

Complaints procedure



NORTHERN

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1.0 Introduction

Welcome to the Northern network, run by DFT OLR Holdings Limited (DOHL). At Northern we are passionate about making sure your journey with us is as good as it can be. Customer satisfaction is one of our top priorities and we're committed to consistently providing a safe, reliable, and welcoming service on every one of those journeys.

But we know that despite our best efforts there are times when things don't go to plan. If this happens and you're not happy with the service you've received then let us know. It's important to us that where possible we resolve any issues you've encountered. Your feedback also helps to drive improvement across the company and influences the training we provide our people.

We believe that it is good practice for continual improvement that management information and insight from complaints is used to identify systemic and recurring problems to indicate areas where we can improve services.

We define a complaint as "Any expression of dissatisfaction by a customer or potential customer about service delivery or company or industry policy where a response or resolution is explicitly or implicitly expected."

Although all expressions of dissatisfaction are deserving of a response, we recognise that a distinction should be drawn between a complaint and feedback, to establish clarity around what is within scope of this Complaints Handling Procedure.

Feedback can take the form of comments which are neutral, positive or negative, about services, without necessarily requiring corrective action, change of services or formal review of a decision unless the contact received the response or resolution is explicitly or implicitly expected.

1.1 How we gather feedback

We gather feedback through:

- ◆ Analysis of social media.
- ◆ Industry survey's conduct by Transport Focus and the Office of Rail and Road
- ◆ Online forums and consumer websites.
- ◆ Post-travel surveys sent to our customers
- ◆ Relationship surveys sent to our customers
- ◆ Post-contact surveys with the customer relations team
- ◆ Through our customer and stakeholder engagement strategy
- ◆ By listening to what our staff and customers tell us.

The Head of Customer Experience is responsible for monitoring feedback as this also:

- ◆ May adversely affect our reputation;
- ◆ Provides insight, influencing future service and delivery methods.
- ◆ Supports Training and development
- ◆ Improves record keeping
- ◆ Improves quality controls
- ◆ Identification of systemic weakness
- ◆ Complaint handling service standards

Where we feel the feedback, or the contact received could be characterised as a complaint we will channel the customer to use the formal complaints procedure:

Feedback provided to front line team members

If the feedback is made to a member of front line staff at stations or on one of our trains they will try to resolve the issue raised and then, should the customer still be aggrieved or need to contact our customer experience team, they will direct the customer to contact the customer experience centre or appropriate section of the website.

Feedback provided to our social media team

If the feedback is provided to our social media team, our social media advisors will try to resolve the issue initially and then, should the customer still be aggrieved or need to contact our customer experience team, they will direct the customer to contact the customer experience centre or appropriate section of the website.

Feedback provided by other channels

Our customer relations team will ensure that any feedback we receive regardless of how you contact us, is recorded in the customer relations management system and details of the feedback are passed to the relevant manager or business owner for consideration and review. Where we can make changes as the result of the feedback we've received we will notify you of the changes we have made or plan to make soon because of your feedback.

2.0 How to make a complaint

Customers are at the heart of all that we do. However, sometimes, things go wrong and we don't give the levels of service that customers expect. By monitoring and responding to complaints we can improve our service and improve our reputation by providing the levels of service that customers want and expect.

Talk to one of our frontline team members

If you're travelling on one of our trains or at one of our stations and have a complaint, question or issue please talk to one of our employees. They will be happy to help you and will try to resolve your issue there and then. Depending on the severity of the issue they may need to involve their supervisor or appropriate manager if available. If this is not possible, or if you would like to take the matter further, they will be able to provide you with the contact details of our Customer Relations team.

Contact our Customer Relations Team

Our Customer Relations team are available 6am to 11pm, 7 days a week except Christmas Day and Boxing Day. If a complaint is raised via any channel, this will be fully recorded in our customer relations database. Their role is to help answer questions and resolve any issues you've had with our services.

You can contact them in the way that suits you best:

Telephone: **0800 200 60 60**

Textphone: **0800 200 60 60**

Email: **Complaints@Northernrailway.co.uk**

Website: **<https://northernrailway.force.com/s/contactsupport>**

Write to us at:

**FREEPOST
NORTHERNRAILWAY**

Social media: We have a social media policy that is included on the website. Although we monitor social media to drive ongoing service improvements, we do not recognise social media as a forum for complaints. Complainants are directed to the web page to make a formal complaint and will be made aware of our Complaints Handling Procedure.

2.1 What to include in your complaint

However, you contact us, to help us fully answer your complaint and respond to you promptly please make sure you include the following:

- ◆ Your full name and address including postcode
- ◆ A daytime telephone number with your correspondence, as we often find that a telephone conversation is much more effective than lengthy correspondence
- ◆ Ideally an email address as this is often quicker to reach you than post
- ◆ If you are making a complaint about a journey or station please include information about which of our services you were using, such as the date and time of your journey, where you started, changed trains and completed your journey
- ◆ Images of your tickets or a copy or scan of them including any receipts of additional expenses
- ◆ Your reason for complaint including a description of the problem and the inconvenience caused and how you would like us to resolve the issue

2.2 We may need to request further information to resolve your complaint

In some circumstances we may require further information from you to resolve your complaint, if we need to do this we will email, write or telephone you depending on your chosen method of contact. If we do not receive a response from you after 10 working days then we will close your complaint and then contact you again to make you aware of the process of how you can re-open the complaint by providing the additional information we have requested.

2.3 How we will respond to your complaint and how quickly

All complaints, irrespective of how you contacted us, are entered into our Customer Relations Management database and we will provide you with a unique case reference to your complaint, we will do this verbally over the telephone if you call us and electronically by email if you email us or complete one of our online forms.

You can be confident that we take your complaints seriously and that they will be handled fairly. All issues raised will be carefully considered, investigated and examined with your view in mind. Once this is complete, we will let you know what happened, why, who was responsible and what

the outcome is. We will provide an appropriate response to all the points you raise. If we've got it wrong we'll let you know and we'll work hard to prevent the same issue happening again.

To answer your questions fully and fairly we may have to carry out an investigation with our management team. If this is going to take longer than our target response time, which it sometimes can do, we'll let you know as soon as possible and tell you when to expect to hear from us. While complaints about our people will be fully and fairly investigated, we cannot tell you of any specific actions we have taken with a particular individual.

Once we have completed our investigation we will provide you with a full written response. We'll also ensure the points that you make are raised with the relevant managers to prevent the same mistakes from happening again.

Target Response Times

Telephone:

- ◆ We aim to answer all telephone calls within 30 seconds sometimes this is not possible especially during periods of disruption to the rail network. Our telephone system will notify you of the wait time and your position in the call queue.
- ◆ We will attempt to resolve your complaint over the telephone and if that's not possible we will call you back or write to you within 10 working days of your initial contact.
- ◆ If the complaint is complex and requires further investigation we will call you back or write to you within 20 working days.
- ◆ Where the complaint cannot be resolved within our 10-working day target we will keep you updated on the progress of your complaint and when you can expect a resolution.

Email / Webform:

- ◆ Our customer relations management system will acknowledge your complaint within 2 hours of your submission and provide an acknowledgement email with your unique complaint reference
- ◆ We aim to respond to all email and webform contacts within 48 hours, during busy periods this may not be possible and where we fail to respond within 48 hours we will email you to apologise and update you on when you can expect to receive a response from us.
- ◆ We aim to resolve all the complaints we receive within 10 working days or sooner if this is possible, however if the complaint is complex and requires further investigation we will ensure a response is provided within 20 working days.
- ◆ Where the complaint cannot be resolved within our 10-working day target we will keep you updated on the progress of your complaint and when you can expect a resolution.

By Post

- ◆ We aim to resolve all postal complaints we receive within 10 working days of receipt or sooner if this is possible, however if the complaint is complex and requires further investigation we will ensure a response is provided within 20 working days.
- ◆ Where the complaint cannot be resolved within our 10-working day target we will keep you updated on the progress of your complaint and when you can expect a resolution.

If we receive a sudden or unexpectedly large increase in the volume of complaints we may not be able to meet the 20 working day timescales but we will use all reasonable endeavours to do so. In this case we will inform ORR and put a message on the complaints page of our website and telephone system. This message will include: the reason why normal standards cannot be achieved; expected duration of the emergency timescales; plans in place to remedy the situation; and procedures to ensure the quality of responses is maintained.

2.4 The types of compensation you may be entitled to

Where appropriate we will provide compensation. Our Passenger's Charter explains our compensation and refund policy should your train be cancelled or delayed or if you are unable to travel. It is available on our website

<https://www.northernrailway.co.uk/sites/default/files/2022-11/Passengers%27%20Charter%20booklet%202022%20FINAL.pdf> and from all our manned stations.

Using our Delay Repay scheme, explained in the charter, you can claim if you're delayed by 15 minutes or more when you travel with us. If you contact Northern customer services about a complaint and have not applied for Delay Repay compensation we will make you aware of your entitlement. Our Delay Repay scheme and the Industry Arrangements set out in the National Rail Conditions of Travel do not stop you using your other rights, like those under the Consumer Rights Act, to claim compensation or losses. You can find out more about how the Consumer Rights Act applies to our services at: **<https://www.nationalrail.co.uk/CRACustomerFAQs.pdf>**

If you chose not to travel due to a cancellation or delays to our service you are able to claim a free refund from the ticket retailer for more information on your rights to a refund and compensation can be found here

<https://www.nationalrail.co.uk/National%20Rail%20Conditions%20of%20Travel.pdf>

Claims for Losses, Property Damage or Personal Injury. If you wish to make a claim against Northern for loss, property damage or personal injury this can be made by telephone, in writing by email or letter to our Customer Relations team giving as much detail as possible about your claim. We'll investigate your claim and respond to you in 10 working days. If you report an accident or injury, this will be treated as a priority and allocated to one of our Customer relation supervisors to ensure any appropriate immediate actions are taken. Your report will be logged in our accident reporting database and if appropriate we will also report the matter to the Office of Rail and Road as required by the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). Any claims will be dealt with in accordance with the Claims Allocation and Handling Agreement (CAHA) which governs all rail industry compensation claims. caharegistrar.wordpress.com

Failed assistance, Customers who have pre-booked travel assistance with us, can claim compensation for any assisted travel failures via our passenger assistance re-dress scheme by writing to us at **Freepost Northernrailway**, calling us on **0800 200 60 60** or emailing us at **Enquiries@Northernrailway.co.uk** with the details of the failure and your assisted travel booking reference.

3.0 If you are not satisfied with our reply

We always try to address all the points you raise in your complaint in our first reply. However, if you're unhappy with our response please let us know and we'll ensure that one of our Customer Relations Supervisors review your case and the response we have provided and your specific concerns.

They will take ownership of your complaint and respond to you. All second substantive responses are reviewed by our quality assurance team to ensure any learnings are shared with the wider customer relations team and the staff members involved in dealing with your complaint.

We'll do our best to resolve any problems you've had with Northern in a fair and reasonable way. Please give us the opportunity to try to resolve your complaint. If you're unhappy with the response you receive, you have the right to appeal to the Rail Ombudsman and if we reach this point in the complaints process, we will issue you with a deadlock letter.

3.1 Our escalation process

Complaints will be escalated for many reasons. The following, non-exhaustive list is a guide:

- ◆ If a complainant requests escalation
- ◆ Where there is an allegation of fraud
- ◆ If the complainant is particularly aggrieved
- ◆ If the complainant is not satisfied with the initial response received
- ◆ Where there may have been a safety breach or near miss
- ◆ Where there is an allegation of illegal behaviour
- ◆ Where a customer has suffered physical harm
- ◆ Where there is a serious risk to the reputation of the company;
- ◆ Where there is an allegation of gross misconduct;
- ◆ if the complaint is unusual; or if there has been an unexplained series of similar complaints

Our Customer Relations team are trained to recognise when a complaint should be escalated and will:

- ◆ Escalate to the Customer Relations Supervisor and they will take ownership of the complaint and co-ordinate a response. Complaints of a serious nature will be escalated to the Customer Relations Manager for review

- ◆ The Customer Relations Manager will review the complaint and take ownership and respond to any complaints escalated by the Customer Relations Supervisor.
- ◆ The Customer Relations Manager will escalate complaints to the Customer Experience Centre Operations Manager, who will liaise with the Head of Customer experience and advise the appropriate senior director of the complaint and take ownership to ensure resolution.
- ◆ In cases relating to fraud the investigation will be handled by our debt recovery and prosecution unit and subject to criminal prosecution.

3.2 Rail Ombudsman

The Rail Ombudsman is there to help resolve on going complaints between us and our passengers. It's free to use their services and they are independent of the rail industry. They don't take sides, but just look at the evidence available. They will help us both to try to reach an agreement, but if this doesn't happen, they will decide the outcome based on the evidence they've received. If you agree with their decision, then we must act on what they say.

You can appeal to the Rail Ombudsman if:

- ◆ You're unhappy with our final response to your complaint which will be contained in a letter or email known as a deadlock letter, directing you to the Ombudsman service
- ◆ We haven't resolved your complaint within 40 working days of receiving it, we will automatically issue you with a deadlock letter
- ◆ No more than 12 months have passed since we sent you our final response.
- ◆ There are some complaints that the Rail Ombudsman won't be able to consider, for example if it's about the way one of our services have been designed or industry policy
- ◆ If that's the case, then they'll contact you to let you know. If possible, they will transfer your complaint to another organisation that may be able to help you further, such as Transport Focus the independent consumer watchdog for the rail industry. They will independently review your complaint and where appropriate, follow things up on your behalf.

How to contact the Rail Ombudsman

Post:

The Rail Ombudsman FREEPOST – RAIL OMBUDSMAN

Telephone: **0330 094 0362**

Textphone: **0330 094 0363**

Email: **info@railombudsman.org**

Website: **www.railombudsman.org**

Twitter: **[@RailOmbudsman](https://twitter.com/RailOmbudsman)**

3.3 Complaint Ownership

In line with industry guidelines:

- ◆ If your issue is with another train operating company but you send it to us, we will forward your complaint to a contact at that company. We'll also let you know when we've done this and to who we've sent your complaint.
- ◆ If your journey involved multiple trips on different services we will answer any issues that relate to our services and forward your details to the other relevant train operating companies so they can respond directly to you about their portion of your journey.
- ◆ If your complaint is about a ticket or service provided by a third-party ticket retailer please contact them directly.
- ◆ If your complaint is about the rail infrastructure e.g. level crossings or fences please contact Network Rail.
- ◆ Where the complaint is about one of our third-party suppliers we will own the complaint and work with the supplier to coordinate a response.
- ◆ For complaints about multi-modal travel where the substance of the complaint does not fall within the ownership of the Northern trains, where possible to we will direct you to the appropriate organisation where they can raise your complaint.
- ◆ Please note we cannot intervene on your behalf regarding appeals to the Independent appeals assessors:

Penalty Fares:

Web: <https://www.appealservice.co.uk/NewAppeal>

Post

Penalty Services
PO Box 1258
KING'S LYNN
PE30 9GJ

Parking fines, appeals and responses relating to travel incident reports that are managed by our debt recovery and prosecution unit should be directed to:

Parking Fines

Email: PPN.DISPUTES@Northernrailway.co.uk

Telephone: **0844 848 2571**

Post:

Northern Trains Limited
Debt Recovery and Prosecutions Unit
FREEPOST NEA3188
BRADFORD
BD1 1BR

Travel Incident Reports / Unpaid Fares Notice's

Email: DRPU@Northernrailway.co.uk

Telephone: **01904 568 181**

Post:

Northern Trains Limited
Debt Recovery and Prosecutions Unit
FREEPOST NEA3188
BRADFORD
BD1 1BR

If your complaint is about the service that the Penalty Services, Debt Recovery and Prosecution unit have provided, or the conduct of Northern Revenue Protection Staff please contact us.

4.0 Privacy and Security

Northern is committed to protecting and respecting your privacy when you use our services. We apply appropriate administrative, technical and organisational security measures to protect your personal data that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal.

All the information you provide to us is stored on secure servers. Northern trains our employees on all data privacy policies and procedures and only permit authorised employees to access personal data on a need to know basis, as required for their role. We also take steps to ensure that any service provider that we engage with to process personal data on our behalf takes the appropriate technical and organisational measures to safeguard personal data.

Personal details we hold:

We may hold your name, address, email address, phone number, our correspondence with you, the compensation claims you have made and the payment made by us, proof of journey or other supporting information you may provide.

To ensure that we have an accurate record of dealings between us (and for training purposes) we may, in certain circumstances, record or monitor telephone calls, however you will always be told when this happens. All call recordings are held for a period of 12 weeks, electronic copies of correspondence and emails are held for a period of 5 years.

How we use your personal data

This information is only used for administration of correspondence or processing claims you have made and fraud prevention purposes.

Sharing data with third parties

We may share your correspondence with the Rail Ombudsman, if you have asked them to act on your behalf under a complaints handling procedure. Requests from Transport Focus and London Travel Watch, or a third-party intermediary (e.g. Resolver) are dealt with on a case-by-case basis to ensure that any such disclosure is lawful in accordance with the General Data Protection Legislation.

We may also share information with other train operating companies for fraud prevention. We will only do this where there is a formal data sharing agreement in place. Our privacy policy, is available on our website <https://www.northernrailway.co.uk/legal/privacy-policy>

We will also share data with the nominated research provider who perform complaint handling surveys on behalf of the Office of Rail Road, this is to assess our effectiveness and your satisfaction with the complaints handling process and the resolution we have offered.

We provide the following information for them to conduct the survey:

- ◆ The email address you used to contact us
- ◆ The date your complaint was opened
- ◆ The date your complaint was resolved
- ◆ The reason you contacted us to complain
- ◆ If the complaint was escalated to the Rail Ombudsman

The current provider of this service is <https://melresearch.co.uk/>, If you don't wish to be part of this process then you can opt out by emailing enquiries@Northernrailway.co.uk.

4.1 Respecting equality and diversity

It is essential that no one is excluded from lodging a complaint. We make it easy for all our customers to provide feedback, considering the specific needs of all individuals including those with different types of disabilities. We provide a range of means to contact us (see above). We work with charities to provide training for frontline staff in recognising the needs of customers with specific disabilities. Where possible we will provide complaints information and responses in accessible formats, depending on customers' particular needs. We will exploit new technologies and systems to help us do this.

Our customer relationship management system (CRM) will allow us to recognise repeat customers who contact the customer experience centre and to respond to their specific needs accordingly. Carers, support workers and guardians are able to act/advocate on behalf of a passenger with the passenger's permission/authority (subject to the data protection and Northern privacy policies).

4.2 Frivolous vexatious or abusive complaints

Our people will always treat you respectfully and with courtesy but we may decide to terminate correspondence before full resolution is reached if we consider the complaint to be frivolous or if despite our best efforts, it's clear we are unlikely to satisfy you. If a complaint contains abusive language or is aggressive in tone whether in person, on the phone or in correspondence by any channel, we will reply, but will advise you in our response that this is unacceptable and that we will terminate any further correspondence with you if it continues.

The decision to terminate correspondence will be taken by the Customer Experience Centre Operations manager in conjunction with the Head of Customer Experience and the reasons for the decision will be recorded in our Customer Relations Management System. The Customer Experience Centre Operations Manager will also consult the relevant passenger bodies. We will advise you of our decision including the reason why and provide you with the contact details of the passenger watchdogs and our alternative dispute resolution provider should you wish to take the matter further.

5.0 Our customer relations team

Our complaints handling process at Northern is managed by a Customer Experience Centre Operation Manager, who reports to the Head of Customer Experience. This role oversees the whole Customer Relations team and ensures all passenger complaints are handled fairly and efficiently and that customer feedback is acted upon.

5.1 Training and Quality Assurance

All of our customer facing team members, including those not directly employed by us such as sub-contractors and agency employees, are trained to help our passengers. Our in-house customer relations team are UK based. They answer telephone calls and correspondence, including compensation and refunds. We are committed to ensuring that all of Customer Relations team, have the knowledge and skills to deal with a complaint about our services.

All members of our team are recruited following a rigorous customer centric selection process and are trained in customer service and complaints handling. Performance management and quality monitoring processes ensure that all team members provide consistently high-quality responses.

Each period every team member from customer relations has their work sampled to monitor the quality of response. Our Customer Relations Managers and quality assurance team also carry out regular team briefing's and refresher training to ensure standards are maintained and any training needs addressed.

5.2 Monitoring our performance and driving improvements

Data from our Customer Relations Management System is vital in providing insight into the customer experience. We use this data along with information from across our business to address the root causes of dissatisfaction and help drive continuous improvement. We review all complaints and feedback we receive. This includes monitoring the volume and reason for complaints as well as analysing the underlying cause and trends. Results are regularly reviewed at all levels of the business from a weekly highlights report to detailed analysis.

These are considered at board and executive level on a monthly basis and drive our customer service strategy and our strategic planning process. We will provide a periodic reports to ORR and publish a Customer Report each quarter on our website that includes:

Total number of complaints

Percentage of complaint cases responded to including:

- a) Percentage of complaints responded to within 20 working days
- b) Percentage of complaints responded to within 10 working days
- c) Percentage of complaints responded to within Three working days
- d) Percentage of complaints responded to by contact method e.g. phone, email, letter, etc.
- e) Average Response time for responding to complaints

Total number of complaints received by complaint category

Complaints about the complaint handling process:

- a) response time
- b) type/level of compensation
- c) complaints not fully addressed / fulfilled by us
- d) no response from us
- e) we were impolite/unhelpful
- f) complaint not received g) other 5. '

Frivolous and vexatious' complaint volumes (and narrative)

Additionally, we provide a narrative annually to ORR on how we are measuring continuous improvement in complaints handling and how we are using complaints to improve the business.