







## Complaints Handling Research

Report

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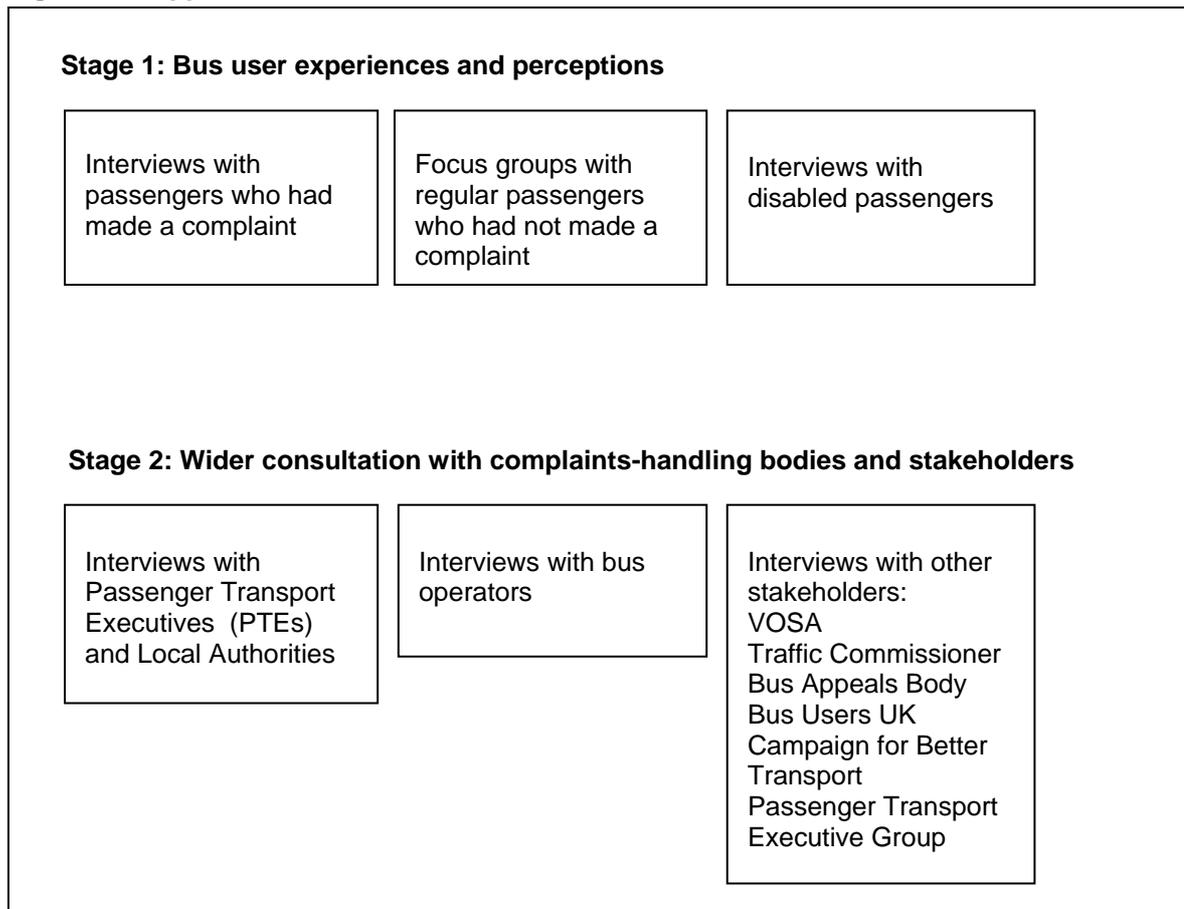
# 1 Introduction

- 1.1 Research was undertaken to investigate the bus complaints process in England (outside London). The research was commissioned by Passenger Focus to inform the development of the organisation's new role as an independent bus passenger watchdog.
- 1.2 The main focus of the research was to understand the current arrangements for handling bus complaints and the current passenger experience of making a complaint. To fully investigate this the following areas were explored:
- What information passengers are given about who to complain to and how
  - How complaints are responded to
  - What types of issues passengers complain about
  - Passenger understanding/knowledge of how to make a complaint
  - Passenger attitudes to making a complaint
  - Passenger experiences of making a complaint
  - Passenger and stakeholder opinion on options for reforming current complaints handling arrangements.
- 1.3 This report covers the roles of different complaints handling organisations including bus operators, local authorities, Bus Users UK and the Bus Appeals Body. The Vehicle Operating Standards Agency (VOSA) and the Traffic Commissioner also receive complaints about bus services (their role is outlined below) but they do not 'handle' them on behalf of passengers. For this reason they are not included in the scope of the report.
- 1.4 VOSA has a remit to receive complaints on a number of issues including route non-compliance, route timings and unregistered services. However, VOSA uses complaints information as intelligence to raise issues with operators and to target bus compliance investigations. In this way complaints information is used to bring about improvements in bus services but there is no mechanism for feedback to be provided directly to complainants. In this way VOSA plays a distinct and different role to other complaints organisations. Similarly to VOSA, the Traffic Commissioner uses complaints information received to target bus compliance investigations. If an operator is found to be non-compliant as the result of an investigation, then the Traffic Commissioner can penalise the operator. The Traffic Commissioners' focus is on monitoring and enforcing bus compliance, rather than responding to complainants on particular issues.

## Approach

- 1.5 The research began with a desk based search to determine what information passengers are given about who to complain to and how. This was done by analysing the websites of all local transport authorities, the five largest bus operators and a selection of smaller operators. This was followed up with phone-based research where the organisations were asked how passengers could make a complaint about a bus service.
- 1.6 We then engaged with representatives of the groups / organisations outlined in figure 1.1 in two stages. The first stage focused on exploring bus passenger perceptions and experiences of the bus complaints process. The second stage was to consult with a range of stakeholders who have regional and national remits and responsibilities within the complaints-handling process.

**Figure 1.1 Approach**



**Stage 1: Bus user experience and perceptions within the local context**

- 1.7 The research with bus passengers focused on their' experiences and perceptions of making a complaint, their main motivations for complaining, main causes of complaint and also barriers to making a complaint. This included exploring peoples' knowledge of how to make a complaint and their ideas on how the process could be improved.
- 1.8 Focus groups were used to facilitate discussion between regular bus users who had never made a complaint. One to one interviews were conducted to explore in detail the experiences of bus users that had made a complaint. Six regular bus users with disabilities were also interviewed. In total, four focus groups and thirty six interviews were conducted (thirty interviews with non-complainants and six with people with disabilities).
- 1.9 Sample areas for the research with bus passengers were chosen to represent a variety of bus operating environments:
- Herefordshire and North Yorkshire were selected to represent rural areas with a number of smaller operators and a high proportion of Local Authority supported services;
  - Birmingham and Sheffield were selected to represent PTE areas, the former with a dominant operator, and the latter with a Bus Quality Partnership;
  - Blackpool was selected to represent an area with an older demographic of bus users;

- Epsom was selected to represent an area where bus operators operate services within the Transport for London operating environment and outside of it in Surrey;
- Nottingham was selected to represent a non-PTE urban area where particular bus operators have a reputation for good customer service and complaints handling.

### **Stage 2: Wider consultation with stakeholders**

1.10 The organisations contacted for this phase of the research are listed above in figure 1.1. Face to face interviews were held with representatives of each organisation. When speaking to the stakeholder organisations we focussed on exploring their role in the complaints handling process and their ideas for improvements to the process locally and nationally.

## 2 Passenger understanding and knowledge of how to make a complaint

### What information is given to passengers about who to complain to and how?

- 2.1 A review of local authorities' websites and a sample of bus operators' websites was undertaken to establish what online information is provided to passengers on how to make a complaint. All of the thirty three local authority websites that were reviewed provided information on a general complaints procedure, which included the provision of a phone number, postal address and email address. Some authorities also used web forms for people to submit complaints. However these complaints procedures were generic; a channel for making a complaint about any council service. Only four local authorities provided information on how to make a complaint specifically about local bus services. Of these authorities, one instructed passengers to contact the bus operator in the first instance and then to contact Bus Users UK if they failed to get a response. One authority provided details of the Vehicle Operating Standards Agency (VOSA) as an organisation to take bus complaints to. Two authorities had a specific public transport complaints section on their websites. One of these specifically asked passengers to direct complaints to the local authority if the complaint was in relation to a council supported service; a web form was provided for feedback, together with the contact details for the Traffic Commissioner.
- 2.2 The sample of bus operators' websites included thirty two 'smaller' operators and sixteen 'larger' operators. Some of the larger operators' websites reviewed included multiple subsidiaries of the same company. All of the thirty two smaller operator websites provided a contact phone number for the operator. However, only thirteen provided specific details of a complaints procedure and provided multiple means of contacting the operator (phone, postal address, email address). Also, of the thirty two smaller bus operator websites that we reviewed, only one had a Code of Practice available online. Of the sixteen larger operator websites that were reviewed, ten outlined the process of how to make a complaint. Also, all of the larger operator websites provided company phone numbers, postal addresses and email addresses. All operators, large and small, had Conditions of Carriage available to view. However, these stated the operators' obligations rather than how they deal with complaints.
- 2.3 Overall, across both operator and local authority websites general contact information is widely available. However, specific information on the process of how to make a complaint about buses is less widely available.
- 2.4 In addition to the website review, the same organisations were contacted by telephone to find out what information was provided to callers on how to submit a complaint.
- 2.5 All of the local authorities contacted said that bus passengers could make a complaint to them by phone using a generic contact number for the council. Seven of the local transport authorities said that they publish leaflets and guides that explain how to make a complaint specific to buses. Ten authorities published complaints phone numbers on their bus timetables. One local authority explained that it prints information on how to make a complaint on bus passes, whilst another said it prints complaint forms for people to complete and send in.
- 2.6 The information provided by the local authorities on the telephone was varied with regard to who passengers should take their complaints to in the first instance. Some local authorities said that when they receive a complaint about buses they recommend that passengers take the complaint directly to the operator in the first instance. Other authorities said that they would deal with a complaint directly if it related to a subsidised service and some authorities said that they would investigate a complaint if the passenger had already taken it to the operator but had not got a

satisfactory response. Three local authorities said that they direct passengers with complaints about bus services to Traveline (Traveline do not handle complaints).

- 2.7 All of the smaller operators that were contacted by telephone explained that passengers could submit complaints directly to them either by telephone, email or post. Nine of the smaller operators said they publish leaflets and guides on how to make a complaint. Six of the smaller operators said that they print a complaints telephone number on their timetables. Eight of the larger operators contacted by phone explained that they print a contact phone number for complaints on their timetables and three said that they publish leaflets and guides that explain how to make a complaint. For both smaller and larger operators, not all of those contacted by telephone provide printed information on how to make a complaint.
- 2.8 During the telephone research operators were not asked whether they display a complaints phone number on their buses and none volunteered this information without prompt. From interviews that were undertaken with a small sample of large and small bus operators, evidence was collected to show that some operators do currently provide this information on buses. Two large operators and one small operator provide complaints phone numbers on their vehicles. Another smaller operator provides even more information on-bus by providing not only a phone number for complaints but also a named route manager to contact. Examples of both larger and smaller operators were found that provide comment cards on vehicles that people can fill in and then send to the operator (although it was explained that these are rarely used).
- 2.9 Overall, there is a mixed picture across the industry with regard to the provision of complaints information provided on vehicles. This is important because during a focus group held with bus passengers who had not made complaints about buses, the lack of information displayed on vehicles was raised as a barrier to making a complaint.

**Do bus passengers know to whom they can complain if they are not happy with local bus services? Do bus passengers know how to complain?**

- 2.10 During in-depth interviews with bus passengers who had made a complaint about bus services, the passengers were asked how easy they had found it to complain. Just under a third of complainants (11) said that they didn't know who to complain to initially and had to search to find out the contact details. After looking, most of these people found the phone number either on the operator's website or on a timetable leaflet. One person found the information on their bus ticket, one person asked a friend who to contact, one person looked up the operator's phone number in the phone book and one person looked up who to complain to using the PTE's website.
- 2.11 Over half (19) of the complainants found complaining easy or very easy and felt they knew who they should take their complaint to and how to complain. It is logical that a high proportion of the people who did make a complaint found it easy to do so because discussions with people who have had cause to make a complaint but chosen not to, indicated that in some cases a lack of information on how to pursue a complaint would prevent them making one. Of the people who had made a complaint, most (22) did so by phoning the bus operator, while a smaller number either wrote or complained in person to bus company staff.
- 2.12 During the focus groups, bus passengers who had not previously made complaints were asked who they would make a complaint to about bus services in the first instance. The most frequent responses to this were:
- The bus operator ('management' or 'head office')
  - The bus driver

- The Passenger Transport Executive (in areas where a PTE exists).

- 2.13 Non-complainants were then asked to think in more detail about who they would address complaints about particular issues to. The results of this are shown in table 2.2 (overleaf). These results show that passengers who have not previously complained would expect to take complaints about most issues directly to the bus operator. There is recognition among some passengers that issues around bus stop infrastructure and provision, and access to bus stops should be addressed to local authorities and PTEs. However, overall it appears that passengers feel it appropriate to take a wide range of issues to the PTEs. It was suggested by some people that complaints linked to personal safety and security should be addressed to the police. The idea of taking complaints to an ombudsman was raised a few times but no details were provided as to what organisation the ombudsman would be linked to. Traveline was suggested three times as an organisation to direct complaints to, even though it does not undertake this role.
- 2.14 Overall, it appears that bus passengers have a general awareness of who they should take their complaint to in the first instance (the bus operator) and how they should submit their complaint, even if they need to look up the contact details to do so. However, only a limited proportion of passengers have an awareness of where they should direct complaints that are outside of bus companies' control, such as bus infrastructure issues. Passengers have mixed views on who should deal with different types of complaint and very few passengers involved in the research knew who to contact or how to go about escalating a complaint if they weren't happy with the response from the operator.

**Table 2.1 Where non-complainants would expect to direct complaints on a range of issues**

Type of Complaint	Driver	Bus operator	Local authority	PTE	Police	Family / friends	Other passengers	Traveline	Equality commission	Ombudsman
Safety on bus	11	19	2	7	4					1
Quality of driving	16	18	1	6	2	1				
Route		14	4	10						
Early/late running buses	5	17	1	6						
Changes in service		15	2	11		1		1		
Facilitates for disabled	2	3	5	8					1	
Bus stop provision		4	5	10					1	
Vehicle access		7	2	6						
Vehicle cleanliness	4	9		4						1
Vehicle condition	2	6		6			1			1
Passengers behaviour	11	3		2	6					1
Information provision		4	1	9				1		
Fares/ticketing		6		7						
Seating availability (bus)	2	5		7	1	1		1		
Shelter provision		4	5	9						
Safety at stop	2	3	4	8						
Overall service	1	14	2	12						
Staff behaviour	5	18		6	1	1				1
Access to and at stop	1	11	10	9						

Note: Twenty six people provided answers for all twenty types of complaint; seven people provided answers for ten types of complaint, three people did not provide any answers. Participants were able to provide more than one answer per type of complaint.



### 3 Passenger attitudes to making a complaint

What expectations do passengers have of the process? Does this affect their attitude to making a complaint?

- 3.1 Bus passengers who had not made complaints were asked during the focus groups to explain their idea of a well functioning complaints system. The passengers explained that they would expect the following to be part of a good system:
- Good communication with a named person
  - A response by phone, letter or email
  - An apology where appropriate
  - Mechanisms for visible improvements to be made as a result of the complaint
  - Compensation where appropriate
  - For the complaint to be taken seriously.
- 3.2 These ideas contrast with what the non-complainants expected would happen if they did make a complaint about buses. At the focus groups non-complainants explained that the reasons why they had never made a complaint included the following:
- It feels too complicated to make a complaint
  - If you ring up to make a complaint you are likely to be put on hold
  - If you ring up, the right person to speak to is never there and you get passed from person to person
  - Information on how to complain is not displayed clearly enough; there is no information on the buses about how to complain
  - Lack of confidence in the process
  - Lack of confidence that anything would change as a result of the complaint
  - The lack of clarity around how to make a complaint.
- 3.3 These views are only perceptions; however, they demonstrate the dim view held by some passengers of the current complaints process.
- 3.4 The interviews with passengers who had made a complaint also indicate that the perceived lack of information and a lack of confidence in the process were barriers to the passenger taking the complaint further if they were not happy with the initial response. A third (10) said that they didn't know how to take their complaint further. A further third (10) said that they didn't see any point in pursuing the complaint. One explained that they thought it would be too draining and time consuming to pursue the complaint and another didn't want to take the matter further because they didn't want the bus driver to get into trouble.
- 3.5 The research shows that bus passengers have low expectations with regard to how their complaint will be handled and whether it will bring about improvements. This creates a barrier for some passengers to making complaints, and also escalating complaints if they don't get a satisfactory response in the first instance.

### **Are there other things that stop bus passengers complaining?**

3.6 Other barriers that prevented passengers making complaints were discussed at the focus groups with non-complainants. These included:

- Not wanting to make a scene by complaining to the bus driver
- Not wanting to complain about a small matter that seems trivial
- By the end of the day the problem doesn't seem so important
- Not wanting to upset the driver, in case it causes problems for future journeys.

## 4 What types of issues do bus passengers complain about?

### What do bus passengers complain about?

- 4.1 The complainants that we interviewed as part of this research had complained about the following issues:
- Staff behaviour (10 passengers)
  - Early / late running buses (8 passengers)
  - Bus not stopping (4 passengers)
  - Quality of driving (2 passengers)
  - Other passengers behaviour (2 passengers)
  - Safety at the bus stop (2 passenger)
  - Safety on the bus (1 passenger)
  - Overall service (1 passenger).
- 4.2 Passengers who had not made a complaint were asked what issues they would be most likely to complain about:
- Safety on the bus
  - Quality of driving
  - Staff behaviour
  - Early and late running buses
  - Vehicle condition.
- 4.3 In general, the likely reasons for complaint raised by non-complainants were similar those of the people who had made complaints, but non-complainants also raised safety as a particular issue that would prompt them to make a complaint.
- 4.4 During the interviews with local authorities and bus operators, we asked about the most frequent reasons for complaint that were received by the organisation. Both the local authorities and the operators were able to provide an overview of the types of complaints received, but there was variation in the detail of figures and categorisations of complaints that could be produced. One local authority provided specific figures on the number and types of complaints received about bus services; these had been recorded by officers in the passenger transport team. Other authorities could not provide detailed information because of the number of channels by which passengers are able to submit complaints to the organisation. For example, some local authorities use Customer Service Centres to deal with queries whilst also accepting complaints via the website and calls directly to transport officers. In these cases there is not always a joined up collation and categorisation process for all complaints specific to bus issues. In PTE areas, complaints information appears to be recorded and classified to a consistent, higher level of detail.
- 4.5 Similarly, whilst some operators have sophisticated complaints recording and categorisation systems, others do not record details of the complaints received.

- 4.6 The issues that the sample local authorities receive most complaints about are bulleted below. The themes are collated from detailed information provided by some authorities and the general impression provided by others:
- Early and late running buses
  - Staff behaviour
  - Service routing
  - Quality of driving
  - Fares and ticketing.
- 4.7 The issues that the sample operators receive most complaints about are given below. Again, the themes are collated from detailed information provided by some operators and the general impression provided by others:
- Early and late running buses
  - Staff behaviour
  - Quality of driving
  - Service routing
  - Information provision
  - Vehicle access
  - Seating availability
  - Shelters.
- 4.8 There is synergy between the issues that passengers want to complain about and the impressions / data that operators and local authorities hold on passenger complaints. However, there is variation in the approaches that different organisations take to recording and classifying complaints information.

## 5 How responses are made to complaints

### Who handles complaints from bus passengers?

- 5.1 Overall, among bus passengers there is a general awareness that complaints should be directed to bus operators. However, there is a lack of clarity for passengers over which organisations deal with issues that fall outside of the operators' remits. This is understandable given the differences in approach taken by different local transport authorities and PTEs with regard to their role in the complaints handling process.
- 5.2 Generally, in the first instance, passengers are encouraged to direct all complaints related to bus services to the operator. This gives the operator the opportunity to address the issue and try to achieve a satisfactory resolution with the passenger. All of the operators interviewed as part of the research also said that they value the opportunity to hear any comments or complaints before they are passed on to other organisations and they wish to retain this as part of the industry's complaints process. Some of the operators explained that they have been refining their internal complaints handling systems to make better use of the market intelligence that can be gained through complaints information.
- 5.3 The exceptions where it is appropriate for complaints to be directed to organisations other than the operators are where complaints revolve around highways issues and bus stop infrastructure. In these cases complaints need to be directed to the local authority. In some areas, local authorities also said they specifically welcome complaints and feedback about council-supported services. Similarly PTEs authorities have started to encourage bus passengers to provide all feedback and complaints to them, so they can monitor satisfaction with the transport network.
- 5.4 Between these varying scenarios there is scope for bus passengers to take their complaint to the 'wrong' organisation in the first instance, i.e. an organisation that is not responsible for the area of complaint. The research showed that in the sample areas, understanding has been developed between different local organisations with regard to referring on complaints that are the responsibility of someone else to resolve. For example, if an operator receives a complaint about a bus shelter they will either refer the complainant to the local transport authority or they will forward on the complaint and tell the complainant who they have forwarded it to. If a local authority or PTE receives a complaint about a bus service they will forward that complaint to the operator. In some cases the local transport authority will request to see the operator's response to the complainant and they will check that each issue is dealt with.
- 5.5 Although systems for referral of complaints were described by stakeholders in all of our sample areas, there is variation in whether passengers are asked to contact other organisations themselves, or whether the complaints are passed on, on their behalf. This may impact on the ease with which passengers can make a complaint and their perception of being passed around.
- 5.6 In terms of who within an organisation handles complaints, it varies. For smaller operators the designated person is the operations manager or the commercial manager, but this only comprises a small part of their remit. Larger operators are more likely to have dedicated teams or departments. In some cases, where a large operator has a national customer service team, staff within the local and regional bases are nominated to carry out local liaison. For local transport authorities, complaints are either handled by customer service centres or transport officers. PTEs have dedicated customer service teams.

- 5.7 The table below provides an overview of the remit of each complaints or appeals handling organisation. These remits have been determined through interviews with relevant parties and from published information.

**Table 5.1 Remits of organisations**

Organisation	Remit	Issue
Local Authority / PTE	<ul style="list-style-type: none"> <li>Highways issues</li> <li>Bus infrastructure (stops, bus stations)</li> <li>Bus information provision</li> <li>Issues relating to subsidised services</li> </ul>	Complaints
Bus Operators	<ul style="list-style-type: none"> <li>Service operational issues</li> <li>Timetabling, routing, fares</li> </ul>	
Bus Users UK	<ul style="list-style-type: none"> <li>To facilitate bus passenger feedback to operators and other bus industry stakeholders on service issues</li> </ul>	Appeals
Bus Appeals Body	<ul style="list-style-type: none"> <li>Service operational issues</li> <li>Service reliability</li> <li>Driver conduct</li> </ul>	

**Do bus operators have formal complaints procedures?**

- 5.8 During the interviews that were held with the five largest UK bus operators, details of their complaints procedures were provided. Three of the companies have recently upgraded their complaints handling procedures and policies in recognition that better use could be made within the industry of information provided through complaints. Across the companies these changes have included establishing new staff positions to oversee customer services and complaints handling, the development of dedicated customer services teams, the introduction of new software to record complaints and monitor their progress, and changes from established methods such as standard letters to more personalised responses.

- 5.9 Overall, during the interviews with operators variation was observed in the quality of complaints policies and procedures in use. This ranged from one end of the spectrum (sophisticated complaints recording and tracking systems, dedicated customer service teams involved in investigations, a published customer charter and clear policies for recompense) to the other end, where complaints are handled informally with no policy or procedure to follow and no guidelines for staff to use. From this it appears that there is little consistency across the industry with regard to the quality of complaints policies and procedures.

**How are complaints responded to?**

- 5.10 In spite of the many differences within the bus industry regarding how complaints procedures are advertised, monitored and implemented, there is a strong similarity in the way complaints are responded to (in the cases where they are).

- 5.11 Operators and local transport authorities alike assess complaints to check whether they hold the remit for the issue. If not, they will forward the complaint or refer the complainant to the responsible party. In general, the standard procedure as described to us, is to investigate the complaint and then respond to the passenger. If a passenger is unhappy with the response they receive and they take this up with the responding organisation, the matter will be escalated internally to try to resolve the issue. From our research it appears that a complaint will normally only be referred on to an appeals body if a resolution cannot be found between the organisation and the complainant.
- 5.12 The majority of operators and authorities we spoke to told us that they fully investigate and respond to all of the complaints that they receive. However, there appears to be a gulf between theory and practice. Thirteen out of the thirty complainants we spoke to had not even received a reply. There are variations in the means that organisations use to respond to complainants e.g. some will respond to an email with an email while others acknowledge an email by email but then respond by telephone or letter. There are also variations, especially between the large operators, in whether complaints are dealt with on a local, regional or national basis. A current major development in complaints handling that emerged through the research was the will of larger operators to move away from a 'standard letter' approach to dealing with complaints. The attitude of some of the smaller operators towards handling complaints is reflected in fact that they do not all have targets for dealing with complaints – instead they prefer to resolve issues as quickly as possible to retain their customers as passengers.

**Do operators and authorities monitor complaints handling performance?**

- 5.13 Some operators and authorities make contact with a proportion of complainants after their complaint has been resolved, to find whether they were content with the process. However, this approach is not widespread within the industry and little evidence was collected to show that operators and authorities are setting targets and monitoring complaints handling performance.

**Do bus operators and authorities have consistent policies on recording complaints?**

- 5.14 Across the industry there is variation in the way complaints information is recorded and also how the information is collated. Generally, the recording of complaints information within the industry is geared up to suit the needs of different organisations' management structures rather than to aid reporting of figures. Indeed, some operators choose not to share figures on how many complaints have been received for reasons of commercial sensitivity.
- 5.15 The research indicated that most local transport authorities receive complaints through a number of different channels including post, email and telephone. Some authorities use dedicated customer care centres that aim to deal with a complaint at first contact when phone calls are received. In these situations where a complaint is dealt with by a customer care centre and no further action is required the complaint may not be recorded. Where further action needs to be taken or a matter investigated then the complaint will be logged and sent to the appropriate officer. In parallel, complaints are also received directly by passenger transport officers by phone, letter and email, and in some cases complaints are received by the local authority website manager via online forms. In discussion with the sample local transport authorities (excluding PTEs), it was explained that in some cases the complaints received through all these different channels with regard to a specific issue (buses) are not collated and reported. The complaints recording systems in place focus more on tracking the progress of all complaints than collating data about specific issues.
- 5.16 In general, the PTEs use more in-depth complaints recording systems than other local transport authorities. All of the PTEs provided evidence that they record all comments and complaints that

are received; some also breakdown the numbers of complaints, compliments and information requests that are received. All of the PTEs record the breakdown of complaints received in terms of reason for complaint and the mode (e.g. bus, train or tram). The number of categories used to determine the reasons for complaint varies between the PTEs. Evidence was provided to show the number of the categories used and also reported on range up to around twenty one different categories. The PTEs provide reports to their internal committees on the number and types of complaints received.

- 5.17 There were differences in the way the operators that took part in the research recorded complaints information. Large and medium sized companies generally used software systems to record, collate and track complaints. Some operators explained that new systems are currently being introduced that put more emphasis on collecting complaints information so it can be used to target service improvements. Some smaller operators take a more informal approach to defining and recording complaints. This variation in the way that complaints are defined and recorded makes it difficult to capture the scale and nature of the complaints received by the industry.

**Do operators and authorities actively welcome complaints?**

- 5.18 Whether operators and authorities actively welcome complaints was not explored through the research. However, the varied approach to advertising of complaints procedures by different operators indicates that the industry may not ‘actively’ seek complaints as a whole. Some of the larger operators that were involved in the research provided information on either their current or developing research programmes that are aimed at collecting passenger satisfaction information. For some larger operators these research programmes include undertaking large-scale passenger satisfaction surveys and keeping in touch with customers via emails and newsletters etc).

- 5.19 One local transport authority involved in the research, that supports subsidised bus services, told us that it values complaints information provided by passengers because it helps to inform investment in these services. In order to encourage passengers to make complaints to them they print complaints information on the timetables that the authority produces. Also, the PTEs feel that they have a role to play in handling complaints and they encourage feedback from passengers through marketing. We do not have sufficient evidence to suggest whether this attitude is widespread across (non PTE) local transport authorities.

**Do operators and authorities set targets for complaints handling?**

- 5.20 Targets for complaints handling are set by some, but not all operators, local transport authorities and PTEs. Also, the targets are diverse across the industry. In general, targets tend to be time-based, relating to how long it takes for an organisation to respond to a complaint. Examples of the targets that are used by different organisations are outlined in the table below.

**Table 5.2 Targets set for complaints handling**

Type of organisation	Examples of complaints handling targets
Local authorities	<ul style="list-style-type: none"> <li>• Target for the authority to achieve a minimum rating of 65% satisfaction in the public transport annual satisfaction survey</li> <li>• Target for the authority to achieve a minimum rating of 70% satisfaction in the public transport annual satisfaction survey</li> <li>• Target to acknowledge a complaint within 7 days and resolve it within 14 days</li> </ul>

PTEs	<ul style="list-style-type: none"> <li>• Target to respond to all written responses with 10 days</li> <li>• Critical response target set for a complaint to be acknowledged in 2 days and resolved within 10 days</li> <li>• Target to send a letter of explanation and or resolution within 5 days</li> <li>• Target to respond to 75% of complaints within 15 days</li> </ul>
Small – medium operators	<ul style="list-style-type: none"> <li>• Use Transport for London Targets on complaints handling</li> <li>• Target to respond to a complaint within 7 days</li> <li>• Don't set targets, try to resolve all complaints as soon as possible to customer's satisfaction</li> </ul>
Large operators	<ul style="list-style-type: none"> <li>• Target of 10 days for a first response</li> <li>• Target of tailored responses to be provided within 10 days</li> <li>• Target of a 3 day response for all complaint</li> </ul>

Note: These targets were discussed at meetings and were the organisations' first reaction when asked about targets for complaints handling. This information has not been taken from customer charters etc.

5.21 Two local authorities explained that they do not monitor complaints handling satisfaction directly. Instead they use the annual local public transport satisfaction survey results as a proxy for passenger satisfaction.

5.22 During the research two operators and one PTE questioned the usefulness of complaints handling targets linked to timescales for responses because, in their view, understanding and monitoring whether a complaint has been resolved to a passenger's satisfaction is more important than how quickly the organisation responded. As a result of this view, some organisations contact samples of passengers who have made complaints to ask them how content they were with the process, but this was by no means the norm across the organisations included in the research.

**Are operators and authorities using complaints as an opportunity to investigate incidents, review procedures and improve services?**

5.23 Little evidence was provided to show that operators are using complaints as an opportunity to investigate incidents, review procedures and improve services. However, during the interviews with operators (large and small) a number claimed, unprompted, that they that they do (or will as part of new customer service procedures) investigate incidents and seek to make improvements as a result of complaints.

## 6 Passengers' experiences of making a complaint

### Do bus passengers find it easy to complain?

- 6.1 Of the thirty passengers that were interviewed who had made a complaint, eleven did not know who to complain to. Six of these eleven passengers also said that it was difficult to find out the necessary information to make a complaint. However, nineteen passengers involved in the research did know who to direct their complaint to and found it easy to find the necessary contact information. Lacking the information on how to make a complaint was cited at the focus groups made up of bus passengers who had not made complaints, as a barrier that would prevent them from making a complaint. This may explain why many of the actual complainants had a good knowledge of how to complain; this barrier did not exist.
- 6.2 Some of the passengers who had made complaints about bus services recounted particular difficulties that they had encountered when making their complaint. These experiences are listed below:
- One complainant informed us that he phoned in with his complaint immediately but had to write in the next day as well as the person he originally spoke to did not take the details correctly.
  - Another complainant told us that they contacted the bus company and were promised a response in 7 days but did not receive one and had to ring again.
  - One complainant said that they had to phone at which point they were told that their complaint had to be put in writing.
  - One complainant's call wasn't returned so she wrote a letter. This was not responded to either.
  - One complainant initially took her complaint to the information office at the bus depot. They could not help her however and so she went to the security office who pointed her in the direction of the inspector to whom she detailed her complaint. The complainant was passed around before being able to pass on her complaint.
- 6.3 At two of the four focus groups that were held with bus passengers who had never made complaints (Nottingham and Blackpool), it was suggested that having more information displayed on buses would make it easier for people to complain. These passengers explained that by the time you get home at the end of the day the problems you encountered don't seem so great so you don't bother to make a complaint. Whereas, if you had the information available to complain when the problem occurred you might be more likely to make your point. Of the passengers who were involved in the research and had made complaints, one did so via a feedback form found on the bus, another used information found on a leaflet on the bus to write in, and another rang the operator because the number was displayed in the vehicle.

### Is it easy for disabled people to complain?

- 6.4 During the research a small sample of disabled bus passengers were interviewed to gain their views on making a complaint about bus services. The sample included two people who were profoundly or severely deaf, two people with mobility impairments and two people who were registered as blind or partially sighted.
- 6.5 Five of these disabled passengers had never made a complaint about buses. One passenger who was profoundly deaf explained that she would be reluctant to try and make a complaint because from her experience of contacting operators to try to obtain travel information, she has little confidence in the ability of operators to deal with people with hearing problems. Three of the disabled passengers explained that they had never made a complaint before because they did not

think it was worth the time or the effort because they didn't think that it would result in improvements. The remaining disabled passenger who had never made a complaint explained that this was because she had not had cause to complain.

- 6.6 One disabled passenger had made numerous complaints about bus services to the local transport authority and he had escalated his complaint to the Traffic Commissioner when he felt that no improvement was made to the situation. In this case, the passenger was blind and his complaint was that he could not see buses approaching, so he could not hail them and they consistently failed stop to pick him up. The local transport authority worked on his behalf with the operator to find a solution; the authority provided him with Braille service number cards to use to alert the bus drivers. The passenger found that this still did not always work, so the local transport authority advised and assisted him in escalating his complaint to the Traffic Commissioner. As yet he has not received a response from the Traffic Commissioner. This passenger felt that it had been easy for him to make his complaints. The first time he complained he rang the council switchboard. Since then an officer at the council has retained responsibility for dealing with his complaints, offering continuity and assistance.
- 6.7 In summary, it appears that some disabled bus passengers feel that it would not be worth their time and effort to try to make a complaint because the benefits would not equal the effort taken. However, the one passenger who we spoke to who had made a complaint had found it relatively easy to do so.

#### **How quickly do operators and authorities respond to complaints?**

- 6.8 Passengers who had made complaints shared information during the research that indicated the timescales involved from the perspective of a complainant, the details are below:
- One complainant received an immediate response over the phone
  - Two complainants received an initial response after two days but then no further communication
  - One complainant received an automatic email response and an email of apology a week later
  - One complainant received an initial response within three days and then resolution of the complaint within fifteen days
  - Two complainants received a letter of apology in one week
  - One complainant received a response within ten days.
  - Two complainants received a letter of apology within two weeks
  - One complainant received a response within three weeks
  - Thirteen complainants never received a response.
  - Six complainants could not remember the timescales involved.
- 6.9 Other than the one passenger whose complaint was dealt with immediately over the phone, in all cases it took at least a week for responses to be made to complaints.
- 6.10 The sample size for the research is very small; however, thirteen complainants said they did not receive any response to their complaint at all. This is a large proportion of the complainants interviewed and highlights an important issue within the industry.

### How satisfied are passengers with the response they receive to their complaint?

- 6.11 It is important that there is an understanding within the bus industry of what elements of complaints handling procedures passengers value and appreciate. It is equally important that operators and local transport authorities understand what factors influence how satisfied passengers are with the way that their complaints are handled. This information needs to be obtained from communicating with passengers. In discussion with the thirty passengers who had made a complaint, it was clear levels of satisfaction were linked to receiving a response, getting an apology and feeling that improvements had been made as a result of the service.
- 6.12 The bus passengers who had made complaints were asked how satisfied they were with the outcome of the complaint. Of the thirty complainants that we spoke to nine were 'very dissatisfied' with the outcome and eleven were 'dissatisfied'.
- 6.13 Five of the thirty complainants stated that they were 'neither satisfied nor dissatisfied' with the outcome of their complaint. In all cases this was because although they may have got an apology, they could not see an improvement in the issue they had complained about. One of these passengers also said that although they weren't particularly happy with the response they received they didn't feel it was worth taking it any further.
- 6.14 Two of the complainants were 'satisfied' with the outcome of their complaint and one complainant was 'very satisfied'. These passengers were impressed because:
- They were able to speak to someone straight away about their complaint
  - They received an apology
  - They received free bus tickets.
- 6.15 Two of the complainants did not state how happy they were with the outcome of their complaint.
- 6.16 Through the focus groups, passengers who had not made a complaint about buses were also asked what had satisfied them when making complaints about other services. In terms of customer services, this has relevance to the way that bus complaints should be handled. The non-complainants suggested that they would be satisfied by the handling of a complaint if:
- The company accepted liability
  - They received a personal apology
  - They received a timely acknowledgement or response
  - The complaint was escalated to a manager quickly and on their behalf if necessary
  - They received compensation if appropriate.
- 6.17 As discussed previously in chapter three, the perception that making a complaint leads to no improvement can be a barrier for passengers. Also, many of the complainants cited this as the main reason that they were dissatisfied with the way their complaint was handled. This shows that it is crucial that passengers are given confidence that their complaints will be investigated and used to affect improvement to increase customer satisfaction.

## 7 Options for improving current complaints handling arrangements

### How do passengers want complaints to be handled?

- 7.1 All of the passengers involved in the research were asked for their ideas on how they would like their complaints to be handled and what improvements could be made to the current system. There were some ideas that were suggested by complainants and non-complainants alike. These are outlined below:
- Clearer information should be provided on whom to take complaints to. The system should be simpler with a readily advertised number and clear guidelines on how to complain. Information provided on buses would be welcomed.
  - Immediate acknowledgement and a timely response. Complainants should be given a reference number to enable them to track their complaints.
  - Responses should be more personalised and standard letters should be replaced. In general there should be better communication between organisations and complainants.
  - Complainants should not be passed between members of staff or organisations.
  - Complainants should be able to see a difference as a result of their complaint. Information should be published that illustrates the correlation between the number of complaints made and the improvements that have been made as a result.
  - Clear information should be easily available on how passengers can escalate their complaints if they are not satisfied with the response they are given. It was suggested that information should be provided explaining how to escalate complaints, for example on operator websites.
- 7.2 There were also some ideas provided by passengers who had made complaints that were not identified by those who had not made complaints and vice versa. The ideas specific to complainants were that bus drivers should be made more aware of the complaints procedure and that complaints should be handled with more understanding. Ideas specific to passengers who had not made complaints included wanting operators to accept liability for issues, wishing to receive an apology and receiving tickets for free travel as compensation where appropriate.

## 8 Appeals handling

### Who handles appeals where bus passengers are not satisfied with how their complaint has been handled?

- 8.1 The Bus Appeals Body and Bus Users UK are two organisations that passengers can take complaints to if they have already contacted the operator but are unhappy with the response they receive. Both of these organisations has a defined remit and will only deal with the issues of service operation.
- 8.2 The Bus Appeals Body and Bus Users UK work together when dealing with appeals that are received from passengers (the Bus Appeals Body is operated in partnership between Bus Users UK and the bus operators' trade association the Confederation of Passenger Transport). If a passenger is unhappy with the response they receive from an operator they can appeal to the Bus Appeals Body. Bus Users UK will then investigate the appeal and try to sort it out. If the issue cannot be resolved by Bus Users UK, then they will refer the matter on to the Bus Appeals Body.
- 8.3 In the case of complaints that have been taken to local transport authorities, but where passengers are not happy with the response that they receive, there are internal corporate procedures for escalating the complaint within the authority. All authorities have these procedures and the procedures are not independent of the authority. Exact procedures vary between authorities but typically complaints are escalated from officer level to investigation by the Chief Executive. Some authorities also have committees that will consider escalated complaints.
- 8.4 If a passenger is unhappy with the way that the complaint has been handled by the local transport authority there is scope for the complaint to be escalated to the Local Government Ombudsman. The ombudsman will consider how the complaint has been handled rather than seeking to resolve the complaint. If the Local Government Ombudsman finds that there has been maladministration then it will recommend changes that the authority should implement to put things right. However, the Ombudsman cannot make authorities follow their recommendations.

### Can bus passengers appeal about any issue if they are not satisfied with how their complaint has been handled?

- 8.5 The research has shown that, in general, organisations within the industry attempt to refer complaints to the organisation with the remit for each issue. This raises the question of which organisations are responsible for matters such as fares, ticketing and multi-modal interchange. Little clarity can be provided on this. It appears that in PTE areas, passengers can complain about multi-modal issues because the PTEs accept complaints on any element of the network. In other areas the pathway for this type of complaint is less clear. It is also unclear as to whether there is an organisation that passengers can appeal to about issues such as multi-modal travel, because this falls outside the remit of the Bus Appeals Body.

### Do bus passengers know to whom they can appeal if they are not happy with the way their complaint has been handled?

- 8.6 Through the research there was very limited awareness of any bus industry appeals organisations among the bus passengers. Twenty five out of thirty people who had made a complaint did not know who they could take their complaint to after the operator. Five of the thirty people could think of an organisation to escalate their complaint to, these included the PTE, the Traffic Commissioner and the local MP. One person said that the complaint should not need to be escalated beyond the operator because it is the operators' responsibility to resolve issues. Only one complainant had escalated a complaint, this was to the Traffic Commissioner. This passenger had not received a response from the Traffic Commissioner on the matter.

8.7 During the focus groups with passengers who had not made a complaint, passengers were asked who they would expect to take their complaint to if they were not happy with the response they received from the operator or local transport authority. The passengers' ideas are listed below:

- The highest authority, an MP or the Bus Commissioner
- Would keep trying the operator
- Could form a pressure group
- The operator should advise us on who to take the complaint to
- An organisation like Ofwat or Ofgen is needed
- Would send a letter to the local press
- Wouldn't know who to take the complaint to next
- Would forget about the complaint
- Would start using a different form of transport.

8.8 Discussions with operators indicated that they often only provide information to passengers on how they can appeal once they have done everything they can do internally within the organisation to resolve the complaint. Few local transport authorities provide information on bus appeals organisations. For example, only three local transport authorities provide information on bus appeals bodies on their websites. However, there is evidence that some authorities do try to promote this kind of information; for example, Herefordshire County Council has details of the Traffic Commissioner and Bus Users UK in its timetables.

**Do Bus Users UK and the Bus Appeals Body have policies or procedures for handling appeal? Are these published?**

8.9 The Bus Appeals Body and Bus Users UK do have complaints procedures that are published on their websites, along with contact details for making a complaint. There is also a Code of Practice available. Passengers are encouraged to send their appeals to Bus Users UK. Bus Users UK will then seek to address the issue. Where Bus Users UK cannot resolve an issue the case is referred on the Bus Appeals Body.

**Do Bus Users UK and the Bus Appeals Body set targets for handling appeals?**

8.10 Bus Users UK publishes an annual report on its website, which states how many appeals it and the Bus Appeals Body has handled over the course of the year and the outcome of these appeals. The Bus Users UK website provides information on targets that are set in relation to appeals handling. It states that complaints should be acknowledged and preferably dealt with by Bus Users UK in five working days. The Bus Appeals Body website states that the Body aims to take no more than eight weeks to reach a decision on appeals.

**Views on how appeals should be handled**

8.11 The idea of escalating complaints was explored with the passengers involved in the research. The passengers who had made complaints were asked what they thought a bus appeals body should be like and how it should handle appeals. In general, many of these passengers found it hard to understand the concept of an appeals body and how it would link to their complaint. Some of the complainants liked the idea of single overarching organisation to take very serious complaints to but they were unsure of what powers that organisation should have. Several people who had made complaints commented that any appeals body should be an independent entity. Two other complainants said that they didn't think that the appeals organisation needed to be independent

and that the role could be handled by a local transport authority or an operator. There was a strong feeling among complainants that it was the operators' responsibility to deal with complaints rather than the duty of another organisation, and one passenger said that introducing more complaints organisations (in addition to the operators) would confuse matters. Where complainants were able to suggest powers that an appeals body might have they felt that the appeals body should work in partnership with operators to improve services and should have the powers to reprimand operators for consistently poor performance.

- 8.12 At the focus groups, passengers who had not made complaints were asked for their ideas on how an appeals body should function and what it should be like. The ideas included having a single overarching organisation to take serious complaints to, having an appeals body with some power to bring organisations to account for the issues behind complaints, having an organisation with local understanding of the issues. At the focus groups, ideas of an ombudsman and a Bus Commissioner were frequently raised, but there was little awareness of who took these roles within the industry at present.
- 8.13 For all passengers involved in the research the idea of appeals bodies within the bus industry was very abstract and intangible, leading to difficulties for people trying to think about how these organisations should function or who should take on the role. No passengers suggested a specific organisation that should take on the role of appeals other than the Traffic Commissioner, the local transport authority or the operators. This is likely to reflect passengers' awareness of the current system.

## 9 Conclusion

- 9.1 Overall, there is great variation in the way that operators and local transport authorities handle complaints about bus services. This study has highlighted that at present there is no single view within the bus industry on what constitutes a complaint and there is no way of measuring the overall number of complaints being made. What is clear is that the number of actual complaints made is the 'tip of the iceberg.' Two key underlying factors exist: firstly, customer care and complaints policies are not a sufficiently central part of thinking for some organisations; secondly, bus passengers seem to have low expectations of bus travel accompanied by poor understanding of the bus industry and its operation.
- 9.2 Providers of services want to be the first port of call for complaints, but do not necessarily make it clear how passengers can make a complaint. Passengers merely want a straightforward process for complaints; one that is clearly set out as part of a credible customer care policy. They want a speedy and personalised response that mirrors their method of complaining, an acceptance of responsibility and some way of seeing that things change as a result. Improvements need to be sought to address these issues on behalf of bus passengers.

