail information". We have also worked closely with ATOC in the preparation of its response to this consultation which provides the views of the TOCs collectively to the issues raised by ORR.

In summary we welcome the ORR's initiative to develop a code of practice on retail information. We believe this will be beneficial in setting a framework of principles for retailers to work within, and will provide benchmarks of good practice to help raise standards within the industry, and so benefit consumers.

Our responses to the specific questions posed are below.

Responses to questions posed

1. Given the requirements of consumer law and industry specific obligations, do you agree that the types of information highlighted above and in the associated Annex B are the types of information that passengers need when choosing, buying and using rail tickets?

We agree that the types of information described would generally meet the information needs of passengers, and allow them to make a fully informed decision as to which rail ticket was the most appropriate for their journey.

2. Are there other types of information that should be covered by the Code?

The code is focussed on information required at the point of ticket purchase, and we do not see any particular omissions in the list referred to by question 1. However, in rare cases where a particular point of sale is not an impartial point of sale, we would expect this information also to be clear to the customer.

3. Are there any reasons why any of the information outlined above can't be provided at all, or certain, points of sale?

There are some practical constraints on the information that can be provided which we consider below by retail channel:

- Ticket office – we consider ticket office staff should be able to access the information listed in your Appendix B, and to be able to discuss this information with the customer.

However, at a busy ticket office there can be pressure on both the member of staff and the customer to complete a transaction quickly when there is a queue of customers waiting. This may limit the amount of information actually provided.

- Ticket vending machines (TVMs) – TVMs tends to be targeted at the more regular and knowledgeable customer who wants to quickly choose their preferred ticket without navigating a range of options, and to that end the information provided may be more limited. They tend not to include real time running information because this is available already within the station. Too much information can risk slowing down transaction times and increasing queues so there is a balance to be struck. However, we recognise that less experienced customers sometimes find TVMs hard to navigate, and leave the customer lacking confidence that they have bought the best fare for their journey so there is clearly room for improvement. There are two constraints to be aware of in this area:

  1. Data feeds – considerable work is ongoing in the industry to improve data feeds, for example improving the description of ticket validities and available routes, and supporting customer information. The underlying RSP IT systems supporting fares and reservations are also undergoing fundamental change. The completion of such projects is essential to achieving a step change in ticketing information quality

  2. Customer interfaces – many of the current generation of TVMs have user interfaces which are inflexible to change, or require software development to improve. We consider that opportunity lies in developing the next generation of TVMs to have more flexible interfaces, adapted to allow the customer to easily find the information they require, and to give customers confidence as they step clearly through the purchase decision process. They may also be merit in developing commonality across TVM, website and mobile interfaces so that the customer builds familiarity with the retailer's approach.

- Internet – we consider that all the information you list in you Appendix B should be accessible on retailers' websites and mobile apps as content, allowing customers to 'research' the options available to them before committing to purchase. Again the quality of the ticket data feeds is a constraint on the information that may be presented within the ticket purchase process.

- Call centres - we consider call centres should have access to and be able to provide the information listed in your Appendix B.

4. If there are points of sale at which some of the information outlined above can't be provided, or can't be provided in a form that is useful to passengers, what measures do you take to mitigate for this and ensure that passengers buying their tickets from these points of sale have the information they need to make an informed decision?

Principally, we highlight our customer services telephone number which we recommend as the point of contact for customers in need of assistance if a member of staff is not otherwise available to them. Our advisors are trained to help provide the full range of information needed by our customers. Also, we have recently introduced a new mobile app which we have designed with personalised customer information in mind, and allows customers to access information at any time.

5. Do you agree that a principles' based Code, such as is outlined above, is the best approach? For example, that it would provide the flexibility necessary to address the differing capabilities/uses of different points of sale and/or to respond to future developments?

We support the approach of making the Code 'principles' based. By articulating the four principles as 'output' based it allows scope for a variety of delivery approaches, freedom for innovation and flexibility to accommodate change.

6. Do you agree that the principles outlined above are appropriate to the provision of retail information to passengers? Are there any other principles that you think it would be helpful for the Code to cover?

We believe that the four principles provide a clear and simple but comprehensive framework for the provision of information to customers. We have no additional principles to suggest.

7. Are there any specific issues retailers are likely to face in complying with these principals, given the different characteristics of different sales channels (e.g. Ticket Offices, websites, TVMs, etc.)? For example from a technological, practical or cost perspective?

We have highlighted relevant issues in our responses to questions three and four.

8. Can you provide examples of good and/or bad practice of how retailers already provide information to passengers within this context?

The content within most retailer websites are examples of good practice. They typically allow the customer to find out about different types of tickets, ticket validities and fares, as well as train running information both real time and planned. Questions arising in more niche areas such as assisted travel or group travel can also be answered by navigating to the relevant part of the website.

Staffed points of sale are also typically examples of good practice as the member of staff has a wide range of information available to them and expertise in interpreting the customer's requirements.

TVMs are often good examples of providing focussed information to a core market (e.g. day returns fares to a popular station); but may be less adept at dealing with more complex queries such as those involving groups, multiple choice of routes, or advance travel. We recognise this as an area for improvement which the Code can support.

We trust you find our response helpful and informative and look forward to continuing to work with you in the development of the Code.

Yours sincerely

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