Rail passenger experience

- Passenger rail service complaints

- Delay compensation claims

- Passenger satisfaction with complaints handling

Quality and Methodology Report
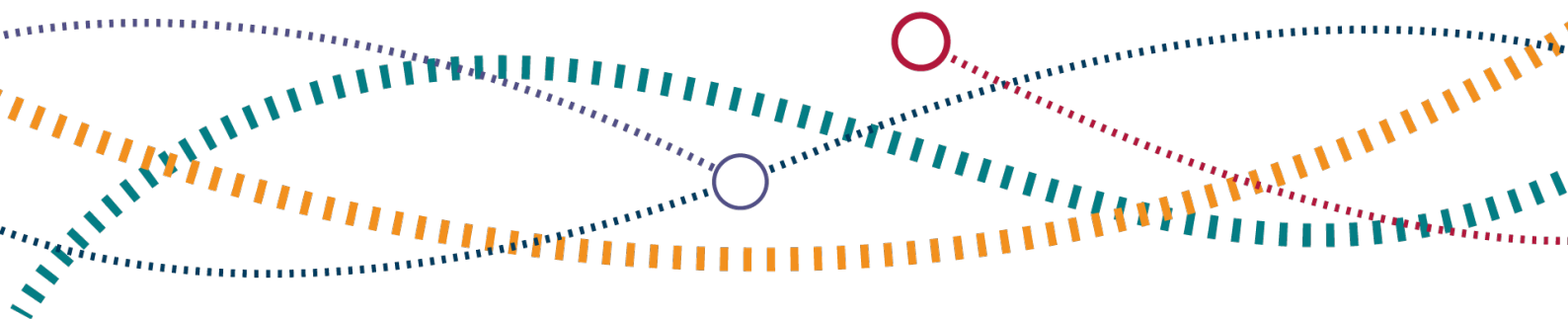
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Contents

Introduction

This is a report on the quality of statistics for the following passenger experience statistical releases, factsheets and associated data:

1. Passenger rail service complaints statistical release

2. Delay compensation claims factsheet

3. Passenger satisfaction with complaints handling factsheet

This report helps 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](#):

Q1: Suitable data sources

Q2: Sound methods

Q3: Assured quality

This report also provides information on the methodology and data sources used to produce the statistics.

This report covers the following areas:

●   Data sources, methodology and definitions – detail on the various data sources, methodology used to compile the statistics and definitions.

●   Historic background – a background to complaints statistics and details of any changes throughout the time series;

●   Relevance to users – the users of the statistics, and our engagement;

●   Accuracy and reliability – the accuracy, data coverage and quality assurance of the statistics;

●   Timeliness and punctuality – our timescales for the production, quality assurance and publication of the statistics;

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

●   Coherence and comparability – similar statistics published elsewhere and the degree in which the statistics can be compared over time.

Data sources, methodology and definitions

1. Passenger rail service complaints

Data sources

The complaints data contained within the passenger rail service complaints statistical release and data tables are sourced from administrative data submitted by train operators. Appeals data is sourced from passenger watchdogs - Transport Focus and London TravelWatch. National Rail Enquiries data is sourced from the Rail Delivery Group (RDG).

Train operators record information on complaints they receive within their own internal complaints management systems. ORR collects this aggregated data every rail period (i.e., every 4 weeks). In order to ensure consistency between train operators ORR issue via the website technical guidance and a standard data collection template.

Data governance

Train operators are obliged to provide certain information to ORR as part of their licence agreements known as Complaints Handling Procedures (CHPs). 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.

Train operators are required to officially sign-off that their data returns will follow ORR guidance, whilst also highlighting any data quality issues which may impact on this.

Methodology and definitions

The definition of a complaint:

The Complaints Code of Practice (section 1.12) defines 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."**

The table below lists following methods for train operators receiving complaints and if they are in-scope for submission of data to ORR:

Complaints	In scope?
Letter (including comment cards)	Yes
Email/Webform	Yes
Telephone Call	Yes
Meet the Manager	Yes
Online Forums (including live chat)	Yes
Another TOC's complaints	No
Delay compensation claims (Note below)	No
Feedback	No
National Rail Enquiries (NRE)	No
Praise (excluded from section B)	No
Social media (note below)	No
Transport Focus/London TravelWatch	No

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 a formal complaint. 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 ORR issues to train operators.

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 on 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 April to June and July to September. When the quarterly data was calculated for April 2023 to March 2024, six out of 28 days of the data were assigned to April to June (covering 25 June to 30 June) and 22 out of 28 days of the data were assigned to July to September (covering 1 July to 23 July). The breakdown of the calculations used for April 2023 to March 2024 are as follows:

Quarter	Calculation
1 April to 30 June 2023	Period 1 + Period 2 + Period 3 + 6/28 of Period 4
1 July to 30 September 2023	22/28 of Period 4 + Period 5 + Period 6 + 14/28 of Period 7
1 October to 30 December 2023	14/28 of Period 7 + Period 8 + Period 9 + 22/28 of Period 10
1 January to 31 March 2024	6/28 of Period 10 + Period 11 + Period 12 + Period 13

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 complaint rate is used as it enables fair comparisons between train operators and comparisons over time to be made. This is because comparing train operator complaint

volumes may be misleading due to the differences in passenger journeys each train operator carries out.

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 and methodology report for the [Passenger rail usage](#) statistical release.

The complaints rate was not published for April 2020 to March 2021 due to the impact of the pandemic on rail passenger usage, which meant that passenger journeys were not a suitable normaliser to calculate a reliable complaint rate for each operator. Please see the complaint volumes section below for further information.

Elizabeth line

Complaints rates for operators and the Great Britain total between April 2022 and June 2023 are marked as provisional, due to a technical issue in LENNON (see [Passenger rail usage](#) for more information). The technical issue resulted in overestimates for Elizabeth line passenger journeys, and consequently, underestimates for Elizabeth line and national complaints rates. From initial analysis using data provided by TfL (which is unaffected), the impact of the issue worsened from April 2022 to March 2023, as more services were introduced on the Elizabeth line. The overestimation of passenger journeys resulted in Elizabeth line complaints rates being underestimated by up to 26% for the first half of the year and by up to 66% for the second half. This consequently underestimated the national complaints rate by 4% for the whole year. Further information on the overestimates of usage on Elizabeth line can be found in the [Passenger rail usage](#). The data continue to be marked as provisional as further investigations are made.

Complaints by category

Each operator assigns categories to each complaint correspondence they receive. The complaint categories are based on 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 75 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.

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

The full list of complaint categories can be viewed within the following tables: complaint categories (table 4130) and complaint categories by operator (table 4133).

Response times to complaints

For each rail period train operators provide the ORR with the percentage of complaint correspondences they have closed within 20 working days. The CHP licence requirement is for train operators to close 95% of complaints within 20 working days. From April 2015 onwards, ORR also collected data on the percentage of complaints responded to within 10 working days and from April 2023 onwards, ORR has collected data on the percentage of complaints responded to within 30 working days. Between April 2015 and March 2023, ORR collected the percentage of complaints responded to within the operators' internal target.

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

> **The operator'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 response is not counted as part of the response time. 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.

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 e-mail/webform, telephone, letter, online forums, and 'meet the manager' sessions.

These figures show the relative frequency with which complaints are received by the different contact methods and does not consider the number of complaint topics covered within each correspondence. Note this is a change in methodology for the April 2016 to March 2017 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 January to March statistical releases but is still disaggregated on a quarterly basis.

Appeals to Transport Focus and London TravelWatch

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.

Appeals data are presented in the statistical release by train operators 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 operators when making their initial complaint, as well as the types of complaint that do not receive adequate initial responses.

National Rail Enquiries Service data

National Rail Enquiries, part of the Rail Delivery Group, 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.

This metric is only reported on an annual basis with the January to March statistical releases but is still disaggregated on a quarterly basis.

2. Delay compensation claims

Data sources

The data contained within the rail delay compensation claims factsheet and data tables are sourced from administrative data submitted by the train operators.

Methodology

As part of train operators' Core Data requirements, train operators provide information on delay compensation claims on a periodic (four-weekly) 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 collects 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.

Definitions

Volume of claims received

The volume of delay compensation claims that have been received in the period. At the time of publication this data is provisional and subject to change. This is because at the time of reporting if there were cases which were yet to be categorised as delay compensation claims, the train operator will revise the previous period's data to reflect the correct volumes received.

Volume of claims closed

The volume of delay compensation claims closed within a period. This may include claims closed within the period even if they were received in the previous period. If a delay compensation claim form contains several claims from a passenger, then each claim should be counted separately. For example, if a delay compensation claim contains two claims for delayed trips, then this should be counted twice within these statistics.

Volume of claims approved

The volume of delay compensation claims which have been approved within the period (i.e., the passenger's claim was successful). This is based on those claims closed within the period.

Percentage of claims closed within 20 working days

This is based on those claims closed within a period. For example, if 100 claims were closed in a period, the response time would be for those 100 claims closed.

The percentage of claims closed within 20 working days is calculated on when the claim was received by the operator to when the payment was issued for a successful claim, or when the claim was rejected for an unsuccessful claim.

Delay compensation data was first collected from train operators in April 2018 to March 2019. 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.

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.

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 scheme. Compensation may not be available if the delay is caused by an event outside the operator's 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 schemes and the number of passenger journeys, caution is to be taken when comparing between train operators and/or previous years in table 4410.

For the latest delay compensation schemes each train operators uses, please see the background information within the [delay compensation factsheet](#).

3. Passenger satisfaction with complaints handling

Data sources

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 an ORR commissioned survey about their experience of how the complaint was handled. M.E.L Research have conducted the survey since April 2022. Between April 2016 and March 2022, it was carried out by Critical Research.

The complainant is asked to rank their satisfaction with the outcome and various aspects of the handling of the complaint on a five point scale and, in some instances, to provide a qualitative response via an open text box. For the data presented in the accompanying data tables and the analysis presented in this factsheet, the response 'satisfied' refers to both satisfied and very satisfied, and 'dissatisfied' refers to both very dissatisfied and dissatisfied. Any 'don't know' responses have been excluded from the data. Complainants are also asked how the feel about the operator given the way they handled the complaint. For this question, the options are 'more positive', 'more negative', and 'no different'.

Results for all surveyed operators and the margin of error

As the number of responses to the survey vary by each operator, the data for all surveyed operators combined are weighted by complaint volumes (however, the train operator data in Table 4174 are unweighted). Weighting improves the representativeness of the combined results. The weights are produced by calculating an operator's percentage of overall responses to the passenger satisfaction survey and dividing by the percentage of all complaints that an operator is responsible for.

The following table shows the margin of error (95% confidence level) for the April 2022 to March 2023 results for all surveyed operators combined. The margin of error for each operator is available in the accuracy and reliability section of this quality report. As passenger satisfaction with complaints handling data are based on a survey, the margin of error provides a range within which the true result is expected to lie for the given the confidence level.

Margin of error, April 2022 to March 2023 survey

Question	Satisfied (%)	Margin of error (pp)
Q1) Outcome satisfaction	28.0%	+/− 0.5pp
Q2) Overall handling satisfaction	27.1%	+/− 0.5pp

Comparability of the time series

The mix of operators participating in the survey has varied over time. This should be considered when comparing results from different years. The table below details the total number of survey responses in each year of the survey.

Number of survey responses each financial year

Financial year	Number of responses
1 April 2016 to 31 March 2017	29,606
1 April 2017 to 31 March 2018	41,789
1 April 2018 to 31 March 2019	3,896
1 April 2019 to 31 March 2020	54,573
1 April 2020 to 31 March 2021	17,476
1 April 2021 to 31 March 2022	45,147
1 April 2022 to 31 March 2023	31,394

In the latest year, 9.6% of those who complained to participating operators took part in the survey (31,394 responses out of 325,731 complaints to the surveyed operators).

Inclusion of operators by railway reporting period

The survey was conducted by M.E.L Research for the first time in the year April 2022 to March 2023. They were unable to survey complainants at some operators until a number of railway periods into the year (see the table below for details). In the case of West Midlands Trains, no data are available for the whole year. London Overground and Elizabeth line have not participated in the survey since 31 March 2021.

Inclusion of operators in the survey, April 2017 to March 2023

Operator	Periods in the survey
Avanti West Coast	April 2017 to March 2018 Period 13 to April 2018 to March 2019 Period 13 April 2019 to March 2020 Period 7 and 8 April 2019 to March 2020 Period 10 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 4 to 13
c2c	April 2016 to March 2017 Period 3 to 8 and Period 11 and 12 April 2017 to March 2018 Period 1, 5, 6 April 2017 to March 2018 Period 8 to April 2018 to March 2019 Period 1 April 2018 to March 2019 Period 4 April 2018 to March 2019 Period 7 to April 2019 to March 2020 Period 1 April 2019 to March 2020 Period 4 to April 2022 to March 2023 Period 13
Caledonian Sleeper	April 2017 to March 2018 Period 3 to 6 and Period 8 to 12 April 2018 to March 2019 Period 6 to 11 and Period 13 April 2019 to March 2020 Period 3 to April 2020 to March 2021 Period 1 April 2020 to March 2021 Period 3 to April 2021 to March 2022 Period 11 April 2021 to March 2022 Period 13 to April 2022 to March 2023 Period 13
Chiltern Railways	April 2016 to March 2017 Period 6 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 4 to 12
CrossCountry	April 2016 to March 2017 Period 1 to

Operator	Periods in the survey
	April 2018 to March 2019 Period 13 April 2019 to March 2020 Period 3 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 9 to 13
East Midlands Railway	April 2016 to March 2017 Period 1 to April 2018 to March 2019 Period 13 April 2019 to March 2020 Period 5 to April 2020 to March 2021 Period 8 April 2020 to March 2021 Period 10 to April 2022 to March 2023 Period 13
Elizabeth line	April 2017 to March 2018 Period 11 to 13 April 2020 to March 2021 Period 1, 2 and Period 4 to 8 (Questions 1 to 4 only in April 2020 to March 2021) Elizabeth line have not participated in the survey since 31 March 2021
Govia Thameslink Railway	April 2016 to March 2017 Period 10 to April 2022 to March 2023 Period 13
Grand Central	April 2016 to March 2017 Period 1 to April 2017 to March 2018 Period 13 April 2018 to March 2019 Period 3 to April 2019 to March 2020 Period 13 April 2020 to March 2021 Period 1, 4 to 7, 9, and 10 April 2020 to March 2021 Period 12 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 4 to 13
Great Western Railway	April 2016 to March 2017 Period 7 to April 2017 to March 2018 Period 13 April 2018 to March 2019 Period 2 to 9 and Period 11 April 2019 to March 2020 Period 4 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 4 to 13
Greater Anglia	April 2016 to March 2017 Period 1 to April 2022 to March 2023 Period 10 April 2022 to March 2023 Period 13
Heathrow Express	April 2017 to March 2018 Period 6 to

Operator	Periods in the survey
	April 2018 to March 2019 Period 9
	April 2018 to March 2019 Period 11 to April 2019 to March 2020 Period 13
	April 2020 to March 2021 Period 1 and Period 3 to 12
	April 2021 to March 2022 Period 2 to 8
	April 2021 to March 2022 Period 10 to April 2022 to March 2023 Period 13
Hull Trains	April 2016 to March 2017 Period 1 to April 2017 to March 2018 Period 13
	April 2018 to March 2019 Period 2 and 3
	April 2019 to March 2020 Period 1 to 13
	April 2020 to March 2021 Period 1, 4, and Period 9 to 12
	April 2021 to March 2022 Period 1 to 13
	April 2022 to March 2023 Period 4 to 8 and Period 10 to 13
London North Eastern Railway	April 2016 to March 2017 Period 1 to April 2022 to March 2023 Period 13
London Overground	April 2016 to March 2017 Period 1 to 8
	April 2017 to March 2018 Period 11 to 13
	April 2018 to March 2019 Period 2
	April 2020 to March 2021 Period 1 and Period 3 to 8
	(Questions 1 to 4 only in April 2020 to March 2021)
	London Overground have not participated in the survey since 31 March 2021
Lumo	April 2021 to March 2022 Period 8 to 13
	April 2022 to March 2023 Period 4 to 13
Merseyrail	April 2016 to March 2017 Period 1 to April 2017 to March 2018 Period 13
	April 2018 to March 2019 Period 1, 3 and Period 10 to 12
	April 2019 to March 2020 Period 1 to 13
	April 2020 to March 2021 Period 2 to April 2022 to March 2023 Period 13
Northern Trains	April 2016 to March 2017 Period 1 to

Operator	Periods in the survey
	April 2017 to March 2018 Period 12
	April 2018 to March 2019 Period 1 to April 2022 to March 2023 Period 13
ScotRail	April 2016 to March 2017 Period 1 to April 2022 to March 2023 Period 13
South Western Railway	April 2016 to March 2017 Period 4 to April 2018 to March 2019 Period 13 April 2019 to March 2020 Period 11 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 6 to 13
Southeastern	April 2016 to March 2017 Period 7 to April 2022 to March 2023 Period 9 April 2022 to March 2023 Period 11 to 13
TfW Rail	April 2016 to March 2017 Period 7 to April 2018 to March 2019 Period 9 April 2019 to March 2020 Period 10 to April 2022 to March 2023 Period 13
TransPennine Express	April 2016 to March 2017 Period 7 to April 2017 to March 2018 Period 13 April 2018 to March 2019 Period 3 and Period 5 to 13 April 2019 to March 2020 Period 4 to April 2021 to March 2022 Period 13 April 2022 to March 2023 Period 4 to 8 and Period 10 to 13
West Midlands Trains	April 2016 to March 2017 Period 1 to April 2017 to March 2018 Period 8 April 2017 to March 2018 Period 10 to 13 April 2018 to March 2019 Period 2 to April 2019 to March 2020 Period 3 April 2019 to March 2020 Period 5 to April 2021 to March 2022 Period 13

Historical background

Prior to 2010:

The Department for Transport (DfT) were responsible for enforcement of the Complaints Handling Procedure Licence. As part of this DfT were responsible for the collection and quality assurance of complaints data from train operators, and ORR were responsible for publishing the data.

During 2012:

ORR took over responsibility from the DfT for the collection and quality assurance of complaints data from train operators.

April 2012 to March 2013:

ORR took over the responsibility for the Complaints Handling Procedures licence from DfT

April 2013 to March 2014:

Complaint categories were expanded to mostly align with the National Rail Passenger Survey.

April 2015 to March 2016:

Complaint categories on complaints handling and accessibility were expanded.

April 2016 to March 2017:

Complaint categories on delay compensation was introduced.

ORR issued new data collection guidance to train operators.

Passenger satisfaction with complaints handling survey published for the first time.

ORR published its first annual consumer report.

April 2018 to March 2019:

Complaint categories on accessibility were expanded.

The Rail Ombudsman started during November 2018.

April 2018 to March 2019:

Delay compensation statistics published for the first time.

Prior to 2010, the Department for Transport (DfT) was responsible for collecting complaints data from each of the franchised train operators 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 operators.

Since the transfer of responsibility for data collection and licences, ORR worked with the train operators to improve quality and the breadth of data collected on complaints handling. This included the collection of new complaint categories and further discussions on definitions and quality assurance on the data provided by operators.

In 2011, ORR was 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, 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.

During 2013 ORR took over the responsibility for the Complaints Handling Procedures (CHPs) and Disabled People's Protection Polices (DPPPs) (in 2019 updated to Accessible Travel Policies (ATPs)) from DfT. To monitor these licences, ORR agreed with the train operators a set of data to monitor compliance known as the submission of 'Core Data'.

In April 2015 to March 2016, the complaint categories for accessibility issues and complaints handling were further disaggregated into several 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 operators with Complaints Handling Procedures (CHPs) and Accessible Travel Policies (ATPs). For April 2016 to March 2017, further categories were added to monitor the volume of complaints received regarding delay compensation schemes. For April 2017 to March 2018, further accessibility complaint categories were added following consultation with the train operators.

Since June 2016, ORR has published an annual rail consumer report. The report focuses on the performance of train companies and Network Rail in the consumer areas ORR regulates. It also highlights the work that ORR has undertaken throughout the year to protect the interests of rail passengers.

Introduction of the Rail Ombudsman

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 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 cannot 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.

Relevance to users

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

Some of the users and uses of our complaints statistics are as follows:

User	Description of how the data may be used
Train operators	Train operators use their customer relations management systems to manage the handling and response to customer claims and delay compensation claims. Train operators use these systems to submit their complaints data to ORR. Train operators use the published data to make comparisons to other train operators and to provide transparency to their customers.
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. The published statistics provide 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.
"Inquiring citizen"	This group of users may want to access the data for unbiased facts on rail complaints and satisfaction. These users may want to use our interactive tools, infographics and clear high-level summaries to help make informed decisions.

User	Description of how the data may be used
Technical users	Technical users will often want to use the data published within our data tables. Data tables for all releases are available free of charge on the data portal.
"Information foragers"	These users will often want local data about their rail journey. They often want official data from reliable sources with a clear methodology they can trust. The data portal is presented by theme in order to see data organised in a structured way and therefore make it easily accessible.

User satisfaction

ORR's last user survey took place from mid-January to mid-April 2020. The aim of the survey was to gather feedback on ORR's new data portal; this includes statistical releases, data tables and other supplementary material. There were 42 responses to the survey. ORR created an implementation plan following the 2020 user survey.

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

Pausing the complaint while waiting for a response

For April 2020 to March 2021, we asked train operators how they currently use 'stop the clock'. Most of the responses we received stated that the main reason for putting the complaint on hold was related to complaints regarding specific journeys, where the customer did not include information about their journey which was needed to provide a full substantive response (e.g., when they travelled, what service they used). Other reasons included operators awaiting confirmation of the customers preferred compensation method (e.g., via PayPal, card or cheque) or evidence of tickets/receipts in order to pay out compensation.

We also asked the average time complaints were put on hold by operators. Of the operators who were able to provide an average, 80% provided an average of less than 5 working days (some of which also mentioned that some customers take much longer than this to reply - e.g., 28 working days in some instances). The highest average given was 15.9 working days.

Based on the responses we received, operators' use of 'stop the clock' ranged from as low as 0% to as high as 42% of all complaints.

Ending the use of stop the clock

Prior to 1 April 2023, operators were able to 'stop the clock' (STC) in the calculation of complaints handling response times. Where further information was required from the complainant, operators could pause the timer with it resuming when the information was received from the complainant. As of 1 April 2023, operators are no longer permitted to use STC. For further information on the process in place, please the core data guidance available on the core complaints data page.

The removal of STC from train operator complaint systems has required technical changes to be applied. For some operators, it was not possible to make all the necessary changes by 1 April 2023. The table below provides details of the use of STC prior to 1 April 2023 and the date on which operators ceased using STC.

Operator	Did they use STC before 1 April 2023?	When did they stop using STC?
Avanti West Coast	Yes	1 April 2023
c2c	Yes	Still in use as of 30 June 2023
Caledonian Sleeper	Yes	1 April 2023
Chiltern Railways	Yes	1 April 2023
CrossCountry	Yes	1 April 2023
East Midlands Railway	No	Not applicable
Govia Thameslink Railway	Yes	28 May 2023
Grand Central	Yes	28 May 2023
Great Western Railway	Yes	1 April 2023
Greater Anglia	Yes	25 June 2023
Heathrow Express	Yes	1 April 2023
Hull Trains	Yes	1 April 2023
London North Eastern Railway	Yes	1 April 2023
London Overground	Yes	1 April 2023
Lumo	Yes	1 April 2023
Merseyrail	Yes	1 April 2023
Northern	Yes	30 April 2023
ScotRail	Yes	25 June 2023
South Western Railway	Yes	Still in use as of 30 June 2023
Southeastern	Yes	1 April 2023
Elizabeth line	Yes	1 April 2023
TfW Rail	Yes	Still in use as of 30 June 2023
TransPennine Express	Yes	1 April 2023
West Midlands Trains	Yes	28 May 2023

Accuracy and reliability

The proximity between an estimate and the unknown true value.

Passenger rail service complaints and delay compensation claims

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: Train operators sign-off on meeting the requirements, identifying their processes for ensuring the robustness of the data supplied to ORR.

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.

London North Eastern Railway

London North Eastern Railway closed 4,753 complaints between 1 April and 30 June 2023. A technical fault meant that the operator did not know the dates on which 547 of these complaints were received. The fault was active between 27 February and 6 April, with the complaints logged in the system from 6 April onwards. All 547 complaints were closed within 20 working days of being logged in the system and all but four were closed within 10 working days.

The statistics presented in Table 4153 and in section four of this release include the 547 complaints for which the start dates are not known. The response times are measured from the point at which they were logged in the operator's system. The table below shows the proportion of complaints closed within 10, 20 and 30 working days for all complaints closed by LNER in the quarter and for complaints closed for which the start date was known (excluding 547 complaints without a known start date).

Response time	All complaints closed April to June 2023	Excluding 547 complaints without a known start date
Within 10 working days	83.0%	80.8%
Within 20 working days	97.8%	97.5%
Within 30 working days	99.0%	98.9%

Southeastern

Before 1 April 2023, data for Southeastern included some responses to complaints that had already been closed. It is estimated that such responses account for less than 10% of the total number closed by Southeastern and less than 1% of the number closed nationally. From 1 April 2023 onwards, data for Southeastern are limited to complaints closed.

Passenger satisfaction with complaints handling

The following table shows the margin of error (95% confidence level) for the April 2022 to March 2023 results for operators surveyed. As passenger satisfaction with complaints handling data are based on a survey, the margin of error provides a range within which the true result is expected to lie for the given the confidence level.

Train operator	Passenger satisfaction with complaint outcome responses, April 2022 to March 2023	Complaint volumes, April 2022 to March 2023	Net satisfaction for outcome of complaint (%)	Margin of error (pp)
Avanti West Coast	5,715	49,320	25.1%	+/− 1.2pp
c2c	532	4,918	25.9%	+/− 4.0pp
Caledonian Sleeper	160	1,015	44.4%	+/− 7.1pp
Chiltern Railways	206	3,061	17.5%	+/− 6.6pp
CrossCountry	99	7,710	33.3%	+/− 9.8pp
East Midlands Railway	1,950	18,164	29.9%	+/− 2.1pp
Govia Thameslink Railway	2,248	29,696	17.1%	+/− 2.0pp
Grand Central	136	2,150	44.9%	+/− 8.1pp
Great Western Railway	4,689	43,388	29.3%	+/− 1.4pp
Greater Anglia	1,964	12,968	30.2%	+/− 2.0pp
Heathrow Express	208	1,079	46.6%	+/− 6.1pp
Hull Trains	183	1,708	36.1%	+/− 6.8pp
London North Eastern Railway	2,946	28,014	44.7%	+/− 1.7pp
Lumo	289	2,628	32.5%	+/− 5.4pp
Merseyrail	221	1,349	16.3%	+/− 6.0pp
Northern Trains	1,912	15,787	24.2%	+/− 2.1pp
ScotRail	2,447	15,876	24.5%	+/− 1.8pp
South Western Railway	1,714	24,572	39.3%	+/− 2.3pp
Southeastern	1,355	27,853	29.2%	+/− 2.6pp
TfW Rail	768	17,330	19.9%	+/− 3.5pp
TransPennine Express	1,610	17,145	21.2%	+/− 2.3pp
All surveyed operators	**31,352**	**325,731**	**27.3%**	**+/− 0.5pp**

Note: not all of the 31,394 complainants surveyed this year provided a response to the complaint outcome question.

Elizabeth line, London Overground and West Midlands Trains were not surveyed in the latest year. Therefore, the total number of complaints shown in the table above (325,731) differs from the total number of complaints in Great Britain during April 2022 to March 2023 (346,758).

Response rate

The table below shows the response rate to the survey for all operators.

Financial year	Passenger satisfaction with complaints handling responses	Complaints closed	Response rate
April 2016 to March 2017	29,606	540,374	5.5%
April 2017 to March 2018	41,789	506,748	8.2%
April 2018 to March 2019	3,896	536,272	0.7%
April 2019 to March 2020	54,573	534,882	10.2%
April 2020 to March 2021	17,476	133,003	13.1%
April 2021 to March 2022	45,147	282,537	16.0%
April 2022 to March 2023	31,394	325,731	9.6%

Data coverage

The survey was conducted by M.E.L Research for the first time in the year April 2022 to March 2023. They were unable to survey complainants at some operators until a number of railway periods into the year. In the case of West Midlands Trains, no data are available for the whole year. London Overground and Elizabeth line have not participated in the survey since 31 March 2021. Network Rail complaints data is available within ORR's Annual Rail Consumer report.

Quality assurance

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 (four-weekly) quality assurance checks on all Core Data submitted by train operators. Any arising issues are raised with the data suppliers who must explain or correct the data, and then re-submit. Explanations from the data suppliers regarding data anomalies can be 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. A consultation with data suppliers is held every January where the operators can raise issues and give feedback on proposals for the next year's data

collection. 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, whilst also highlighting any data quality issues which may impact on this.

These data are then prepared for publication. The process includes quality assuring the tables and charts produced and providing supporting commentary regarding the key trends, methodology and quality measures. These reports are subject to peer review. The final stage of the quality assurance process is a sign off by the statistics Head of Profession confirming the data meets the quality standards and are fit for publication.

Revisions policy

ORR's statement on orderly release and revisions policy outlines ORR's revision policy. Details of any revisions are available in the revisions log. Further information on revisions and data series breaks can also be found in the data tables.

Timeliness and punctuality

Timeliness refers to the time gap between publication and the reference period. Punctuality refers to the gap between planned and actual publication dates.

At the end of each rail period, train operators are given 15 working days to provide their submission of Core Data to the ORR.

Once train operators submit their Core Data, ORR plan two weeks to quality assure it. Any issues are raised with the data suppliers who must provide valid reasons 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 data into quarterly data, as detailed in the methodology section above. This may mean in some cases the quarterly data cannot be calculated until 6 to 7 weeks after the end of the quarter. Generally, these statistics are published two to three months after the end of the quarter.

The publication schedule available on the data portal outlines the publication dates for National Statistics quarterly and annual statistical releases and other official statistics up to 12 months in advance.

ORR is committed to releasing its statistics in an open and transparent manner that promotes confidence.

Accessibility and clarity

Accessibility is the ease with which users are able to access the data, also reflecting the format in which the data are available and the availability of supporting information. Clarity refers to the quality and sufficiency of the metadata, illustrations and accompanying advice.

Statistics need to be presented in a clear and understandable form. All our rail statistics data tables can be accessed free of charge on our data portal. Commentary about the statistics and trends are provided in the statistical releases. Interactive dashboards (PowerBI) are also available.

Our data portal and its content meet the accessibility standards of the Public Sector Bodies Website Accessibility Regulations. We support our users by providing the information they need in a way that is clear and accessible. Our statistical releases use plain language, and any technical terms, acronyms and definitions are clearly defined and explained when this is appropriate, to ensure that the statistics can be used effectively. Our data tables are available at the highest level of detail that is practical and in accessible formats. All data tables are available in OpenDocument Spreadsheet (.ods) format. We can also provide data in csv format on request.

Please see our accessibility statement for further details, including any non-accessible content.

Data tables

All tables associated with these releases can be found under the Data tables heading at the bottom of the Passenger rail service complaints, Passenger satisfaction with complaints handling and Delay compensation claims pages.

Passenger rail service complaints

- Complaints closed by operator – Table 4100
- Complaints per 100,000 journeys – Table 4110
- Complaints per 100,000 journeys by operator –Table 4113
- Complaints categories – Table 4130
- Complaints categories by operator – Table 4133
- Complaints responded to within 10, 20 and 30 working days – Table 4150
- Complaints responded to within 10, 20 and 30 working days by operator – Table 4153
- Complaints by contact method and operator – Table 4143

- National Rail Enquiries telephone service – Table 4180
- Appeals closed by Transport Focus and London TravelWatch – Table 4160
- Appeals closed by Transport Focus and London TravelWatch by operator – Table 4163

Passenger satisfaction with complaints handling

- Passenger satisfaction with complaints handling (all surveyed operators combined) – Table 4170
- Passenger satisfaction with complaints handling by operator – Table 4174

Delay compensation claims

- Delay compensation claims – Table 4410

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.

Rail Ombudsman:

The Rail Ombudsman provide a service to help sort out unresolved customer complaints about service providers within the rail industry. The Rail Ombudsman publish quarterly statistical reports which show how many complainants have escalated their complaint to the Ombudsman.

Department for Transport:

The Department for Transport (DfT) have published compensation amounts paid by train operators to passengers since April 2009 to March 2010. The DfT figures are not directly comparable to statistics published by ORR as the DfT compensation figures also include discretionary compensation payments made following complaints of poor service. DfT have previously published research on rail delays and compensation.

National Rail Passenger Survey:

The NRPS provides a network-wide picture of passengers' satisfaction with rail travel. Before the pandemic, passenger opinions of train services were collected twice a year from a representative sample of journeys. The latest wave of the survey was published on 2 July 2020. NRPS has since been discontinued. A new Rail Customer Experience Survey is in development and due to launch in 2024.

Length of comparable time series

Passenger rail service complaints

Measures	Start of time series	Any break in time series
Complaints closed by operator (table 4100)	April 2016 to March 2017	From October to December 2016 (Caledonian Express only) From April to June 2023 (Southeastern only)
Complaints per 100,000 journeys (table 4110)	April 1998 to March 1999	From April 2015 to March 2016 From April 2016 to March 2017 (non-franchised only) From April to June 2023 (Franchised and GB only)
Complaints per 100,000 journeys by operator (table 4113)	January to March 2008	From April 2015 to March 2016 From April 2016 to March 2017 (Heathrow Express only) From April to June 2023 (Southeastern only)
Complaint categories (table 4130)	January to March 2008	Between January to March 2013 to January to March 2016 From January to March 2016
Complaint categories by operator (table 4133)	April to June 2010	Between January to March 2013 to January to March 2016

Measures	Start of time series	Any break in time series
		From January to March 2016
Complaints responded to within 10, 20 and 30 working days	April 2015 to March 2016	From April 2016 to March 2017 From April to June 2023
Complaints responded to within 10, 20 and 30 working days by operator (table 4153)	January to March 2008	From January to March 2016 From April to June 2023
Complaints by contact method and operator (table 4143)	April to June 2010	From January to March 2016
Appeals categories closed by Transport Focus and London TravelWatch (table 4160)	April to June 2014	
Appeals closed by Transport Focus and London TravelWatch by operator (table 4163)	April to June 2013	
National Rail Enquiries telephone service (table 4180)	July to September 1997	-

Delay compensation claims

Measures	Start of time series	Any break in time series
Delay compensation claims (table 4410)	April 2018 to March 2019	Apr 2020 to Mar 2021 Period 01 Apr 2022 to Mar 2023 Period 04

Passenger satisfaction with complaints handling

Measures	Start of time series	Any break in time series
Passenger satisfaction with complaints handling (table 4170)	April 2016 to March 2017	The mix of operators participating in the survey has varied over time (see chapter 3 for details).
Passenger satisfaction with complaints handling by operator (table 4174)	April 2016 to March 2017	Response numbers and railway periods covered (see chapter 3 for details) vary from year to year.