

---

**Confidential Secretariat memorandum**

Author : Mark Donoghue

Agenda item : 14

CA054

Drafted : 5.7.10

---

**London Overground (LOROL) correspondence handling audit**

**1 Purpose of report**

1.1 To submit the draft report of a complaint handling audit of London Overground.

**2 Recommendation**

2.1 That the report is received for information.

**3 Background**

3.1 Passenger Focus and London TravelWatch share the common objective for all transport companies to reduce the quantity of complaints from passengers and to improve the quality of operators' replies. As appeal bodies, neither Passenger Focus nor London TravelWatch investigates complaints until the operator in question has had an opportunity to resolve them directly with the complainant. Passenger Focus and London TravelWatch have an interest in transport operators giving good quality responses to passengers when dealing with initial complaints, to reduce the likelihood that they will become the subject of subsequent appeals.

3.2 To learn more about the way transport operators handle complaints, teams from Passenger Focus and London TravelWatch visit their customer services departments to obtain an overview of the style and content of correspondence sent to complainants. Such a visit was made recently to London Overground's customer relations offices in Swiss Cottage on 30 March 2010.

3.3 A report of the findings is attached as Appendix A.

**4 Equalities and inclusion implications**

4.1 Not directly applicable – report is for information only. Auditors do, however, highlight in their reports any issues of this nature emerging from their inspections, e.g. relating to font sizes used in correspondence or the availability of other (non-written) means of communication.

## **5 Legal powers**

- 5.1 Section 248 of the Greater London Authority Act 1999 places upon London TravelWatch (as the London Transport Users Committee) a duty to consider - and where it appears to the Committee to be desirable, to make recommendations with respect to - any matter affecting the functions of the Greater London Authority or Transport for London which relate to transport (other than of freight). Section 252A of the same Act (as amended by Schedule 6 of the Railways Act 2005) places a similar duty upon the Committee to keep under review matters affecting the interests of the public in relation to railway passenger and station services provided wholly or partly within the London railway area, and to make representations about them to such persons as it thinks appropriate.

## **6 Financial implications**

- 6.1 There are no direct financial implications for London TravelWatch arising from this report.

CONFIDENTIAL



London TravelWatch and Passenger Focus review of  
Complaints Handling within  
London Overground  
30 March 2010

Margaret Croucher, Vincent Stops & Kyle Yeldon

# Contents

---

	<b>Page</b>
1. Executive summary	3
2. Introduction	3
3. Methodology	3
4. Key Findings / Detailed Analysis	4
5. Conclusions	5
6. Recommendations	10
7. Circulation List	11

## **Appendices:**

- A. Assessment Quality Criteria

## 1. Introduction

---

London TravelWatch and Passenger Focus are aiming for all rail companies to improve the quality of responses to complaints and to reduce the causes of complaints by investigating and addressing underlying issues. Both organisations have therefore teamed up to undertake a programme to review complaint handling by train operating companies and the rail industry.

As appeal bodies we investigate complaints only after the operator in question has had the opportunity to resolve the complaint directly with the complainant. However the reviews will help us to learn more about the way complaints are handled and share best practice within the rail industry.

This report draws conclusions from the analysis of the closed cases randomly selected; reference to procedures, process and policies that support your complaint handling [passenger charter and complaint handling policy]; and from discussions with you.

## 2. Executive Summary

London Overground (LOROL) manages its complaints in-house through its customer relations team. We are able to identify some key issues which, if addressed, will help LOROL to improve the service it provides to customers.

We noted that LOROL demonstrated some very good practices in dealing with customer complaints. For instance there were some excellent, bespoke responses which were personalised to the individual customer's needs.

However, we feel that LOROL would be able to improve their customer service by the recommendations that can be found at the end of this report.

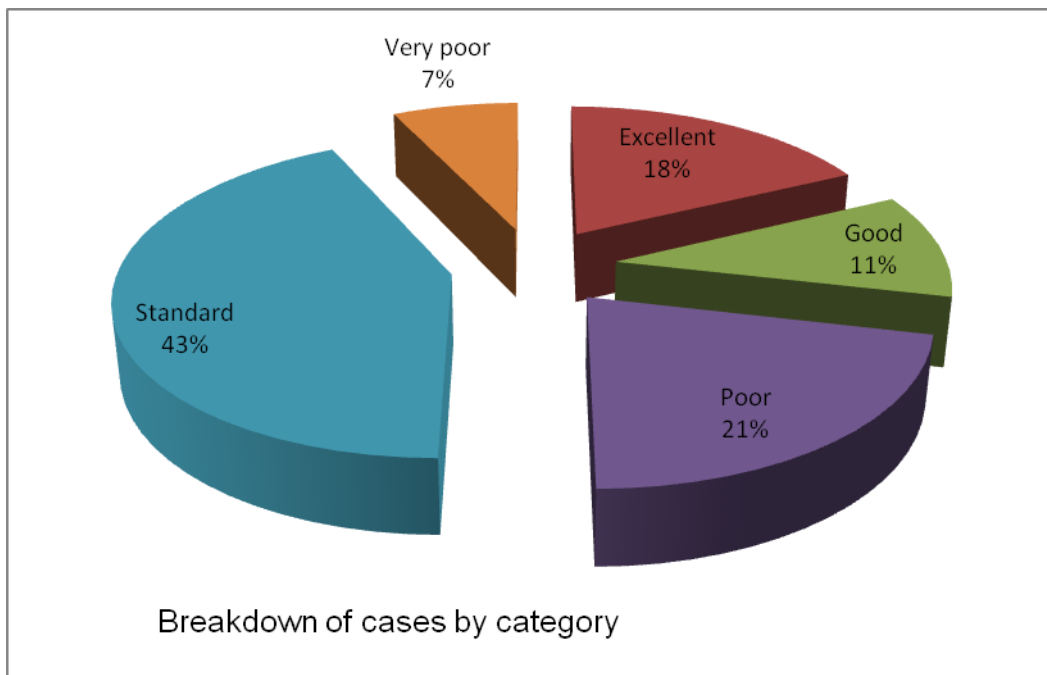
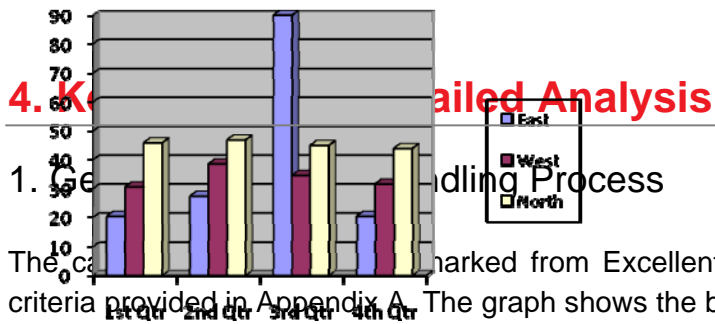
## 3. Methodology

---

The review was based on our standard approach. This involved randomly selecting 30 closed cases chosen on the day from a cross section of the subjects against which you report to the DfT covering up to a 12 month period.

The closed cases have been reviewed using the Assessment Criteria contained in Appendix A and the results recorded using the Tick sheets contained in Appendix B.

We have also reviewed and commented on your Passenger Charter; your Complaints Handling Procedure and your corporate customer service approach and policy as described in discussions during the review.



Of the 28 cases sampled, 43% were rated as standard, 11% rated as good, 18% as excellent, 21% was poor, and 7% as very poor.

Customer comments and complaints are a vital source of communication with any company. To provide excellent customer service a full reply or acknowledgement should be sent promptly. An excellent reply should include:

- evidence of an investigation
- evidence that the findings of the investigation had been used to benefit the company
- all points raised by the customer answered (this can be a standard or bespoke reply)
- an apology where appropriate

LOROL generally runs a good complaints handling service. Some responses were excellent, many good or standard. Only a few were poor.

Here are some examples of the cases we looked at:

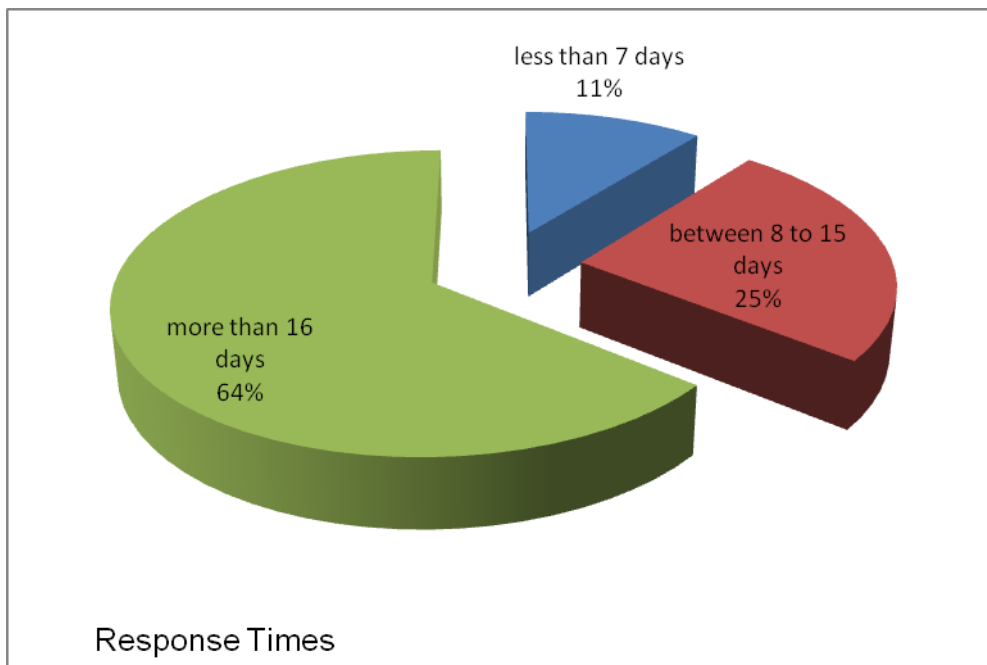
Excellent – Ms C (13914) – Info on trains/stations – lack of information during disruption between Kentish Town and South Acton – excellent personalised reply with plenty of detail, no quibble compensation & promise of future action.

Standard – Mr F (13560) – problems renewing his season ticket at Carpenders End because of the ticket machine. Mr F was assured that the money wouldn't be taken out of his account. Tried other stations, but they weren't able to help. Mr F had to use his savings to renew the season ticket, as the money had been put in a holding account. He asked for compensation, but was given vouchers. We felt that this form of compensation wasn't appropriate and that something other than money should've been offered.

Very Poor– Mr B (14534) – was travelling on a delayed train from Highbury & Islington to Hackney Wick. The reply refers to the wrong journey (refers to Willesdon Junction to Paddington).

## 2. Speed of response

In their Passengers Charter, London Overground commits to acknowledging 95% of correspondence received within one working day and to resolving issues raised within seven working days of the receipt of the letter or e-mail. However, in our sample, we found that only 11% of cases were resolved within this timeframe and that it took over 16 days for LOROL to respond in 64% of cases .



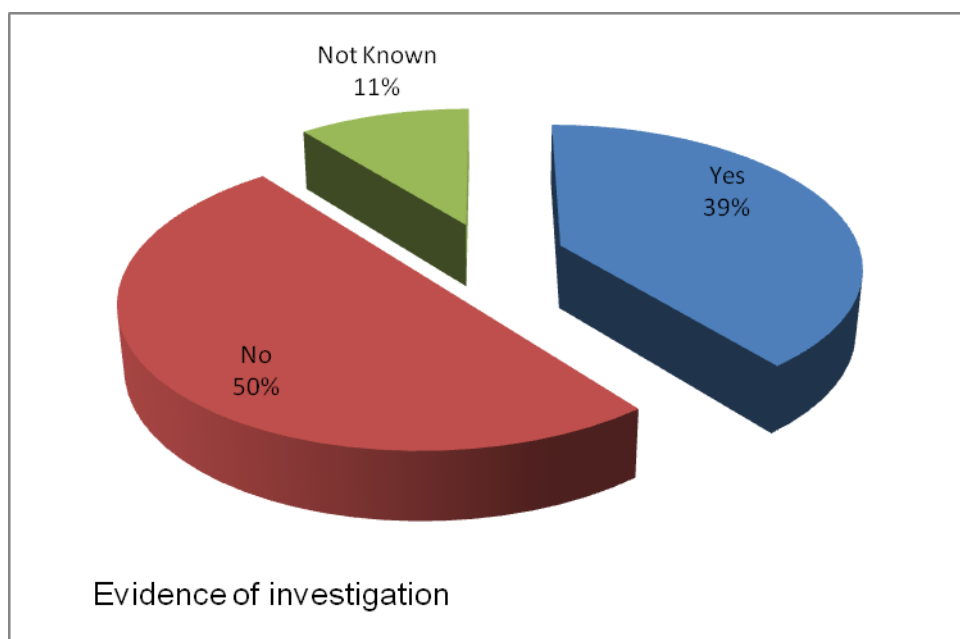
We understand there are incidents beyond London Overground's control that can cause a huge increase in their mailbag, so it is not always possible to provide full response as quickly as they would wish. However, we consider that where an issue is expected to take significantly longer than seven working days to resolve, good practice would suggest

providing some sort of update for the complainant. We recommend that a holding response is sent where a full reply within time is not possible.

This would avoid passengers feeling they were being ignored and contacting LOROL for a second time. An example of this is Mr C (13712 & 12702) who was complaining about the volume of the tannoy announcements at Dalston Kingsland. The first was given to a Customer Service Manager on 10 December, but not responded to until 1 February. The second was received by telephone on 23 December but not responded to until 1 February. Also, not certain if Mr C has received two replies to the same issue.

### 3. Evidence of investigation

When reviewing complaints we consider whether there is any evidence of the complaint having been investigated. Some cases will be straightforward, others will require an investigation – such as staff conduct issues, wrong information given, mechanical or service failure etc. and in such instances passengers have a reasonable expectation that they will be informed of the outcome of any investigation carried out.



We were concerned that 50% of the cases reviewed showed that there was no evidence of investigation. Although the majority of these would appear to be delay/repay contacts, we believe that nevertheless an explanation for the delay must be included.

A good example of when investigation has taken place is for Mr & Mrs I (14553) who were travelling from Willesdon Junction to Hackney Central. Their journey was disrupted and it took them 1 bus, 3 trains and a taxi to get home. The reply showed a lot empathy and information about the investigation that took place.

### 4. Evidence of issues being taken forward for improvement



Customer complaints should be used as free passenger feedback to draw attention to issues or areas for improvement. During our review of complaint handling we were keen to understand whether individual actions were taken on the back of complaints being raised.

We understand that, on the whole, complaints statistics can be used to identify trends in issues of customer concern. However, there are always instances where issues arise in individual complaints which should be followed up internally so that improvements can be made. Our review criteria therefore include a measure of whether there was evidence of the service provider taking on board the issues in the passenger's correspondence to improve its service.

However, we were concerned that 64% of the cases showed no evidence of the issue being taken forward for improvement, even if this was just in the form of management reporting. This would appear to show that the correspondence received isn't being used to the benefit of the company.

Having said that, a good example is Mr K (14796) who was going through zone 1 during the blockade between Gospel Oak and Stratford. All staff should've been aware that this was possible, and the reply says that the project manager for the engineering works has informed that "the station staff are going to receive another explanation".

## 5. Other issues and observations

### **Compensation**

LOROL is generally good at providing no quibble compensation for delay/repay. However, there are occasions when monetary compensation is not appropriate. Mr F (13560) – had problems renewing his season ticket at Carpenders End because of the ticket machine. Mr F was assured that the money wouldn't be taken out of his account. Tried other stations, but they weren't able to help. Mr F had to use his savings to renew the season ticket, as the money had been put in a holding account. He asked for compensation, but was given vouchers. We believe that this form of compensation wasn't appropriate and that something other than money should've been offered.

We also felt that it was wrong to provide compensation in the form of vouchers when money is lost in the ticket machine. For this type of loss, the compensation should be paid back by cheque.

### **Content of responses**

We found evidence of excellent responses which showed empathy, knowledge and gave a personal response. However, there were many that showed no evidence of personalisation or explanation. An example is Mrs O D (14185) whose journey from Camden Road to Lewisham was disrupted meaning she needed to travel from Camden Town via London Bridge which cost more. The reply gave an apology and compensation, but no explanation as to why she couldn't make her original journey.

We also noticed a number of spelling mistakes and typos. An example of this is in the opening paragraph of Mr G's (13790) reply. It says "h=are" instead of "are" Otherwise this was a good response. This is disappointing as it gives the passenger a poor impression of LOROL.

## **Policy & Procedure**

It is good practise that any correspondence that refers to another Train Company should be referred to them as quickly as possible. This wasn't the case when Mrs B (10983) had problems buying a ticket to travel from Lewisham to Greenhithe (not a LOROL route). While we appreciate that the reply was well meaning, by replying to her and giving compensation this could lead to complications in the future if Mrs B has reason to complain again.

We know other train companies have written into their Comments and Complaints Handling Procedure that:

If a comment received by us relates wholly to another Train Operating Company, Network Rail, or other part of the railway industry, we will pass on the comment to them and advise the customer within 5 working days that we have done so.

If this isn't part of LOROL's Comments and Complaints Handling Procedure, they may want to consider adding it as it provides excellent customer service to the customer.

## 5. Conclusions

---

We rated the overall review as “good”. We felt that there were cases that showed that when following good practice (investigating, giving personal and empathetic replies) that responses were of a standard that went beyond what would be expected by the passenger.

However, there were aspects of some responses that could have been better. These would be addressed if the recommendations we outline below are taken on board by LOROL

## 6. Recommendations

---

London TravelWatch and Passenger Focus would like to make the following recommendations. These are based on our findings and are intended to help improve the quality of LOROL customer services and complaint handling.

- Re-word the standard text, relating to staff complaints to show that some action has been taken although it may not be possible to reveal all the details. Maybe include something about training that the company already has in progress to provide good customer service. (see case 14694)
- If the results of the investigation are known they should be included in the response. (see case 14534)
- Where replies were scored as a good, an excellent could've been achieved if a follow up letter had been sent detailing the outcome on any investigation. (see case 14518)
- Where there is a serious incident/planned closures a standard reply could be produced in advance. This would mean that correspondence could be answered on the date of receipt rather than at a later date. It would give the complainant a better impression of LOROL and that their complaint was being taken seriously. It would also mean many responses could be filtered out and answered immediately instead of joining the queue. (see case 13980)
- There were a number of good bespoke responses, but proof reading/auditing would be helpful to avoid a number of spelling mistakes and typos. (see case 13790)
- It would be better if more replies could've been personalised (see case 13786)
- We felt that it was good that gestures of goodwill were given, but the reason why they were being given should be included in the response. (see case 13320)
- If there is likely to be a long delay in sending out the final reply, we felt that a holding letter/acknowledgement should be sent. This would prevent the complainant feeling that they were being ignored. (see case 14438)
- Comment Cards seem to be used for delay/repay claims. Maybe there should be a separate form for comments/complaints. (see case 14406)

## Appendix A

---

### ASSESSMENT QUALITY CRITERIA

#### **Introduction**

We know that a complaint is any expression of dissatisfaction about service delivery or about company or industry policy by a passenger or potential passenger. As a starting point all TOCs are obliged to apply the National Conditions of Carriage, Passenger Charter and their Complaints Handling procedures in setting out how they will deal with passenger complaints. Therefore this will guide our determination of a passenger's standard expectations.

In reviewing your complaint handling, we will be assessing how you have addressed passengers' complaints and correspondence by looking at a random sample of c40 of your closed cases. Our aim is to look at the response from the passenger's point of view and to make a judgement on whether it is likely to have met a passenger's reasonable expectations.

The assessment will, by its very nature involve a degree of subjective judgement as to what is good customer services and a good response. However the following sets out guideline criteria for our qualitative approach. We will also expect to continue developing the criteria as we gain more knowledge the more reviews we carry out.

#### **Quality Standards**

The quality scores that we will use are – Excellent, Good, Standard, Poor and Very poor. These scores will be applied to judge the overall letter and aspects of it such as -

- is the letter well written
- does it meet all the basics of good letter writing [e.g. in terms of spelling, grammar, addressing the passenger correctly];
- is each point answered;
- does the response demonstrate overall quality and good customer services (such as empathy; helpfulness; politeness);
- evidence the issue has been investigated or that the TOC has taken on board the passenger concerns.
- has the passengers reasonable expectations been met [e.g. apology, all issues answered, correct refund or ex-gratia payment made]

The following table captures some of the core elements of the basis for our quality assessment.

Excellent	Responses which are likely to exceed passenger's reasonable expectation.	<ol style="list-style-type: none"><li>1. Very prompt responses which seek to immediately resolve passengers complaints;</li><li>2. No quibble acceptance of passengers concerns with ex-gratia payment or gift in addition to any other compensation the passenger is entitled too.</li><li>3. Full and proper explanation in response to significant complaint for example to extreme incident of disruption.</li></ol>
-----------	--	--

Good	Response aims to address the passenger's complaint as well as satisfy the passenger's reasonable expectation of good customer service.	<ol style="list-style-type: none"> <li>1. Gives in-depth but succinct response which addresses the primary and any secondary issues;</li> <li>2. Confirms TOC investigation and or action to resolve complaint</li> <li>3. Offers apology and/or compensation</li> <li>4. Explains company policy but moderates it to suit context of passenger's issues.</li> <li>5. Response contains evidence of good customer services e.g. – fairness; empathy; polite; helpful; and understanding.</li> </ol>
Standard	Response aims to meet TOCs minimum obligations	<ol style="list-style-type: none"> <li>1. Response meets TOC minimum passenger charter promises and complaint handling procedures;</li> <li>2. Response addresses primary complaint with a basic response, likely to include standard paragraph;</li> <li>3. Explains context with a view to delivering a basic response to the passenger's concerns.</li> </ol>
Poor	Response fails to meet TOCs minimum obligations or address the passenger's basic expectations.	<ol style="list-style-type: none"> <li>1. Response fails to correctly identify or properly understand all or some of passenger's issues.</li> <li>2. Response reluctant to acknowledge passenger.</li> <li>3. Response is not clear e.g. either too long and confusing or too short and blunt; uses technical or industry jargon or hides behind company policy.</li> <li>4. Evidence of a lack of good customer service – e.g. is defensive; unhelpful; patronising; or contains platitudes without meaningfully addressing passenger's concerns.</li> <li>5. Refusing to give refund that passenger is entitled too or giving it begrudgingly, belatedly or only the bare minimum without taking account of all the circumstances</li> <li>6. No evidence of investigation</li> </ol>
Very Poor	Responses which are likely to frustrate and compound passenger's dissatisfaction.	<ol style="list-style-type: none"> <li>1. Very poor customer services for example – evidence of general bad faith towards the customer; lack of empathy; unhelpful;</li> <li>2. Spurious rejection of request for ex-gratia payments for consequential loss.</li> <li>3. Rejecting a passenger's entitlement to a refund in a manner which questions the passenger's good faith.</li> <li>4. Response which defaults to the National Conditions of Carriage to avoid using more favourable terms in the TOCs own Passenger Charter.</li> <li>5. A response which simply refers passengers to appeal to LTW or PF rather than making a real attempt to address the passengers concerns in the first instance.</li> </ol>



Name	Reference Number	Type	Category of issue	Summary of Case	Review Comments	Rating
Mr W	14694	web form	2. Staff Conduct/Availability	Mr W is fed up with the casual rudeness of ticket offices staff at Honor Oak Park. Often buys tickets on a Sunday and this behaviour is becoming routine	standard paragraph that gives no re-assurance of what has been done, only a promise of future action. Suggest that wording such as "filtered back" is changed to something like "I will let the Station Manager know". Could say that the comments will be used to improve quality	Standard
Mr G	ref no not given	email	11. NRES/Info Providers	there is no information on the LOROL website regarding travel service, including engineering work, between Barking & Gospel Oak	doesn't explain why the information has to be accessed through TfL, nor the reason why LOROL doesn't have this information on the dedicated website	Poor
Mr K	13797	email	2. Staff Conduct/Availability	Wanted to travel from Hatch End to Euston. There was a lot of snow, which meant there were cancellations. The member of staff was unable/unwilling to help and didn't have a good command of the English Language. He couldn't understand the problems. All made a bad situation worse	reply gives a promise of future action that will be taken, not what has been done. Feel that the delay in replying has meant that the quality of the reply has been affected. As such the passenger feels fobbed off	Standard
Mr F	13560	email	3. Fares & Retailing	Wanted to renew his season ticket at Carpenders Park. There were problems with the ticket machine and the ticket wasn't issued. After 30 minutes, the ticket clerk & his colleagues assured Mr F that the money would be put back into his account, but suggested that he tried another station. Mr F tried 2 other stations, but they weren't able to help. Because of the problem he found that his credit had been used up, so was unable to do other shopping. Had to use his savings to renew his season ticket. On other occasions there have been cancellations. Asked for compensation.	type of compensation in the form of vouchers is inappropriate given the stress of the situation and experience. Feel that it would be more appropriate to give something other than money, eg. Hamper or High Street vouchers	Standard



Mr C	14278	email	3. Fares & Retailing	Oyster charged £11 for 3 bus journeys & 1 train journey when travelling from Silver Street to Enfield Town. Swiped the card at Enfield - made a strange beep, but didn't get the opportunity to check it as there were a lot of other people.	delay in referral to Oyster	Standard
Ms A	14497	email	1. Train Service Performance	enquiry about replacement buses & going through zone 1 when travelling from Stratford to Highbury & Islington Monday to Friday	standard reply sent	Standard
Miss G	13986	email	2. Staff Conduct/Availability 1. Train Service Performance	website didn't show that there was a replacement bus service from West Hampstead to Richmond. Had to wait for 25 minutes for a replacement bus. The bus journey was very slow to Gunnersbury and the driver didn't announce the station stops.	missed points about the quality of the bus and it's driver. Reply was mostly about engineering work & that compensation isn't generally given in these circumstances	Poor
Mr F	13786	email	2. Staff Conduct/Availability	member of ticket office staff was reading a newspaper and wasn't wearing a name badge. When Mr F was being served by his colleague, it was difficult for the person to hear Mr F because the first member of staff was also talking loudly	reply gives a promise of future action that will be taken, not what has been done.	Standard
Mr G	13138	complaint	1. Train Service Performance	29.12.09 - 11.1.10 & 19.12 - delays because of the snow, 4.1.10 - cancellation due to engineering works	brief, no explanation of delays, standard reply	Standard
Mrs O D	14185	complaint form	1. Train Service Performance	wanted to travel from Camden Road to Lewisham. Unable to travel from Camden Road. Had to go from Camden Town, via London Bridge. This cost more money than the original journey would've cost	reply didn't say why the train from Camden Road had been cancelled	Standard
Mr L	no ref number given	email	3. Fares & Retailing	Doesn't feel that the new fares structure is fair and wanted to know how LOROL could justify increasing the cost of his ticket by 47%	reply is incomplete and confusing though well meaning. Feel that answer could've been found from TfL as the reply could have been informative without needing to refer it. Need to make sure that TfL has replied to Mr L	Poor
Ms C	13914	phone	4. Information on Trains and Stations	lack of information at station during disruption when travelling from Kentish Town West to South Acton	response sent by Dawn Kolokotroni	Excellent

Mr & Mrs I	14553	letter	1. Train Service Performance	Travelling from Willesden Junction to Hackney Central. Found that there were no trains at 22.20. It took 1 bus and 3 trains to get home	bespoke, sympathetic response - no quibble gesture of goodwill given. The only issue was a typing error.	Excellent
Mr S	14411	complaint form	3. Fares & Retailing	lost £10 in the ticket machine at Upper Holloway	good answer. Feel that travel vouchers shouldn't be given when money has been lost	Excellent
Mrs B	10983	letter	3. Fares & Retailing	wanted to travel from Lewisham to Greenhithe. Had to wait for a long time in a queue and then ask 3 times for a ticket	don't understand why LOROL replied to this complaint as it should've been passed to Southeastern. While I'm sure that Mrs B will appreciate the voucher, it could lead to confusion in the future.	Very Poor
Mrs S	14469	complaint form	1. Train Service Performance	As there was a replacement bus service, the journey from Kensington Olympia to Watford Junction took 3 hours	concerned that the comments form was lost. There appears to have been no investigation to find out if 3 hours was excessive for the journey and if it was, then the reason hasn't been given.	Poor
Miss L	13081	complaint form	1. Train Service Performance 2. Staff Conduct/Availability 4. Information on Trains and Stations	wanted to travel from Leyton Midland Road to Harringham Green Lanes on 4.1.10. Had checked the website which advertised there were only minor delays. Arriving at Leyton Midland Road, there were no trains, staff or information.	standard paragraph only refers to one point, all others are missed. No reason given as to why £4 has been sent	Poor
Jo Hendry on behalf of Mr C	13712	verbal to CSM - East	4. Information on Trains and Stations	would like the volume of the tannoy announcements at Dalston Kingsland turned down	good answer	Good
Mr C	12702	phone	4. Information on Trains and Stations	possible dup of the above, but a telephone call from Mr C direct	uncertain if a separate reply has been sent	
Mr R	14518	complaint form	4. Information on Trains and Stations	Service from Euston to Carpenders Park were suspended. Wanted to use the replacement bus service. On 22.1 there was no sign of the bus. Found that the bus had called at the front of the station. Wasn't told that he was waiting in the wrong place.	no quibble gesture of goodwill	Good

Mr K	14796	email	1. Train Service Performance 2. Staff Conduct/Availability	1st contact - wanted information about going through zone 1 during the blockade between Gospel Oak & Stratford. 2nd contact - staff at Camden Town were unaware that they should allow passengers with zone 2-6 travelcards to travel through zone 1 during the blockade.	good replies	Good
Mr G	13790	email	7. Timetable and connectional issues	Complained that during the Christmas blockade there was no replacement bus service at Caledonian & Barnsbury. Wanted to know what plans there were for replacement bus services during the Gospel Oak/Stratford blockade	polite, informative, empathetic, but has typing errors	Excellent
Sean	13980	phone	3. Fares & Retailing	charged to go through zone 1 during the Gospel Oak/Stratford blockade	informative, detailed reply, but wondered why this case was answered by email when it could've been answered during the telephone call	Excellent
Miss T	14531	complaint form	3. Fares & Retailing	at Dalston Kingsland was unable to swipe out with his Oyster due to a power cut	could've given more details to the extent of the power cut	Standard
Mr K	14406	complaint form	1. Train Service Performance	travelling from Walthamstow Queens Road to Gospel Oak - train left early	standard paragraph used	Standard
Mr A	14438	complaint form	3. Fares & Retailing	Couldn't top up his Oyster, but the machine took his £20 note	sent vouchers instead of a cheque	Standard
Mr Benson	14534	complaint form	1. Train Service Performance 4. Information on Trains and stations	travelling from Highbury & Islington to Hackney Wick. Train was delayed, no information given on train	reply refers to another case, wrong stations mentioned. No investigation appears to have taken place	Very Poor
Miss Trenter	13242	complaint form	1. Train Service Performance	travelling from Shepherds Bush to Clapham Junction - train left early	misunderstand comments as it looks as if Miss T was not delayed, but other passengers. Commitment to future action only. Would've expected some investigation to determine whether or not the train left early	Poor