

COMPLAINTS HANDLING PROCEDURE

JUNE 2025

WELCOME TO LUMO

Welcome to Lumo, your innovative rail service linking the iconic cities of Edinburgh, Newcastle and London. Our aim is to reimagine rail and to create a new way to travel for our customers that is better value, kinder to the environment and as time effective as taking a domestic flight. We aim to be more than just a “rail service”, we want to change and update many of the historic practices within the rail industry and adopt new technology in order to drive the highest levels of customer satisfaction and colleague engagement.

We’re committed to consistently delivering excellent service and making journeys easy and convenient for all our customers. We know that sometimes things can go wrong, or we can do things differently and we'd like you to tell us when this happens.

Continuous improvement is important to us and our vision and value to challenge ourselves, always learning and improving, means we’re able to quickly and effectively implement change based on our customer feedback. We use this to drive improvement by:

- Identifying trends and issues.
- Understanding and reviewing root causes.
- Assessing and making changes to the way we work to continually improve our services, including systematic solutions.
- Reviewing how we respond to feedback and how we can improve in doing so further.

This is our Complaints Handling Procedure which explains how you can give feedback or make a complaint and how we will handle it. You’ll find out what to expect from us when getting in touch and what we do with your information. We aim to resolve individual complaints promptly and fairly.

The National Rail Conditions of Travel also details your entitlements if the service is not to the standard you expect. These are available online at [National Rail Conditions of Travel 2024.pdf](#)



We have written this document in line with the Office of Rail and Road's (ORR) Guidance on complaints handling procedure "improving the passengers' experience" which can be found <https://www.orr.gov.uk/sites/default/files/2023-02/final-complaints-code-of-practice-clean.pdf>, as well as incorporating elements of good practice from the proposed new Complaints Code of Practice. For clarity and consistency, we use the ORR definition of 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'

CONTENTS

How to give us feedback or make a complaint.....	2
What to expect from us	7
Taking your complaint further	11
Your privacy and the Data Protection Act	143
How we use complaints data	154

HOW TO GIVE US FEEDBACK OR MAKE A COMPLAINT

We welcome all your feedback and insight as a valuable opportunity to learn and help us to be better at what we do, with a key focus on safety related issues, as well as accessibility complaints. We want to make it easy for you to contact us, so this document shows how you can get in touch with us in a variety of ways.

TALK TO OUR ONBOARD COLLEAGUES

Our colleagues are trained to handle complaints fairly and efficiently. They are empowered to solve problems there and then. Our Customer Experience Ambassadors will do their best to help you, so please speak to them directly or they may use one of our digital communication tools if you are a British Sign Language user.

If your concern cannot be resolved on the spot, or it involves one of our colleagues and will require investigation with regards to what has happened, we will either direct you to our dedicated webpage or give you the contact details of our Customer Experience team.

ON OUR WEBSITE

You can easily make a complaint on our dedicated webpage at www.railhelp.co.uk/lumo

This webpage will allow you to select which type of feedback or complaint you want to give. We clearly indicate what details are required or useful for each contact type. At the end of the process, you will receive a notification from us on your preferred channel, acknowledging your contact.



You can also check out our Frequently Asked Questions on our website <https://www.lumo.co.uk/help> which can assist you with most queries and is there to help you resolve any concerns. This page is regularly updated.

Additional information on our policies, service commitments and the layout of our trains can be found <https://www.lumo.co.uk/help> on our website too.

ON OUR APP

You can easily contact us and give us feedback using our app where you can share your experience with us. Our Customer Experience team will acknowledge your contact and follow up with you. Our app is available by searching for <https://www.lumo.co.uk/onboard/introducing-lumogo> in your phone's app store.

GET IN TOUCH WITH OUR SOCIAL MEDIA TEAM

We are a digital oriented business and understand that you may sometimes need an answer to your question as soon as possible. You can contact us when best suits you on Social Media, where our Social Media Team will be available to help between 06.00 – 22.00 7 days a week.

The team can help you with any question, concern or feedback that you have. If your question or concern is complex, we may ask you to contact our Customer Experience team, as they may be better placed to resolve it. When you contact us on Social Media and we believe that your matter should be investigated as an official complaint, we will advise you how you can do this.

You can contact our Social Media Team between 06:00-22:00 7 days a week via:

- 'X' : @LumoTravel
- WhatsApp: 07816 123149

We will not discuss complaints about our colleagues on Social Media. Any post that identifies one of our colleagues will be removed, but the complaint will still be acknowledged and passed to our Customer Experience team to investigate and respond. We will let you know that your complaint has been passed on via the communication method used in the original contact.



MAKING A COMPLAINT TO THE CUSTOMER EXPERIENCE TEAM

Our Customer Experience team can help you with any matter. You can get in touch through:

- Live chat
- Web: <https://www.railhelp.co.uk/lumo>
- Email: Customerexperience@lumo.co.uk
- Call: 0345 528 0409
- Textphone: 18001 0800 031 8542
- By post: Freepost, LUMO CUSTOMER SUPPORT

Our Customer Experience Contact Centre opening times for Customer Experience team are 08:00 to 22:00, with our Retail Support team available 08:00 to 22:00 and our Passenger Assist team are available 24/7 daily except Christmas Day and Boxing Day.

When you call outside of the above times, an automated message will confirm that the department is closed and advise you of the above opening times.

The team will undertake a full and fair investigation of your complaint before responding to you. If you have provided a contact phone number, they may call you to resolve your complaint over the phone or obtain further information if needed to investigate your complaint fully. We aim to deal with complaints as soon as possible and we will make a full response to at least 95% of complaints within 20 working days. If we are unable to do this within this timescale, we will update you every 10 days as to the progress of your case until the matter is concluded.

MEET OUR MANAGERS

We want to understand our customers so we can shape and adapt what we do to suit their needs. We hold regular sessions where you can talk to us about our service. You will have the opportunity to ask questions and raise issues or complaints and details of these will be promoted on our Social Media feeds and on our website. You can also obtain them by asking our Customer Experience team. These sessions will primarily be held in person by one of our Customer Experience Managers on our train services. We will also attend joint 'Meet the team' events at stations with other Train Operating Companies.



MAKING A COMPLAINT – WHAT TO INCLUDE

When making a complaint, the more information you give us, the sooner we can get back to you with a full response. This also helps us ensure a swift improvement and to avoid your issue reoccurring.

It is important that you include:

- The time and date of your journey.
- A detailed description of the series of events that took place.
- The stations you travelled to and from.
- Copies / images of your tickets and any other documents that might help us identify trains or colleagues involved – this is not essential but helpful where possible.
- Any additional information that you feel will help us investigate the complaint.

HELPING YOU MAKE A COMPLAINT

You can ask for a friend, family member, guardian, support worker or carer to make a complaint on your behalf, although we will need your permission for us to deal with another person as your advocate before we discuss the complaint. This does not apply if you are the parent or guardian making a complaint on behalf of a child aged 16 or under.

We will accept complaints made by an intermediary organisation on your behalf. To do this, we will require explicit consent from you that the third party has the right to act on your behalf.

Alternative Formats

We offer our Complaints Handling Procedure in alternative formats, specifically:

- Audio
- Large Print
- Easy Read
- Braille
- British Sign Language videos.

You can ask for an alternative format by contacting our Customer Experience team. We will respond to your request within seven days.



ACCESSIBLE TRAVEL POLICY

We are committed to delivering a consistent, excellent service, making journeys easy, convenient and accessible for all our customers. How we ensure that accessibility is at the forefront of each and every stage of the customer journey is set out in our Accessible Travel Policy <https://www.lumo.co.uk/help/passenger-assist>, which includes details and arrangements on the availability of further information, including redress when assistance has not been delivered as booked.

WHEN A THIRD PARTY IS INVOLVED

When your complaint involves another Train Operating Company or Network Rail, we'll acknowledge it and send it to them and let you know when we've done that. They will then get in touch with you and address the points you have raised. Please note this may take additional time to receive a reply.

At stations, we work with other Train Operating Companies, Network Rail and other organisations using a 'One Team' approach. This allows us to work collaboratively with Station Facility Operators, using our insight to help improve the service offered there.

When your complaint involves another mode of travel, we'll acknowledge it and signpost you to the relevant organisation.

We work with various third parties to deliver different aspects of our service safely, for instance cleaning providers. If your complaint involves one of those parties, you won't need to contact them directly. We will deal with your complaint as the contractor works on our behalf.

UNPAID FARES NOTICE AND TICKET SALES

Lumo offers great value fares that are fair and we know most customers pay the correct fare for their journey, however in the UK fare evasion is estimated to cost the rail industry £240million a year, which affects fare paying customers. At Lumo we understand that sometimes things go wrong, tickets are misplaced, or railcards are lost and if that happens, we're here to ensure your case is dealt with fairly, respectfully and with discretion.

We do not operate a Penalty Fare scheme so you can come on board our trains and purchase your ticket with one of our colleagues. Please bear in mind that we do not accept cash. You will be able to pay by card. However, if you cannot pay for your ticket, an Unpaid Fares Notice will be issued to you. Further details of our Revenue Protection Policy can be found . <https://www.lumo.co.uk/help/revenue-protection-policy>



If an Unpaid Fare Notice has been filed and you want to make an appeal, you should do so within 21 days of receiving the notice.

To ensure fairness, appeals are not handled by Lumo and are administered by an independent organisation. The independent appeals process is impartial. Appeals must be made in writing to:

FREEPOST LUMO REVENUE PROTECTION

Complaints about ticket sales will be dealt with if you bought your ticket from our website or app. Complaints about tickets bought from third party retailers or other train companies should be directed to them.

CLAIMING FOR LOSSES, PERSONAL INJURY OR PROPERTY DAMAGE

Please make our colleagues aware straight away of any injury or damage that you or your property sustains whilst travelling on our trains. Letting our colleagues know if there has been an issue will allow them to make areas safe and prevent anyone else suffering injury or damage. Where possible, we will aim to resolve your complaint personally, but we may sometimes have to pass your details on to our claim handlers.

Lost, Stolen or Damage to Luggage

Any luggage that you bring with you onboard our trains is your responsibility. If it is lost, stolen or damaged, we don't provide any compensation. All property is left at the owner's risk. East Coast Trains Limited, trading as Lumo, is not liable for any loss, theft, or damage to property.

All Train Operating Companies sign up to approved arrangements governing the allocation amongst operators of liabilities and the handling of claims. Further information on the industry Claims Allocation and Handling Agreement (CAHA) can be found <https://caharegistrar.wordpress.com/>.

Should you allege you have sustained an injury involving our service, we will give consideration as to whether this should be reported to the ORR under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). If we deem this is necessary, we will share details of the incident that has occurred.

WHAT TO EXPECT FROM US

PROVIDING THE BEST SERVICE WE CAN

We will always try to give you the best service we can. Though we know that sometimes things can go wrong. If they do, we really want to hear from you about it.

We'll always look for ways to improve our service and your feedback is essential. We work with our colleagues,



regularly reviewing our processes to incorporate improvements to our services. Indeed, we may contact you following your journey to understand more about your experience and your thoughts on how it could be improved. We are committed to a standard of service which we hope not only exceeds your expectations, but also reassures you in your choice of how to travel.

- Regulation 1371/2007 on Rail Passengers' Rights and Obligations requires us to set out our service quality standards in respect of:
Information and Tickets.
- Punctuality of services, and general principles to cope with disruptions to services.
- Cancellation of services.
- Cleanliness of rolling stock and station facilities (air quality in carriages, hygiene of sanitary facilities etc).
- Customer satisfaction survey.
- Complaint's handling, refunds and compensation for non-compliance with service quality standards.
- Assistance provided to disabled people and persons with reduced mobility

We report every four weeks on what we've learnt from your feedback and complaints and performance is detailed <https://www.lumo.co.uk/help/pledges> as well as our annual Service Quality Report at <https://www.lumo.co.uk/help/how-are-we-performing>.

HANDLING COMPLAINTS FAIRLY AND EFFICIENTLY

Our complaints handling process not only makes it easy for you to tell us you're unhappy, but also helps us to put things right for you as quickly and fairly as possible. Your feedback is important to us as it forms part of our continuous improvement strategy. These are the commitments that we make to you:

- We will write everything clearly and in plain English.
- We will investigate every complaint fully and fairly. The way we investigate will depend on the complaint, but we commit to using a variety of tools, such as internal records, CCTV and where required, colleague interviews.
- We will keep your details confidential. Full details of our privacy policy are available <https://www.lumo.co.uk/about-us/policies-and-procedures/privacy-policy>
- We will address every point you raise with us, so you get a full response.



- We will do everything we can to put things right for you first time.
- We will monitor and audit our responses to make sure they're of a high standard.
- Our managers will get regular updates about the complaints, so we can make changes where we need to.
- We will have a robust handover process for complaints with other Train Operating Companies and utilise a one team approach to ensure good practice and lessons learnt are widely shared and understood.
- Complaints or feedback requesting a manager to review them will be escalated to our Customer and Stakeholder Engagement Manager.
- We will review our Complaints Handling Procedure & Policy every year to make sure it's still effective.
- We are aware that sometimes there will be increases in customer contacts, therefore we will ensure there are always enough colleagues to respond to your feedback or complaint within our timescales.

We follow a robust process when investigating a complaint which includes:

- Analysing the complaint; making sure that we identify all the elements in it and any facts that need to be checked.
- Evidence gathering; checking our service records and comparing what you experienced with what our policies promise you – if we need more information from you or others, we will ask for it.
- Corroboration and analysis; objectively reviewing all the evidence, including talking to the colleagues involved.
- Summarising: comparing what happened to you with what should have happened.
- Understanding the cause; clarifying the reasons for your experience so we can explain it clearly to you.
- Responding; sending you a response which will aim to resolve your complaint in full, where we can achieve this.



COMPLAINTS SERVICE STANDARDS

When giving us feedback or complaining through our website, app, by email, phone or post, we'll always acknowledge receipt of your complaint. This receipt will include a unique reference number.

If you speak to our colleagues or contact our Social Media team, we will try to resolve your complaint on the spot. If contacting our Customer Experience team or having had your complaint referred to them, you can expect to hear back within 20 working days. As per our regulatory requirement, our commitment is to make a full response to 95% of all complaints within 20 working days.

When the number of complaints we get goes up unexpectedly, we might take longer than expected to respond. In this case, we'll let you know and will keep you updated every 10 working days. When we experience such surges, we will advise of these on our website, when you call us, and our Customer Experience team will also make you aware of it when you email us. Furthermore, we will also inform the ORR of any significant delays in responding to you.

We report on the average time it takes us to reply <https://www.lumo.co.uk/help/pledges> and we also report our performance to the ORR who produce an annual report on our performance available on their website.

When corresponding with a customer at the point of resolution, we will ensure that all their outstanding concerns have been addressed. Where a complaint is related to a delay, we will ensure that we provide details of compensation arrangements and how to claim this.

COMPLAINTS ABOUT OUR COLLEAGUES

If your complaint is related to one of our Lumo colleagues, we will confirm where we have undertaken an internal investigation.

We are not however able to inform you of any specific action that has been taken as a result of the investigation, for data protection reasons and issues of colleague confidentiality.

We still want to reassure you that we fully investigate feedback that we receive and act as appropriate.

YOUR COMPENSATION ENTITLEMENT & RIGHTS

In line with our Customer Charter, and the National Rail Conditions of Travel, we will offer you the appropriate compensation.

We will take account of other relevant factors when deciding on levels of compensation and use discretion where appropriate. If you are entitled to compensation, or we deem it appropriate to offer you discretionary compensation, we will confirm this in our response to you.



If you are delayed, and regardless of the reason for the delay, we will offer the following Delay Repay compensation:

Length of delay (minutes)	Amount of compensation	
	Single ticket	Return ticket
0-29	0%	0%
30-59	50%	25%
60+	100%	50%
	Of the cost of the single ticket	Of the cost of the return ticket

Our Delay Repay portal can be found <https://www.lumo.co.uk/help/delay-repay>.

The length of delay will be based on our published timetable, which can include any emergency timetable that we implement. Where an emergency timetable is operating, this will be publicised in advance <https://www.lumo.co.uk/plan-your-journey/our-timetable>.

If you have a combination of tickets for your journey, we will compensate you for your whole journey. If you have a Season Ticket valid for travel on our trains, please include a copy of the ticket with your application and a copy of your photo ID card. Season Ticket holders should claim compensation in respect of each individual journey on which they are delayed and include the details of the specific train on which they were travelling.

If part of your journey was with another Train Operating Company, we will compensate you if we caused the delay. If we did not, we will ask the other Train Operating Company to contact you. We will always let you know when we have done this.

If we issue a 'do not travel' warning and you follow our advice and do not travel, you can apply for a refund from your ticket retailer or, if this is the return portion of your ticket. Should you still travel with your original ticket, you may be entitled to Delay Repay. Any compensation can be claimed by using our Delay Repay process which is outlined on our website.

Compensation is payable by BACS, card payment, E-voucher or PayIT. PayIT is a payment system operated by NatWest, more details of which can be found at www.lumo.co.uk

If you complain to us for any reason and we identify that you are eligible for compensation through our Delay Repay scheme, we will signpost you to the Delay Repay process so you can make a claim even if you did not contact us for this reason.

Note: You must not seek to recover the same money twice, for example, both under our Delay Repay claims process and the Consumer Rights Act 2015. Though, claiming compensation using our Delay Repay claims process does not affect any additional statutory rights you may have, for example under the Consumer Rights Act 2015 where we, as a company, are at fault.



You also have rights under the Rail Passengers' Rights and Obligations (Amendment) (EU Exit) Regulations 2018, SI 2018/1165 (PRO), as it applies in UK law. The PRO incorporates the 'Uniform Rules concerning the Contract for International Carriage of Passengers and Luggage by Rail' (commonly known as "CIV"). For an overview of these rights please visit the European Commission's information website about passenger rights https://transport.ec.europa.eu/index_en.

The [Office of Rail & Road](#) the National Enforcement Body for the PRO.

COMPLAINT MANAGEMENT

We reserve the right to terminate any correspondence or communication that could be construed as abusive or bullying in content, voluminous, frivolous or vexatious, or which specifically diverts resources and affects the Customer Experience area of our business. This is a decision that we take very seriously and prior to taking it, your case will be reviewed by a senior manager. We will advise you of the reasons behind the decision. This will not affect your right to appeal to the Rail Ombudsman and we will provide their details at the time the decision is made.

TAKING YOUR COMPLAINT FURTHER

Our aim is to resolve your complaint quickly and fully. However, if for any reason you are unhappy with our response, you can contact us again and a manager will review the complaint and our response as quickly as possible.

A colleague from our Customer Experience team will contact you to share the findings of our further investigation. Rest assured that escalating your complaint with us will not prevent you from involving relevant customer bodies or the Rail Ombudsman as detailed below.

THE RAIL OMBUDSMAN



Please give us the chance to try to resolve your complaint. If you are not happy with our response, and you are a consumer, you have the right to appeal to the Rail Ombudsman. The Rail Ombudsman is there to help resolve ongoing disputes between us both. It's free to use their services and they are independent of the rail industry. They act impartially and only look at the evidence available. They will help us both to reach an agreement, but if this doesn't happen, they will decide based on the evidence they've received. If you agree with their decision, then we must act on that decision.

You can appeal to the Rail Ombudsman if:

- You are not happy with our final response to your complaint which will be contained in a letter or email (sometimes called a 'deadlock letter') or



- We haven't resolved your complaint within 40 working days of receiving it.
- No more than 12 months have passed since we sent our final response.

There are some complaints that the Rail Ombudsman will not be able to investigate. For example, if it's about the way one of our services has been designed or industry policy. If that's the case, they will contact you to let you know. Where possible, they will transfer your complaint to another organisation that may be able to help you further, such as Transport Focus or London TravelWatch (the independent consumer watchdogs for the rail industry). They will independently review your complaint and where appropriate, follow things up on your behalf.

Rail Ombudsman contact details:

- Website (including online chat): www.railombudsman.org
- X: @RailOmbudsman
- Email: info@railombudsman.org
- Telephone: 0330 094 0362
- Textphone: 0330 094 0363
- Post: FREEPOST-RAIL OMBUDSMAN

The Rail Ombudsman Contact Centre Team are available:

- Monday to Friday 09:00 – 17:00
- Saturday, Sunday and Bank Holidays (incl. Christmas Day) Closed



Transport Focus

Website: transportfocus.org.uk
 X: @TransportFocus
 Email: advice@transportfocus.org.uk
 Tel: 0300 123 2350
 Post: Transport Focus
 Freepost RTEH-XAGE-BYKZ
 PO Box 5594
 Southend On Sea
 SS1 9PZ



London Travelwatch

Website: londontravelwatch.org.uk
 E-mail: Enquiries@londontravelwatch.org.uk
 X: @lontravelwatch
 Tel: 020 3176 2999
 Post: London TravelWatch
 Freepost RTEH-XAGE-BYKZ
 PO Box 5594
 Southend On Sea
 SS1 9PZ



YOUR PRIVACY AND THE DATA PROTECTION ACT

Keeping your details secure is a priority. We will follow the procedures set out in our [Privacy Policy](https://www.lumo.co.uk/about-us/policies-and-procedures/privacy-policy) (<https://www.lumo.co.uk/about-us/policies-and-procedures/privacy-policy>) We will ensure that:

- We comply with the Data Protection Act 2018 and are committed to protecting any personal data we hold on our systems.
- When you contact us, we store your personal details on our dedicated and secure systems.
- We train all our colleagues in how to follow the Data Protection Act 2018 and other relevant data protection law, and we review our processes regularly to make sure they're in line with legislation.



- All correspondence sent to our Customer Experience team is stored electronically on our Customer Relationship Management (CRM) system. Any paper mail is scanned onto the CRM system and the original is held in storage for six months before being securely destroyed.
- Where it is necessary for us to meet our obligations, or to ensure that your complaint is addressed by the correct organisation, we may be required to disclose your details to a third party. This may include providing information to a different Train Operating Company, Network Rail, Transport Focus, London TravelWatch, the Rail Ombudsman, the Department for Transport, the ORR, or insurers. We will also provide information where we are obliged to assist other bodies (such as the Police) carry out their statutory duties.

As part of its duties, the industry regulator, the Office of Rail and Road (ORR), conducts a complaint handling satisfaction survey with rail passengers to understand how well we dealt with complaints. This will involve a short online survey about how your complaint was handled and will be sent to you via email by a professional research agency working on ORR's behalf, after your complaint is closed. If you do not wish to be contacted about the survey, you can opt out. To do so please follow the link at the bottom of the email you are sent or let our Customer Experience team know when you speak to them.

If we don't hear from you for three years, we will securely and permanently delete any personal details in relation to your complaint we have for you on our CRM system. You can also request that we delete all records of your data before this six-year period. To do so please contact our Customer Experience team.

HOW WE USE COMPLAINTS DATA

IMPROVING OUR SERVICE

Your feedback and complaints form part of our continuous improvement process. We acknowledge that our customers' needs will evolve over time and this is one of the ways we can learn, adapt and improve.

When receiving your feedback, we extract the good and bad elements and share them accordingly within the business. Although we recognise the need to improve and to use our customer feedback, it is also right to recognise our colleagues who are performing to a high standard. We use such positive feedback to share best practice and improve the services we offer.



Your feedback and complaints help us work out where we can improve, and what changes we need to make to give our customers a great experience. That is why we are always happy to hear from you and will:

- Use the feedback and complaint data to identify root causes and wider contextual issues.
- Take action to reduce the chance of a similar issue happening again.
- Regularly review our performance when dealing with complaints to improve our processes.

TRAINING

All our customer facing colleagues receive training in how to identify and resolve customer complaints as they arise. When recruiting, we look for people who are motivated to achieve excellence in customer service and who can readily engage with our customers, demonstrating empathy and the ability to resolve customer concerns in real time. Our customer focused culture enables fresh thinking and gives our colleagues the assurance to do the right thing to help our customers.

Our teams receive customer service training during their induction to the company and on an ongoing basis through specific customer service training. This continuously improves their knowledge and allowing them to be innovative in their approach to resolutions.

Our training also ensures that all Lumo colleagues, as well as anybody working on our behalf, are aware of our Complaints Handling Procedure and know how to direct customers to the correct website page and our Customer Experience team. Our Social Media team are trained to understand when a customer wishes to make a complaint and where to direct them.

Our Customer Experience team has received extensive training regarding how to identify a complaint; how to ensure each issue raised within that complaint is accurately recorded on our Customer Relationship Management system and how to resolve the complaint to a high standard, focusing on customer satisfaction.

GOVERNANCE, POLICY AND LEADERSHIP

Our Head of Customer and Stakeholder Engagement is responsible for the overall resolution of complaints and how they are handled. Our internal reporting processes focus on the intelligence we have and allow our leadership team to regularly review feedback and complaints. Areas for improvement and awareness of concerns are shared across the whole business so that we instil a culture which delivers an even better level of customer service.

Information about feedback and complaints trends (e.g., topics and volume) are communicated at our four-weekly Customer Experience Focus Group, attended by our executive team. Analysis of feedback and complaints highlights key topics, insights and trends and in turn helps us to inform



longer term business strategy.

We will follow the industry measure for our reporting: complaint rate per 100,000 journeys on a quarterly basis.

QUALITY ASSURANCE

We will continuously monitor and improve our Complaints Handling Procedure to make sure that it is fit for purpose, and that it meets the required standards and our commitment made to our customers.

Calls made to our Customer Experience team are recorded and monitored. This helps us to ensure we are dealing with feedback and complaints in the best way possible.

Our Customer and Stakeholder Engagement Manager reviews customer experience correspondence over various channels and uses it to improve the quality and standard of how we manage and resolve complaints.

We will use mystery shopping activities to monitor the effectiveness of our processes and check the quality of our responses.

Every member of the Customer Experience team has their work monitored against a Quality Assurance framework to make sure our high standards are maintained. Additional training and coaching are also provided where appropriate.

RECORDING COMPLAINTS

All communications with our Customer Experience team are stored on our Customer Relationship Management system. This data is collated centrally and used to generate a number of daily, weekly and monthly reports that are passed to the managers responsible for the relevant area of the business. Trends are identified, lessons are learnt and problems are resolved. Each time a customer contacts us it is important to us and we value feedback on the service we provide. Feedback and complaints are directed into an internal continuous improvement process which seeks to identify the causes of customer dissatisfaction.

We will also provide data to the ORR for regulatory monitoring purposes every four weeks. This includes the number of comments and complaints we receive and how quickly we deal with them.

RECORD KEEPING

All complaints are recorded along with general information that helps us identify areas for improvement. This includes:

- Journey information such as where it started and ended.
- The date of travel.



- The type of ticket held.
- The date of the journey.
- The name of the adviser who dealt with the complaint.
- The date we received the complaint.
- The date we responded to the complaint.

Whatever your reason for contact we look forward to hearing from you and making our services better for you.

