Passenger experience statistics:

- **Passenger Rail Service Complaints statistical release.**
- **Passenger satisfaction with complaints handling factsheet**
- **Delay compensation claims factsheet**

Quality and Methodology Report

Release Date: 25 June 2020

Table of contents

Introduction

This is a report on the quality of statistics for the 'Rail passenger service complaints' statistical release. This report also covers the 'Rail delay compensation claims' factsheet and 'passenger satisfaction with complaints handling' factsheet. This quality report aims to help users to understand the quality of our statistics, and ensures ORR is compliant with the three quality principles in the Code of Practice for Official Statistics[1].

The quality report covers the following areas:

- **Methodology** – detail on the various data sources, methodology used to compile the statistics and changes to data previously published;

- **Historic background** – a background to each statistic and details of changes throughout the time series;

- **Relevance of the data** – the users of the statistics, and our engagement;

- **Accuracy and reliability** – the accuracy and reliability of the statistics;

- **Timeliness and punctuality** – our timescales for the production, quality assurance and publication of each statistic;

- **Accessibility and clarity** – the format of our statistics and where they can be found;

- **Coherence and comparability** – comparisons to similar statistics published elsewhere.

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[1] Suitable data sources: Statistics should be based on the most appropriate data to meet intended uses. The impact of any data limitations for use should be assessed, minimised and explained.

Sound methods: Producers of statistics and data should use the best available methods and recognised standards, and be open about their decisions.

Assured quality: Producers of statistics and data should explain clearly how they assure themselves that statistics and data are accurate, reliable, coherent and timely.

The Code of Practice can be accessed on the statistics authority website.

Rail passenger complaints methodology

Rail passenger complaints

Link:

[Rail passenger complaints page](#)

Data source:

Administrative data submitted by the train operating companies

Methodology:

Train operating companies (also known as train operators) record information on complaints and other consumer data made by rail passengers. ORR then collects this aggregated data every rail period (defined as usually every 4 weeks) using consistent guidance and a set template agreed in advance.

The definition of a complaint:

The complaints handling guidance[2] (section 2.7 to 2.11) defines a complaint as:

> **"Any expression of dissatisfaction by a complainant or potential complainant about service delivery or company or industry policy"**

The following contact methods for complaints are currently collected.

CONTACT METHOD	IN SCOPE
LETTER (INCLUDING COMMENT CARDS)	√
EMAIL/WEBFORM	√
TELEPHONE CALL	√
MEET THE MANAGER	√
ONLINE FORUMS (INCLUDING LIVE CHAT)	√

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[2] [Complaints handling procedure guidance](#)

The following criteria are **not** counted as a complaint within these statistics.

CONTACT METHOD	IN SCOPE
ANOTHER TOC'S COMPLAINT	X
DELAY COMPENSATION CLAIMS (NOTE BELOW)	X
FEEDBACK	X
NATIONAL RAIL ENQUIRIES (NRES)	X
PRAISE (EXCLUDED FROM SECTION B)	X
SOCIAL MEDIA (NOTE BELOW)	X
TRANSPORT FOCUS/LONDON TRAVELWATCH	X

Social media comments are excluded from these statistics. However, there may be circumstances in which the feedback on social media lends itself to further investigation. The train operator will then assist the complainant in making a formal complaint which will then be dealt with in accordance with the licence holder's Complaints Handling Procedures (CHP). For example, this may involve signposting the complainant to a webform or providing an email address at which they can log formal complaints. This complaint will then be in scope to be included within these statistics.

For further information on what is in and out of scope as a complaint, please see the **technical guidance**[3] ORR issues to train operating companies.

Conversion from periodic to quarterly data

The rail industry reports data on a periodic basis rather than the more recognised reporting cycles such as monthly or quarterly. A period is normally a 28-day, or four weekly, period for business reporting purposes (Sunday to Saturday) and there are 13 periods in a financial year. The length of a period may differ at the end of the financial year, 31 March, and the beginning of the financial year, 1 April, to ensure that a break is made at 31 March.

The standard method for apportionment is based on the number of days within the period that fall into the relevant quarter. For example, the dates in period 4 cover both Q1 and Q2. When the quarterly data are calculated for 2019-20, 8/28 of the data are assigned to Q1 (covering 23 June

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[3] Reference guide for ORR core data compliance reporting

to 30 June) and 20/28 of the data are assigned to Q2 (covering 1 July to 21 July). The breakdown of the calculations used for 2019-20 are as follows:

Quarter	Calculation
2019-20 Quarter 1	Period 1 + Period 2 + Period 3 + 8/28 of Period 4
2019-20 Quarter 2	20/28 of Period 4 + Period 5 + Period 6 + 16/28 of Period 7
2019-20 Quarter 3	12/28 of Period 7 + Period 8 + Period 9 + 24/28 of Period 10
2019-20 Quarter 4	4/28 of Period 10 + Period 11 + Period 12 + Period 13

The quarterly percentage of complaints handled within certain response times can be obtained from the periodic data received by the train operators in the following way as seen here:

	P1	P2	P3	P4
Total complaints	20	30	25	4
% responded to within 20 working days	50%	80%	60%	75%

	P1	P2	P3	P4
Complaints responded to within 20 working days	10	24	15	3

	Q1
Total complaints	79
Complsints responded to within 20 working days	52
% responded to within 20 working days	65.8% (52/79)

Complaints rates

The overall complaints rate is calculated from the volume of complaint correspondences closed by all operators, normalised by the number of passenger journeys. The complaints rate is then presented as the number of complaints per 100,000 journeys as calculated below:

$$Complaints\ rate = \left(\frac{Number\ of\ complaints\ closed}{Number\ of\ passenger\ journeys}\right) \times 100,000$$

The statistical release focuses on complaint rates rather than the volume of complaint correspondences closed to enable fair comparisons between train operators and over time to be made. This is because comparing different train operators may lead to misleading conclusions dependant on operator size.

The number of passenger journeys used in this calculation are extracted from the LENNON (Latest Earnings Network Nationally Over Night) ticketing and revenue database, supplemented with data that is provided by train operators on journeys that have been sold outside the LENNON system. More information on how passenger journeys are calculated can be found in the quality report for the 'Passenger rail usage' statistical release.

The volume of complaints closed only includes when the operator makes their first full reply to the complainant, which is known as the first full substantive response. A first full substantive response is defined as, in the view of the operator, one which reasonably provides a full response to the consumer's complaint. If the complaint is subsequently re-opened and the operator provides a second full substantive response, this response is not counted in these statistics. Delay compensation claims are not recorded as complaints unless there is clear dissatisfaction shown when passengers submit a claim that is recorded as a formal complaint.

Complaints by category

Each operator assigns categories to each complaint correspondence they receive. The complaint categories are based 14 distinct high-level categories as follows:

- Accessibility issues,
- Company policy,
- Complaints handling,
- Delay compensation schemes,
- Environmental,
- Fares and retailing,
- Provision of information,
- Quality on train,
- Safety and security,
- Staff conduct and availability,
- Station quality,
- Timetabling and connection issues,
- Train service performance, and
- Other – miscellaneous.

The ORR provides a template to train operators which consists of these 14 high-level categories broken down into 71 separate complaint categories to be reported on. Many of these categories are based on the National Rail Passenger Survey (NRPS) categories used to measure passenger satisfaction where this extra disaggregation is needed.

When there are multiple causes for a complaint covered in a single complaint correspondence, each of these topics should be recorded against the different categories. Therefore, the total

number of complaint categories may be greater than or equal to the number of complaint correspondences. This is also the reason why the percentage of complaint categories are reported on in this statistical release rather than volumes of different complaint categories.

In 2011, ORR were asked to publish more disaggregated complaints data by the Prime Minister in his letter on transparency and open data. As part of this process, from 2013-14, the list of complaint categories was extended to align with the Transport Focus National Rail Passenger Survey (NRPS) categories, helping to create a consistent industry wide set of complaints categories which will allow users of the statistics to directly track complaints data with NRPS satisfaction scores.

In 2015-16, the complaint categories for accessibility issues and complaints handling were further disaggregated into a number of more detailed categories so that complaints regarding specific issues such as the speed of response time to complaints and the lack of facilities for disabled people could be monitored. This was part of wider work being undertaken by ORR to monitor the compliance by train operating companies with Complaints Handling Procedures (CHPs) and Accessible Travel Policies (ATPs). For 2016-17, further categories were added to monitor the volume of complaints received regarding delay compensation schemes. For 2017-18, further accessibility complaint categories were added following consultation with the train operators.

We are continuing to engage with train operators to ensure their full support for these changes and work with them to improve the quality and comparability of the complaints category data.

The full list of complaint categories can be viewed in the data template ORR issues to train operators. Please see section A of the data template[4].

Response times to complaints

For each rail period train operators provide the ORR with the percentage of complaint correspondences they have handled within 20 working days. The CHP licence requirement is for train operators to close 95% of complaints within 20 working days. From 2015-16 Quarter 1, ORR have also collected data on the percentage of complaints responded to within 10 working days, as well as the percentage responded to within the operators' internal target. This data is available on the Passenger rail service complaints page of the data portal in Table 14.2.

The response times reported on are for first full substantive responses only. The definition of first full substantive response is as follows:

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[4] Complaints template for train operating companies

> **The rail company's first substantive response which in its view, reasonably provides a full response to the consumer's complaint. This does not include an acknowledgement or holding response.**

Further correspondence with the complainant following the first full substantive is not counted as part of the response time. In order to classify as a full response each complaint category within the correspondence needs to have been addressed. The number of days to answer a complaint is to be reported in working days only and therefore excludes weekends and bank holidays. The operators can put the complaint on hold while waiting for the complainant to reply to them with further information to enable the complaint to be investigated, a process also known as 'stop the clock'. This information asked for by the complainant could be proof of purchase, ticket information, or other information specific to the complaint. In these cases, the clock is re-started when the information has been received and stops when the first full substantive response is issued. If the complainant does not respond then the complaint can be closed at the date when the operator replied asking for more information, but operators are asked to make it clear to the complainant the timeframe within which they would expect the complainant to respond.

Complaints correspondence by contact method

The complaint correspondence data are supplied to the ORR split by contact method type for each complaint closed. The contact methods include by e-mail/webform, by telephone, by letter, by online forums, and by 'meet the manager' sessions.

These figures show the relative frequency with which complaints are received by the different contact methods, and does not take into account the number of complaint topics covered within each correspondence. Note this is a change in methodology for the 2016-17 statistical releases where previous publications had used the complaint category data to calculate this metric rather than overall complaint correspondences. This metric is only reported on an annual basis with the Q4 statistical releases but is still disaggregated on a quarterly basis.

Praise rate

Praise rate statistics shows the volume of praise comments received by each operator, and is normalised in the same way as the complaints rate, with the measure presented as the number of praise comments per 100,000 journeys. Praise correspondence is collected alongside complaint categories data submitted to the ORR every period.

In 2015-16, praise was included as a category for the first time but was included in Table 14.3 as a percentage of all complaints, instead of separately in Table 14.17 from 2016-17 onwards (all

tables are available on the [Passenger rail service complaints page](#)). Since praise is not categorised as a complaint, it was decided to introduce the praise rate instead, and for this reason, statistics on complaint categories in 2015-16 are not comparable with those after this year as 2015-16 data include praise correspondence and not just complaints correspondence. This metric is only reported on an annual basis with the Q4 statistical releases but is still disaggregated on a quarterly basis.

Rail passenger complaints background

Prior to 2010, the Department for Transport (DfT) was responsible for collecting complaints data from each of the franchised train operating companies before supplying the information to ORR for publication in National Rail Trends. Following an agreement with DfT, ORR took responsibility for collecting the complaints data directly from the train operating companies. For further information on the transfer of responsibility, please see the [project initiation document](#).

Since the transfer of responsibility for data collection and licences, ORR worked with the train operators to increase the data quality and breadth of statistics collected on complaints handling. This included the collection of new complaint categories (see the methodology chapter on complaints by category) and further discussions on data quality provided by operators (see the 'quality of these statistics' section). The collection of delay compensation claims data was included from 2018-19 and forms the data given in the 'delay compensation claims' release. ORR continue to proactively work with train operators to increase the quality of these statistics to enable us to regulate operators more effectively. Many of these improvements are detailed in this document.

During 2015 ORR took over the responsibility for the [Complaints Handling Procedures](#) (CHPs) and Disabled People's Protection Polices (DPPPs) (now updated as [Accessible Travel Policies](#) (ATPs)) from DfT. In order to monitor these licences, ORR agreed with the train operators a set of data to monitor compliance known as the submission of 'Core Data'. More information on what data ORR asks from the train operators can be found on the [Core Data webpage](#). A summary of the core data submitted by train operators with respect to complaints are published in ORR's 'passenger rail service complaints' statistical release.

License conditions and Core Data

Train operators are obliged to provide certain information to ORR as part of their license agreements known as [Complaints Handling Procedures](#) (CHPs) and [Accessible Travel Policies](#) (ATPs), where ATPs have replaced the previous licenses requirements for operators as given in their Disabled People's Protection Polices (DPPPs) as of 2019. This information in relation to their

passenger-facing activities is termed '**Core Data**'. The provision of this data provides a way for train operators to demonstrate they are complying with their obligations to passengers and allows the ORR to monitor operators' progress in these areas over time, which in turn improves transparency and accountability for rail passengers.

A list of all Core Data measures that are required from train operators can be found on ORR's Core Data webpage. This includes data on complaints handling and delay compensation claims which are presented in the statistical releases. The ORR sets out detailed technical guidance to train operators in advance, as well as a Microsoft Excel data collection template for operators to submit data with, both of which can be found at the above link.

Since June 2016, ORR have published an annual consumer report called 'Measuring Up'. Measuring Up focuses on ORR's passenger facing work, and supports ORR's objective of better rail customer service. The data covered within this report is used extensively as evidence within Measuring Up.

Complaint appeals to passenger watchdogs

Data source:
Administrative data submitted by Transport Focus and London TravelWatch

Methodology:
Passengers are able to appeal any decision made by an operator in respect to their complaint. From 26 November 2018 the Rail Ombudsman was started in order to provide a passenger service for unresolved customer complaints within the rail industry. As a result of this new process from November 2018, many appeals are now being dealt with by the Rail Ombudsman instead of Transport Focus or London TravelWatch.

Prior to the introduction of the Rail Ombudsman train operators were required to sign-post complainants on their second substantive response to either Transport Focus or London TravelWatch.

Since the introduction of the Rail Ombudsman, complainants are now required to receive a deadlock letter from the train operator. The train operator will issue a deadlock letter when the complaint can not be resolved, or the complaint has not been resolved from 8 weeks since the train operator first received the complaint.

The Rail Ombudsman will review the complaint to see whether the complaint is in or out of scope. If the complaint falls out of scope for the Rail Ombudsman, the complaint is then forwarded to London TravelWatch or Transport Focus. The type of complaints which are out of scope for the

Rail Ombudsman are mainly to do with the train operator's policy or a penalty fare appeal, or if the appeal was received prior to the launch of the Rail Ombudsman.

London TravelWatch and Transport Focus play vital roles in championing passenger rights within the rail industry in Great Britain. Transport Focus is the independent transport user watchdog, which includes representing Britain's rail passengers (outside London). Transport Focus use their knowledge to influence decisions on behalf of passengers, working with the industry, passenger groups and national and local governments to secure journey improvements. London TravelWatch is the independent, statutory watchdog for transport users in and around London. Transport Focus and London TravelWatch provide the ORR with the number of appeals they have closed on behalf of passengers, and the complaint categories to which the appeals relate. In a similar way to complaint correspondences and categories, the number of appeal categories should always be equal to or higher than the number of appeals closed as one appeal can detail more than one appeal complaint category.

Appeals data are presented in the statistical release by train operating company and complaint category. The number of appeals closed and appeal complaint comments for Transport Focus and London TravelWatch can provide a key indicator of the quality of response passengers received from train operating companies when making their initial complaint, as well as the types of complaint that do not receive adequate initial responses.

National Rail Enquiries Service (NRES) data

Data source:

Data is provided by the Rail Delivery Group (RDG) as part of their National Rail Enquiry Service (NRES) system.

Methodology:

National Rail Enquiries, part of the Rail Delivery Group (RDG), provides information for all passenger rail services on the National Rail network in England, Wales and Scotland. Enquiries to National Rail Enquiries can be made through numerous different channels including telephone and self-service channels such as the National Rail Enquiries website. The National Rail Enquiry Service (NRES) is a telephone enquiry service that provides information primarily on train times and fares. The data presented in the passenger rail service complaints statistical release relates to enquiries made through the NRES only.

NRES is regulated by DfT and its minimum performance standards are set out in the NRES Agreement. The agreement is for 93% of all calls in a financial year to be answered, and for no less than 90% of all calls in any four-week railway period to be answered. It also introduces a formal quality regime, which includes monitoring through mystery shopping surveys. NRES is always susceptible to volatile demand such as time of day, sporting events, or say weather.

The data are collected at a daily level and provided to ORR after the end of each railway period by RDG. The quarterly data are calculated by summing the data for the relevant dates for each quarter, though apportionment is not required here as the data is provided at a daily level. NRES data are presented as the volume of calls received and the response rate.

Since 2012-13 Quarter 2 figures for self-service channels and mystery shoppers have been removed from ORR publications as RDG no longer supplies ORR with this data. More information on NRES can be found on the national rail website. This metric is only reported on an annual basis with the Q4 statistical releases but is still disaggregated on a quarterly basis.

Delay compensation claims methodology

(Note these statistics have not been badged as National Statistics. These statistics are published as a separate factsheet, and are available on ORR's data portal)

Link:
Delay compensation claims

Data source:
Administrative data submitted by the train operating companies

Methodology:
As part of train operators' Core Data requirements, train operators provide information on delay compensation claims on a periodic basis. Core Data is the term ORR uses to describe the primary compliance monitoring framework it uses to assess its licensee's compliance with their regulatory obligations in relation to passenger-facing activities.

The ORR collect number of delay compensation claims closed, received and approved. ORR also ask for the percentage of claims responded to within 20 working days as train operators have a target to process all delay compensation claims within one month of receipt, as given in condition 30.3 of the National Rail Conditions of Travel.

Data compensation data was first collected from train operators in 2018-19. ORR's technical guidance to operators can be seen on the ORR Core Data page (within the related documents section). Delay compensation claims are not considered as complaints, though there may be formal complaints made about delay compensation schemes which are then included as complaints. Unlike complaints handling, train operators cannot 'stop the clock' while the operator is waiting for the complainant to provide information to them.

ORR publish quarterly factsheet and data tables on delay compensation. Data are presented on the Data Portal on a periodic basis and not on a quarterly basis as per complaints data as passenger journey volumes for complaints rates are only available by quarter, and periodic data matches the rail industry's standard reporting.

Different type of delay compensation schemes:

Type of schemes: The most popular delay compensation scheme is Delay Repay. Delay Repay is a national scheme train operators use to compensate passengers for delays. For those operators using the Delay Repay scheme, all ticket types are covered and passengers can make a claim for delay compensation whatever the cause of disruption. There are two types of Delay Repay schemes available:

Delay Repay 30 (DR 30): Passengers can claim compensation if the train is delayed by 30 minutes or more. Passengers delayed between 30 and 59 minutes are entitled to 50% of the cost of a single ticket, and if the passenger is delayed by 60 minutes or more, the passenger is entitled to a 100% refund of a single ticket. If delayed 120 minutes or more the passenger can claim the cost of a return journey if they have a return ticket.

Delay Repay 15 (DR 15): Passengers can additionally claim compensation if the train is delayed by 15 minutes or more. DR 15 allows a passenger to claim 25% of the cost of a single ticket if they are delayed between 15 and 29 minutes. Eight train companies operated this scheme from the beginning of 2019-20, with East Midlands Railway, Southeastern and Avanti West Coast moving to this scheme during 2019-20.

Other schemes (traditional schemes): A small number of operators run other schemes which are different to Delay Repay. Often these schemes have different timeframes to be eligible, and compensation can vary between each schemes. Compensation may not be available if the delay is caused by an event outside the operators control.

Some other train operators offer traditional charter schemes that are specific to that operator, with some operators' offering automated or automatic delay compensation. Due to changes in delay compensation scheme and the number of passenger journeys, caution is to be taken when comparing between train operators and/or previous years in Table 17.01.

For the latest delay compensation schemes each train operating company uses, please see the background information within the delay compensation factsheet.

Passenger satisfaction with complaints handling methodology

(Note these statistics have not been badged as National Statistics. For 2019-20 these statistics have been published as a separate factsheet on ORR's data portal)

Link:
Passenger rail service complaints

Data source:
ORR survey of passengers' satisfaction with complaints handling.

Methodology:
After a passenger makes a complaint to a train operator, they are invited to participate in a follow up survey by an independent research company, commissioned by ORR, about their experience of how the complaint was handled.

The survey asks questions relating to the complaints process and resulting outcome. The complainant is asked to rank their satisfaction with each on a five-point scale or, in some instances, to provide a qualitative response via an open text box. This survey allows ORR to monitor industry performance over time and improve the transparency of passengers' experiences.

The responses to the survey vary by each train operator and do not necessarily reflect the volume of complaints closed by each train operator. Therefore, the national results have been weighted by complaint volumes: weighting helps to ensure the results from the survey are representative of complaints received by train operators. The weights are produced by calculating an operators' percentage of overall responses to the passenger satisfaction survey and dividing by the percentage of all complaints that an operator is responsible for. Weighting is done every railway period and the periodic weight values are then apportioned into quarterly/annual.

Time series information:

The survey started during October 2015, and train operators joined the survey at different points throughout the year (see table below). Full year data was first published for the financial year 2016-17.

Train operating company	Date the operator joined the survey
Avant West Coast	2017-18 Period 13
c2c	2016-17 Period 3
Caledonian Sleeper	2017-18 Period 3
Chiltern Railways	2016-17 Period 6
CrossCountry	2015-16 Period 8
East Midlands Railway	2015-16 Period 8
Govia Thameslink Railway	2016-17 Period 10
Grand Central	2015-16 Period 8
Great Western Railway	2016-17 Period 7
Greater Anglia	2015-16 Period 11
Heathrow Express	2017-18 Period 1
Hull Trains	2015-16 Period 13
London North Eastern Railway (LNER)	2015-16 Period 9
London Overground	2015-16 Period 9 to 2016-17 Period 8. 2017-18 Period 11 to 2018-19 P13. 2019-20 unavailable at the time of publication. London Overground were unable to supply 2019-20 data on time for publication due to the relevant staff at TfL who generate the data reports being furloughed due to coronavirus (Covid19).
Merseyrail	2015-16 Period 9
Northern Trains	2015-16 Period 8
ScotRail	2016-17 Period 1
South Western Railway	2016-17 Period 4
Southeastern	2016-17 Period 7
TfL Rail	2017-18 Period 11 to 2018-19 P13. 2019-20 unavailable at the time of publication. TfL Rail were unable to supply 2019-20 data on time for publication due to the relevant staff at TfL who generate the data reports being furloughed due to coronavirus (Covid19).
Transport for Wales (TfW) Rail	2016-17 Period 7
TransPennine Express	2016-17 Period 7
West Midlands Trains	2015-16 Period 13

Note: The most recent train operating company name has been shown in the table above as of 2019-20 Q4.

In 2018-19 the data was not robust enough to publish. This was due to a substantial decline in response volumes and a change in methodology affecting the quality of the data. The reduction in response volumes was due to the introduction of the new General Data Protection Regulations (GDPR) from May 2018. GDPR caused the sample size in 2018-19 to decrease by 91% (see table below) compared to 2017-18. Consequently, many train operators who participated in 2018-19 had a too low sample sizes to report robust results on.

Furthermore, GDPR changed the methodology for how complainants were contacted to participate in the survey. Participants had to actively opt-in to receiving the survey as part of GDPR. This change in methodology also meant that the 2018-19 results are not comparable to either 2017-18 or 2019-29 data.

For 2019-20 ORR reverted to previous methodology used in 2017-18. This resulted in the sample size increasing substantially from 2018-19, and created a robust data at train operator level. The responses to the survey by financial year are shown in the table below:

Survey responses by financial year:

Financial year	Responses
2015-16	5,780
2016-17	29,606
2017-18	41,789
2018-19	3,896
2019-20	54,573

Relevance

The degree to which the statistical product meets the user needs in both coverage and content.

Data provided to us comes from administrative data that is sourced directly from the train operator's management systems and aggregated for reporting to ORR. Some of the users of this data published in our statistical releases are as follows:

Users	Description
Train operators	The train operator's main purpose for these systems is to manage the handing and responses to customer complaints and delay compensation claims, as well as fulfilling their obligation to provide this data to ORR.
Office of Rail and Road (ORR)	These data are used internally at ORR to monitor train operators' obligations to passengers in relation to their CHP and ATP licenses. This includes the escalation of issues if train operators, for example, are not responding to complaints within regulated targets. It is also used to inform policy decisions on operators' consumer-facing activities.
Department for Transport (DfT)	The data informs policy at DfT regarding the handling of complaints in the industry at train operator level and for the industry as a whole, as well as for planning and monitoring purposes.
Rail passengers	Complaints and appeals data are key measures of rail service satisfaction. Users interested in rail satisfaction can also compare other datasets available such as the National Rail Passenger Survey (NRPS) by Transport Focus. The published statistics on complaints and appeals data provides transparency and accountability to rail passengers about their handling of complaints. Unlike other system-based measures, the number of complaints reflects direct feedback from passengers.
Other external users	This data may be used by consultants or others to identify key and trends for investigating consumer measures regarding rail passenger services.

More detailed information on users of ORR statistics and meeting the needs of users is available on our user engagement webpage.

Accuracy and reliability

The proximity between an estimate and the unknown true value.

The data supplied are subject to extensive quality assurance processes by ORR, including a suite of validation checks to ensure the data meets the required specification and is in line with previous trends. ORR publish a list of quality assurance checks done within its ORR Core Data guidance (see Annex B of the Core Data guidance).

ORR carry out periodic quality assurance checks on all Core Data submitted by train operators. Any arising issues are flagged with the data suppliers who must confirm the anomalies or correct the data, and then re-submit. Explanations from the data suppliers regarding data anomalies are included within our commentary to explain the data and trends. ORR keep a comprehensive log of data issues and corrections that have arose throughout the year.

ORR have built a good working relationship with the train operators to assist with this communication on data supply and they are encouraged to raise concerns or anomalies at an early stage. Consultation with data suppliers are held every January where the operators are able to raise issues. Following this consultation, feedback from operators is considered and guidance for the collection of data is then published. The operators are required to officially sign-off that their data returns will follow ORR guidance, as published in the 'ORR core data compliance reporting' section here, whilst also highlighting any data quality issues which may impact on this.

An independent audit of this data was carried out in April 2018. The audit reviewed the ORR processes and controls over the quality and robustness of data. The following were recommended as important improvements:

Recommendation	ORR action
Based on a cost/benefit analysis, ORR should consider whether train operators should be asked to provide source information to support the data provided during the data collection process or develop an audit programme to review the data collation and validation processes within the train operators.	This recommendation will be incorporated into the programme to improve ORR's quality assurance practices: specifically data assurance where deemed appropriate and proportionate.
As planned, ORR should ensure that the data provided by the train operators is formally signed off by an appropriate individual within the train operators.	Complete: Data sign-offs can be viewed here (under ORR core data compliance reporting):

A number of good practices were highlighted:

- Clearly defined roles and responsibilities within ORR teams for data collation, validation, and reporting;
- Ongoing communication with train operators (workshops and email correspondence);
- Guidance provided to train operators outlining the type of data required, reporting timeframes and format;
- Use of a standardised data collection template;
- Use of data validation software to identify instances of data incompleteness and movements against trend.

These data are stored in a secure data warehouse maintained by ORR. The data are then prepared for publication including the quality assurance of tables and charts produced and providing supporting commentary regarding the key trends, methodology and quality measures. All statistical publications are subject to internal peer review within the Information & Analysis team at ORR including by the statistical Head of Profession, confirming the data meets the quality standards and are fit for publication.

Orderly release

Organisations should commit to releasing their statistics in an open and transparent manner that promotes confidence.

At the end of each rail period, train operators are given 15 working days to provide their submission of Core Data to the ORR (2019-20 timescales are shown below). The dates for all rail periods can be found on the ORR data portal.

Once train operators submit their Core Data to ORR, ORR plan two weeks to quality assure the data. Any issues are flagged with the data suppliers who must confirm the anomalies or correct the data and re-submit.

As dates in rail periods do not directly correspond to dates in quarters, some apportionment is made to convert periodic figures into quarterly figures, as detailed in the methodology section above. This may mean in some cases the quarterly figures cannot be calculated until 6-7 weeks after the quarter has finished. Generally, the statistical release is ready two to three months after the quarter has finished.

The publication schedule outlines the publication dates for statistical releases up to 12 months in advance.

Accessibility, clarity and insight

Statistics and data should be equally available to all, not given to some people before others. They should be published at a sufficient level of detail and remain publicly available.

Statistics and data should be presented clearly, explained meaningfully and provide authoritative insights that serve the public good.

All rail statistics data tables can be accessed free of charge on the ORR Data Portal. Charts and commentary about the statistics and trends are provided in the theme pages on Passenger rail service complaints and Rail delay compensation claims.

ORR uses information provided in this release in the annual ORR 'Measuring Up' publication. This report focuses on the performance of train companies and Network Rail in the consumer areas ORR regulates such as ticket retailing, passenger information, assisted travel and complaints & redress.

ORR wants the rail industry to be more open and transparent. We have established a transparency programme to drive our ambitious vision for the industry, and govern a number of projects to support our aims and objectives. Future transparency projects include improving the data portal as a means of disseminating data and encouraging the industry to publish more disaggregated data. More information is available on our user engagement webpage.

For further information about these statistics, please contact the Information & Analysis Team at rail.stats@orr.gov.uk.

ORR is fully compliant with the Statistics and Registration Service Act 2008 and principle 4 of the Code of Practice for Official Statistics.

Coherence and comparability

Coherence is the degree to which data that are derived from different sources or methods, but refer to the same topic, are similar. Comparability is the degree to which data can be compared over time and domain.

Social media
Complaints submitted via social media, such as on Twitter and Facebook, are **not** currently included within the complaints statistics. The number of complaints received via such sources, the definition of a 'complaint' and the resources that each train operator allocates to these social media mediums varies significantly, and therefore they are excluded from the published figures.

In March 2015, ORR published a [report on the increasing use of social media amongst passengers and the challenges in capturing complaints](). Methodology on recording social media complaints is still being reviewed by the ORR.

Many train operators signpost customers to their formal complaints handling methods in their social media interactions. While this interaction is not classed as a complaint, a subsequent complaint using formal channels would be classed as a complaint.

Rail passengers and their reluctance to claim
Rail passengers may be reluctant to use formal complaint channels to complain about their train operators. Some of the possible reasons why passengers may not complain are as follows:
- Passenger did not have time to complain;
- Their complaint was resolved to their satisfaction by social media such as tweets;
- Passenger found it too difficult to complain;
- Passenger did not believe their complaint would be resolved to their satisfaction.

It should be noted that complaints about the complaint procedure itself are recorded as a category.

There may also be operational differences between operators that could make passengers claim more than others. One of these differences is while the volume of complaints is normalised by number of passenger journeys, it is not normalised by passenger kilometers, so passengers on longer distance services may be more likely to complain than on shorter commuter services where they are only on the service for a very short amount of time.

Comparability

The complaints rate metric is the longest comparable complaints dataset with data going back to 1997-98 Q3 and annually from 1998-99. Complaints rates and response rates within 20 working days are accessible from 2007-08 Q4 and annually from 2007-08 onwards. Complaints by complaint category are also accessible from 2007-08 Q4 and annually from 2007-08 onwards, though data by train operator is only available quarterly from 2010-11 Q1.

Data on appeals closed can be found from 2014-15 Q1 onwards, although data from London TravelWatch is only included from 2015-16 Q1. NRE telephone service data is available back to 1997-98 Q2.

Delay compensation claims
Data was first collected on data compensation claims in 2018-19. There is no comparable dataset before 2018-19 for recording the numbers of delay compensation claims, however DfT publishes the amount of compensation amounts paid by train operators from 2009-10 onwards here. The DfT figures are not comparable to statistics given here due to the different time periods involved, changes to delay compensation schemes and franchises from previous years, and the fact DfT figures include discretionary compensation payments made following complaints of poor service.

While delay compensation claims are not recorded as complaints in these statistics, claims may lead to formal complaints being made about the delay compensation scheme or outcome. However, there may be a correlation in the number of delay compensation claims and complaints as both are related to the performance and reliability of train services. Additionally, an increased number of complaints on delay compensation claims may increase the number of appeals to Transport Focus and London TravelWatch on this category. Furthermore, for the appeals that go to the Rail Ombudsman, delay compensation schemes are the most appealed about category.