



Handling complaints and appeals from bus passengers

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Executive summary

A1 *Scope and purpose of report*

A1.1 This report explains how Passenger Focus believes it can best contribute to an improvement in the way complaints, and appeals – where the passenger seeks to take the complaint further) – are handled by the bus industry in England (outside London).

A1.2 It is based on evidence from research commissioned from the independent agency JMP with bus passengers and stakeholders.

A2 *Key findings*

Publicity/Knowing how to complain

A2.1 Publicity varies between operators and local authorities. Most of the operators' conditions of carriage we have been able to see provide contact details for making enquiries, comments or complaints. Some have charters that refer to complaints.

A2.3 Perhaps unsurprisingly, those who had made a complaint did not have significant difficulties in finding out how to get hold of the operator. Not knowing how to complain is a significant factor in discouraging passengers from complaining.

A2.4 Some of the major operators put conditions of carriage and customer charters/guarantees on their website, but many do not; some make them available in depots and travel shops. The prevailing culture appears to be not to actively encourage complaints, although some operators and local authorities do so.

A2.5 In general, operators do not place more than a few lines about how to complain on their websites, although there are some notable exceptions, such as Metrobus. The Confederation of Passenger Transport's (CPT) *Code of Best Practice on Customer Suggestions and Complaints*, though limited, is welcome. However, the level of awareness of the detailed provisions of the Code amongst operators is unclear.

A2.6 All local authorities provided information on how to complain on their websites. 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 bus issues.

A2.7 Passenger Transport Executive (PTE) websites are easiest to navigate. Some references are very brief; other PTEs provide more extensive information on how complaints are handled.

Recording complaints

A2.8 There is little consistency between local authorities in how complaints are logged, recorded and referred to other organisations. This appears also to be true of operators. In most cases the local authorities receive complaints

through a variety of channels, e.g. customer contact centres, websites, councillors, direct calls to the transport department. This can influence the way the complaint is dealt with and whether or not it is recorded.

- A2.9 Across the bus industry there is a wide variation in the way complaints are recorded. PTEs tend to have more in-depth recording systems. Some operators were reluctant to let us see figures for the number of complaints they have received; some authorities were unable to supply figures.
- A2.10 Rough estimates from our research suggest that the actual number of bus complaints is likely to be a mere fraction of the 55 per 100,000 journeys received by the rail industry.
- A2.11 Recording systems, where they exist, tend to have been introduced to help monitor performance against turnaround targets, rather than as a management tool to capture issues of rising concern. Local authorities generally have more sophisticated systems; their adoption of similar software packages should facilitate consistency.

Encouraging complaints

- A2.12 A small minority of complaints procedures actively encourage people to complain.
- A2.13 Typically, the contact details provided by operators are presented as general information enquiries rather than a specific complaints contact.
- A2.14 Only a small number of operators and authorities appear to be actively welcoming complaints or providing training for staff in complaints handling.
- A2.15 Some passengers find it difficult to complain and would value a wider range of mechanisms for submitting their complaints.

Barriers to complaining

- A2.16 Some operators' websites included addresses for correspondence and/or phone numbers and/or email addresses, but there was little consistency of approach. More people complained by telephone than by letter, email or in person combined. The requirement to write letters can be a barrier for some. It can also be hard to get through to the right person at the bus company on the phone.
- A2.17 Complaining should not be too complicated. Some complainants called for comment cards to be made available on buses and asked to be able to text their complaints.
- A2.18 Passengers quickly become frustrated when they are passed from pillar to post. Complainants felt they should be given the name of the person handling their complaint and a reference number.
- A2.19 Complaints can be hampered by passengers' inability to provide details of vehicle registration or other defining numbers, which is not helped by the way some of this information is displayed.

A2.20 Barriers reported by passengers include the fear of spending too long “wrapped up in the complaints process” or reluctance to cause a scene on the bus.

A2.21 Passengers may also be reluctant to complain if they fear that they will be victimised for doing so or if they are concerned that their personal information may be passed on to others without their consent.

Satisfaction with complaints handling

A2.22 Our researchers spoke to 30 passengers who had made complaints: 14 of these were not satisfied (8 “very dissatisfied” and 6 “dissatisfied”) with the way their complaint had been handled. Thirteen did not receive a response at all; others were dissatisfied because nothing changed as a result of the complaint. Only 3 out of 30 complainants were satisfied.

Setting targets and reporting performance

A2.23 Targets are not commonly published. There is little evidence from our research that speed of response to complaints is generally monitored. There is less evidence still that operators and authorities monitor satisfaction with their complaints handling.

Investigations and replies

A2.24 Complainants received a variety of responses, including apologies over the phone, letters of apology or explanation and, in two cases, free tickets. They called for swift acknowledgements and apologies, compensation, for someone to listen to them and be held accountable, and for improvements to prevent the problem from happening again.

A2.25 There is little evidence that operators are using complaints as an opportunity to investigate incidents, review procedures and improve services.

A2.26 The use of standard letters supports the impression that, all too often, complaints have not been properly investigated. Complainants told our researchers that they wanted to receive personalised letters rather than standard ones, and that they would like to see bus operators highlighting how the company is using the complaints received to make improvements.

A2.27 Passengers found the quality of complaints handling by the bus industry to be patchy, with many complaints not responded to at all.

Appeals

A2.28 Discussions with operators indicated that they often only provide information to passengers on how they can appeal once they have done everything they can to resolve the complaint themselves. Few local transport authorities provide information on bus appeals organisations.

A2.29 Only five of the 30 people our researchers spoke to who had made a complaint could think of an organisation to escalate their complaint to, while ten said they did not know how to take their complaint further. Another ten said they did not see any point in pursuing the complaint.

- A2.30 We do not as yet have conclusive, independent evidence about the effectiveness of BUUK and the BAB. BUUK claim to have resolved 95% of the cases that came their way to the satisfaction of all parties without needing to refer the complaint to the BAB. However, in the absence of an independently conducted satisfaction survey, it is impossible to verify whether all of these passengers were genuinely satisfied or whether some ‘threw in the towel’ seeing no prospect of a resolution.
- A2.31 Our researchers spoke to a number of complainants who decided not to pursue complaints to the appeal stage. In some cases this was because they did not know how to do so. Others felt it was not worth the trouble.
- A2.32 Some passengers feel an appeals body needs to be independent, but others disagree. Our research findings were inconclusive on this point.

A3 *Recommendations*

- A3.1 Recommendation 1: If all complaints are to be sent in the first instance to the operator, a protocol should be established between the various parties to pass correspondence quickly to the most appropriate body, to inform the passenger as to who is dealing with their complaint and to copy in interested parties for information.
- A3.2 Recommendation 2: We agree with the Government's proposal that operators should display notices about how to complain on all of their buses. However, we would like operators and local authorities to go further. All transport and traffic authorities should provide contact details for complaints on their websites. All bus operators with websites should do the same. The details should include a phone number, an email address (where one exists), as well as a postal address. Details of how to complain should also appear on bus stops, where feasible, and at bus stations.
- A3.3 Recommendation 3: All operators with a website should place conditions of carriage on it or in staffed offices.
- A3.4 Recommendation 4: All operators and local authorities should be required to establish a complaints procedure. Passenger Focus will discuss model complaints procedures with the industry.
- A3.5 Recommendation 5: Operators and authorities should regard any expression of dissatisfaction as a complaint, and should endeavour to keep a record of all complaints so defined.
- A3.6 Recommendation 6: The Government should require operators to report annually on the number of complaints they received.
- A3.7 Recommendation 7: Passenger Focus will work alongside operators and authorities to help them to identify a sufficiently wide range of categories to facilitate effective analysis.
- A3.8 Recommendation 8: All local authorities and operators should state in their publicity that they actively welcome complaints.

- A3.9 Recommendation 9: Operators and authorities should ensure that it is always be possible to make a complaint over the phone (although in some cases it may be necessary to follow-up in writing, e.g. where compensation is claimed)
- A3.10 Recommendation 10: Complainants should be given the name of the person taking responsibility for their complaint, and a reference number.
- A3.11 Recommendation 11: Information which passengers may need to quote in pursuit of their complaint should be clearly displayed on the bus.
- A3.12 Recommendation 12: Under no circumstances should an operator be able to charge premium rates or numbers through which they make a profit. We favour a low-rate tariff (local rates). In setting the number, we are mindful that many mobile phone tariffs exclude the national 08xx lo-call numbers. So what should be a cheap call turns out to be very expensive. Operators should take this into account when providing a contact number.
- A3.13 Recommendation 13: Operators and authorities should include a confidentiality statement in their consultation policy.
- A3.14 Recommendation 14: Operators and authorities should acknowledge complaints promptly when they come in, particularly where a substantive response cannot be sent immediately. Where a response cannot be sent within the published timescale, or in any event within 20 days, the complainant should be kept informed of progress and told when they should expect a response
- A3.15 Recommendation 15: Complaints handling should be regarded as a service, rather than simply an activity. Operators and authorities should systematically ask those who complain how satisfied they were with the way their complaint was handled, and use feedback to improve their complaints handling service. And they should publish the results of complainant satisfaction surveys.
- A3.16 Recommendation 16: The Government should require operators to report annually on, the speed with which they handled their complaints. This could be included in local authority contracts with operators.
- A3.17 Recommendation 17: The Government should require operators to report annually on any action taken as a result of receiving complaints.
- A3.18 Recommendation 18: All operators and local authorities should make it their policy to try to ensure that when they get something wrong the remedy they offer is, as far as possible, what people want.
- A3.19 Recommendation 19: In our response to the consultation on the proposed EC Regulation on passengers' rights, Passenger Focus supported the idea of an obligation on operators to set up a complaints procedure and to respond to complaints within 20 days, enforced by the Traffic Commissioners. Operators should also be required to publish an annual complaints report, a duty which should be enforced by the Traffic Commissioners. We believe that all of our other recommendations can best be achieved at this stage by our working alongside operators and authorities, encouraging them to develop best practice.

- A3.20 Recommendation 20: In the Government's consultation, the proposed Regulation 5 would require operators to provide contact details for appeals if passengers are not satisfied with the way their complaint has been handled. We support this proposal. The Traffic Commissioners should be asked to enforce this requirement. We suggest that, in the first instance, the Department discusses with the Vehicle Operating Standards Agency (VOSA) a practical way of handling enforcement of this Regulation.
- A3.21 Recommendation 21: All bodies handling bus appeals should publish their policies and procedures for handling appeals. First stage complaints handling bodies should make reference to the existence of policies and procedures when alerting complainants to their right to appeal, and to advise them how they can obtain a copy.
- A3.22 Recommendation 22: All bodies handling bus appeals should keep a record of all appeals and report annually on the number they received.
- A3.23 Recommendation 23: Appeals handling bodies should report annually on how quickly they have dealt with appeals and what action was taken as a result of them.
- A3.24 Recommendation 24: The Bus Appeals Body should carry out satisfaction surveys of appellants and publish the results. Other appeals handling bodies should also consider doing so.
- A3.25 Recommendation 25: The Bus Appeals Body should expand its remit to include all bus appeals.

Handling complaints and appeals from bus passengers

1 Purpose and scope of report

- 1.1 Complaints matter. Engaging with your customers offers a great opportunity to learn about what matters to them and increase their satisfaction with your services.
- 1.2 Improving the way that complaints are handled in the bus industry is one of Passenger Focus' top priorities. So one of the first things we did when the bus side of our operations was established in shadow form late last year was to commission the independent agency JMP to conduct research into complaints handling in the bus industry.
- 1.3 The research, which applies to England only (outside London) looked both at first-stage complaints and also appeals, and covers complaints to operators, local authorities, the Traffic Commissioners, Bus Users UK and the Bus Appeals Body.
- 1.4 JMP has produced a detailed report on the research they carried out and their findings, and this is available separately.
- 1.5 In July 2009 the Government published a consultation document on the extension of the remit of Passenger Focus to bus and coach issues and the requirement to display information about how to complain. The consultation specifically asks about the role that Passenger Focus should play in handling complaints.
- 1.6 This report, which draws on the evidence from the JMP research, explains how Passenger Focus believes it can best contribute to an improvement in the way complaints and appeals are handled.

2 Scope of research

- 2.1 JMP's research covered the following broad areas:
 - Passengers' attitudes to complaining
 - Knowing how to complain
 - Issues passengers complain about
 - How complaints are handled
 - How to improve complaints handling

3 Methodology

- 3.1 There were four principle strands to the research:

- Desk research: a website analysis of all local transport authorities, the five largest bus operators and selection of smaller operators; and follow-up phone calls.
- Focus groups of bus passengers who had never made a complaint (Nottingham, Blackpool, Sheffield, Birmingham)
- Depth interviews of bus passengers who *have* made a complaint (in the above areas and *also* in Surrey, Herefordshire, North Yorkshire)
- Face-to-face interviews with stakeholders, including the PTEs

Improving the handling of complaints and appeals

4 Complaints

- 4.1 In this report, the term ‘complaints’ refers to as any initial expression of dissatisfaction by passengers with the bus industry.

Why should operators and authorities take complaints handling seriously?

- 4.2 Engaging with your customers offers a great opportunity to learn about what matters to them and increase their satisfaction with your services. Evidence suggests that a satisfied complainant will tell many people about their positive experience. Research conducted for the Office of Fair Trading shows that 70% of customers will take their business elsewhere if they are dissatisfied with a product or service and do not complain, whereas 75% of customers will remain brand loyal if they complain and their complaint is resolved satisfactorily (Consumer Loyalty 1990).
- 4.3 The Citizen’s Charter initiative launched in the 1990s acted as a catalyst for improving complaints handling in the UK, with Government conducting detailed research into the attitudes and experiences of the public; pulling together examples of best practice in complaints handling from across the public and private sectors; and incentivising improvements through Chartermark awards.

Who handles complaints from passengers? Who *should* handle them?

- 4.4 A complaint is often defined as ‘any expression of dissatisfaction’. It can apply to infrastructure as well as services.
- 4.5 Complaints should be distinguished from policy representations: the former can be characterised as ‘failing to do things right’; the latter as ‘failing to do the right things’. Local authorities and ITAs/PTEs are responsible for setting the policy agenda through their local transport plans, determining how much they invest in bus services and how they allocate that investment.
- 4.6 Operational responsibility for bus services is divided between bus operators, local transport authorities and local traffic authorities.

- 4.7 Bus operators handle complaints about operational performance, including: delays and cancellations; tickets and passes; bus boarding; seating and space for luggage; wheelchairs and buggies on bus; temperature on bus; cleanliness inside bus; condition of interior and exterior of bus; security on bus; smoothness of ride; avoidance of collisions; information about disruptions, rights & responsibilities and performance.
- 4.8 Local authorities handle complaints about: getting to the bus stop; comprehensive network of routes and services; congestion and bus priority measures; concessionary fares and issuing of concessionary passes; bus stop design, lighting; seating and shelter at bus stops; cleanliness and condition of bus stops; security at bus stops; locations of stops, modal integration, ease of interchange; integration of fares, tickets and timetables; integrated information and redress.
- 4.9 Responsibility for handling some types of complaint depends on whether they relate to services which are provided commercially or on a tendered basis.
- For example, local authorities handle complaints about frequency of service and journey times for council subsidised services; but complaints about commercial services will be addressed by the operator.
 - Some bus stations are owned by bus companies, e.g. the bus stations in Ipswich and Bedford. This means that First and Stagecoach are responsible for complaints about these bus stations, e.g. cleanliness, facilities, security, staffing. Where the local authority owns the bus station, they will be responsible.
 - In some areas, local authorities are responsible for producing information about the network, routes and timetables, but in other areas bus operators choose to produce all of their own materials including bus stop information, so in these cases it would be more appropriate for the operator to handle complaints about their own materials. However, if a passenger were unhappy with the level of information provided by the operator, they could complain to the local authority.
 - PTEs encourage passengers to take complaints to them about all issues. However, local authorities will not normally handle complaints about fares and ticketing unless the complaint is about a council subsidised service. Complaints about fares on commercially run services should be directed to the operator.
- 4.10 Vehicle Operating Standards Agency (VOSA) handles complaints about operators not running registered routes, running unregistered services, anti-competitive behaviour, punctuality and driver conduct, although it only uses them as “intelligence” – it does not respond to the passenger. Complaints about anti-competitive behaviour can also be made to the Office of Fair Trading, who may pass them on to the Traffic Commissioners.
- 4.11 Passengers may find it hard to understand the precise division of responsibilities between different complaints handling bodies. Bus operators will generally pass complaints about routes and fares to the local transport authority if the complaints relate to council-subsidised services or if the complaint is about lack of service or a reduction in service and the operator

refers it to the local authority so that they can consider whether they wish to introduce a subsidised service. They will also pass on complaints about council-produced timetables, congestion and council-owned infrastructure such as bus stops. Some services are run on a commercial basis during the daytime on weekdays but are supported by the local transport authority in the evenings and at weekends.

- 4.12 Passengers' difficulties are likely to be compounded if the bodies themselves are unclear about where their responsibilities start and finish or if they share responsibility for sorting out the same problem. We have an example of a local authority apparently unaware of its own responsibility for maintaining bus shelters or installing new ones.
- 4.13 The Government's consultation document *Extension of the remit of Passenger Focus to bus and coach issues and the requirement to display information* proposes that operators would be required to display their name and details of where any complaints or comments should be sent. This keeps things simple for the passenger and is therefore sensible. However, complaints may need to be passed to the local authority if they concern matters such as routes, timetables, service levels, concessionary fares, stops and stations, bus priority measures and information.
- 4.14 It is in the passenger interest for complaints to be handled by the body best placed to do so and for information to be shared as widely as possible between interested parties. For example, local transport authorities may wish to monitor complaints about tendered bus services to help them decide what to do when contracts expire.
- 4.15 Recommendation 1: If all complaints are to be sent in the first instance to the operator, a protocol should be established between the various parties to pass correspondence quickly to the most appropriate body, to inform the passenger as to who is dealing with their complaint and to copy in interested parties for information.

What publicity is given to complaints avenues? 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?

- 4.16 Our research suggests that publicity varies between operators and local authorities. Most of the operators' conditions of carriage we have been able to see provide contact details for making enquiries, comments or complaints. Some have charters that refer to complaints.
- Trent Barton and Epsom Coaches both display complaints information on buses, on timetables, at stops and on their website. In general, there is little information on operators' websites about how to complain. Some of the smaller operators (e.g. Sergeants, Procter's Coaches) appear to do nothing to actively tell their passengers to whom they should complain.
 - All local authorities' websites publish contact details on to whom to complain. Only Nottinghamshire has complaints information both on its website, its timetables & its buses, and on its stops.

- Publicity on how to complain is most commonly found on bus timetables and websites, rather than stops and stations. Our research found that “on-board comments cards are supplied by some operators (e.g. Transdev and Arriva) and some PTEs but their current use and effectiveness is limited”.
- 4.17 Perhaps unsurprisingly, our research amongst those who had made a complaint indicates that they did not have significant difficulties in finding out how to get hold of the operator. Not knowing how to complain is a significant factor in discouraging passengers from complaining.
- 4.18 There is little evidence about passengers’ awareness of how to complain. Our research found that two thirds of the complainants interviewed felt that it was either easy or very easy to find information on how to complain; six found it difficult. However, the numbers are not statistically significant and we didn’t talk to those who hadn’t made a complaint. Only a small number of complainants realised they could take their complaint to the council or PTE.
- 4.19 The Government’s consultation document proposes that all operators should be required to display a notice on every bus with their name and details of where any complaints or comments should be sent.
- 4.20 It also asks if providers of bus stops and bus stations should also be required to display information telling passengers how to complain. As the consultation document makes clear, sections 139 and 140 of the Transport Act 2000 leave the best way of meeting local bus information needs to the discretion of local authorities.
- 4.21 Passengers may wish to complain about bus facilities, such as bus stops and bus stations. In these instances, complaints should be properly directed to the local transport authority. They may also wish to complain if their bus does not turn up, since they will not be on the bus to see the operator notice.
- 4.22 In principle, we would support the idea of requiring local transport authorities to provide information about how to complain at the bus stop and at the bus station. However, some thought needs to be given as to what information should be displayed, and the practicality of displaying it.
- 4.23 Asking passengers to send all complaints to the operator, who then copies and forwards them to the local authority as appropriate, has the virtue of simplicity and consistency, as noted above. If this approach is adopted, the operator’s name and contact details should appear on bus stops and at bus stations. Where bus stations are used by many different operators, careful thought will need to be given about how to display the information to fit it into the bus stop display and to avoid confusing the passenger.
- 4.24 Alternatively, providing the contact details of the local authority for complaints about bus stops and shelters has the virtue of getting more complaints to the most appropriate body first time. However, without very careful handling, it is likely to exacerbate the risks of confusion highlighted above.
- 4.25 The Confederation of Passenger Transport (CPT) has developed a *Code of Best Practice on Customer Suggestions and Complaints* (see below). The Code states that:

“Operators should ensure that where possible all relevant vehicles carry an internal notice giving the name of the designated official in the operator’s organisation and the address to which complaints should be sent, together with contact details for the Bus Appeals Body. Information should also be provided, in the form of a leaflet, about other bodies such as local authorities, Traffic Commissioners and Bus Users Groups to whom complaints may be addressed in certain circumstances. The relevant contact points on notices and leaflets should be agreed locally. Notices should be posted in a conspicuous position (on both decks of a double deck bus, where practicable). Operators should ensure that timetables, and wherever possible other promotional materials, carry the same information as the notice displayed in the vehicle”.

- 4.26 Recommendation 2: We agree with the Government’s proposal that operators should display notices about how to complain on all of their buses. However, we would like operators and local authorities to go further. All transport and traffic authorities should provide contact details for complaints on their websites. All bus operators with websites should do the same. The details should include a phone number, an email address (where one exists), as well as a postal address. Details of how to complain should also appear on bus stops, where feasible, and at bus stations.

Do bus passengers know their rights? Does this affect their approach to complaining?

- 4.27 Passengers may be discouraged from complaining if they don’t know their rights. There is no hard evidence from the JMP study about whether or not passengers know their rights, and how this affects their propensity to complain. However, the poor publicity given to charters and conditions of carriage (significantly worse than on the railways) suggests it is unlikely that passengers are fully aware of their entitlements. Some of the major operators put conditions of carriage and customer charters/guarantees on their website, but many do not; some make them available in depots and travel shops. The prevailing culture appears to be not to actively encourage complaints, although some operators and local authorities do so.
- 4.28 Recommendation 3: All operators with a website should place conditions of carriage on it or in staffed offices.

Do bus operators and local authorities have complaints policies or procedures? Are these published?

- 4.29 Complaints policies and procedures offer clarity and consistency to complainants and staff about how complaints should be handled. Agreeing a policy provides an opportunity to review back-office systems for delivering effective complaints handling.
- 4.30 The Confederation of Passenger Transport (CPT) has developed a *Code of Best Practice on Customer Suggestions and Complaints*. The Code is published on its website. This Code is rather basic, although it does contain some useful points, for example:
- It advises operators to respond within one week. If this is not possible, an acknowledgement should be sent within one week and a response of further follow-up within three weeks.

- If the complaint topic is outside the operator's responsibility, the response should include the name and address of the relevant body and, if appropriate, confirmation that the complaint has been passed on
 - The operator's conditions of carriage and company regulations should be available to passengers on request
- 4.31 While the CPT Code is welcome, the level of awareness of the detailed provisions of the Code amongst operators is unclear.
- 4.32 In the absence of a formal definition of what constitutes a policy or procedure, it is difficult to state with any certainty what proportion of operators and authorities have one. In general, operators do not place more than a few lines about how to complain on their websites. There are exceptions:
- Metrobus has its excellent and comprehensive complaints procedure on its website: it says that replies will aim to answer all points of concern; be factually correct; avoid jargon; contain full contact details; tell the person what to do next if they are still not satisfied; be signed by the person who will address any further queries raised by the same customer on the particular area...Procedures for investigating complaints are open, advertised and understood by all those involved in the complaint; fair, not biased towards anyone involved; thorough, involving finding out the relevant facts, talking to everyone involved, and checking details where possible; consistent, treating people in similar circumstances in similar ways – everyone involved should be equally informed of the decisions reached”.
 - Ipswich Buses also has its complaints procedure on its website;
 - Stagecoach in Warwickshire also publish their commitments to complainants;
 - Stagecoach in the East Midlands make them available at depots and travel shops.
- 4.33 All local authorities provided information on how to complain on their websites. 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 bus issues.
- 4.34 PTE websites are easiest to navigate. Some references are very brief; other PTEs provide more extensive information on how complaints are handled.
- Metro publish a series of statements on their website, e.g. that their “senior management team monitors all feedback...and works to ensure that standards are maintained. When Metro notices a number of complaints about the same subject...the matter is taken up with the operator of that service and additional monitoring may also be arranged”. There are examples on its website of action taken.
- 4.35 Procedures could cover, for example, a definition of a complaint, publicity arrangements, accessibility, remedies, analysis, third parties and appeals. We have come across a number of examples of excellent complaints procedures in the bus industry. For example, the Metrobus Complaints

Handling Policy is a model of best practice. The bus industry can also learn from the rail industry in this respect. The Strategic Rail Authority's Guidance on Complaints Handling Procedures is well worth looking at.

- 4.36 Recommendation 4: All operators and local authorities should be required to establish a complaints procedure. Passenger Focus will discuss model complaints procedures with the industry.

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

- 4.37 There is little point in clarifying how complaints will be handled if there is no consistency about what constitutes a complaint.
- According to the Metrobus Complaints Handling Policy, “a complaint is any expression of dissatisfaction; if a person contacting us thinks it is a complaint then it is, whatever we may think; someone may also make a comment about part of our service that we could improve and not call it a complaint. This comment is equally important and will be listened to, recorded and used, where possible to improve service quality; a complaint or comment may be about service delivery or policy – we must tell customers who want to complain about our services and/or policy how to go about it”.

It also says that “to achieve the required effectiveness of this complaints policy, systems have been established to record complaints information in a form that is: consistent and detailed, covering all formal complaints and as many as possible of the complaints handled informally; simple and practical; useful, allowing Metrobus to monitor and respond to complaints, and highlighting areas where services appear to be failing”.

- 4.38 However, according to our research, there is little consistency between local authorities in how complaints are logged, recorded and referred to other organisations. This appears also to be true of operators. In most cases the local authorities receive complaints through a variety of channels, e.g. customer contact centres, websites, councillors, direct calls to the transport department. This can influence the way the complaint is dealt with and whether or not it is recorded.
- 4.39 Across the bus industry there is a wide variation in the way complaints are recorded. PTEs tend to have more in-depth recording systems. Some operators were reluctant to let us see figures for the number of complaints they have received; some authorities were unable to supply figures. Inconsistent definitions and recording procedures make it impossible to produce reliable industry-wide statistics about the number of complaints handled.
- 4.40 For over ten years, rail operators have been required to publish the total number of written complaints received on an annual basis, and the percentage of complaints closed within 20 working days and within each operator's target closure time. In 1998-99 train operators received 122 complaints per 100,000 passenger journeys; by 2008-09 this had been reduced by more than half to 55 (ORR Rolling national rail trends 2008-09) . The corresponding figure, based on 2,610 million bus journeys per annum in

England outside London (DFT Bus and Light Rail Statistics GB Q1 2009, June 2009) would be about 1,430,000 complaints.

- 4.41 However, rough estimates from our research suggest that the actual number of bus complaints is likely to be a mere fraction of this. There could be a variety of reasons for this: lack of knowledge of their rights; uncertainty about how to complain; lack of confidence in making a complaint; the feeling that it's not worth the trouble; low expectations of a response; other specific barriers (see below) and even greater satisfaction with services.
- 4.42 Recommendation 5: Operators and authorities should regard any expression of dissatisfaction as a complaint, and should endeavour to keep a record of all complaints so defined.
- 4.43 Recommendation 6: The Government should require operators to report annually on the number of complaints they received.

Do operators and authorities know what bus passengers are complaining about?

- 4.44 Complaints data equates to a free opinion research dissatisfaction survey. A thorough analysis of the data can yield much valuable information about where services and infrastructure need to be improved.
- 4.45 Our research indicates that recording systems, where they exist, tend to have been introduced to help monitor performance against turnaround targets, rather than as a management tool to capture issues of rising concern. Passenger Transport Executives generally have more sophisticated systems; their adoption of similar software packages should facilitate consistency.
- 4.46 London Buses analyse complaints against over 50 categories. First in Bristol and First in Somerset & Avon use 44 categories and use these to generate reports to service planning and Board meetings. For all but the largest operators this may be more than necessary. However, superficial categories like "information" do little to identify what is going wrong.
- 4.47 Recommendation 7: Passenger Focus will work alongside operators and authorities to help them to identify a sufficiently wide range of categories to facilitate effective analysis.

Do operators and authorities actively welcome complaints?

- 4.48 Complaints can be viewed as "free intelligence" into how to improve your service and should be welcomed as such. Effective complaints handling requires skill as well as commitment: larger operators, in particular, should train those staff responsible for handling complaints.
- 4.49 Our research did not specifically explore whether operators and authorities welcome complaints; nor did we ask whether complaints handling staff receive training. A small minority of complaints procedures actively encourage people to complain; these tend to be the same organisations that refer to training their staff.

- 4.50 Our research also found that it was typical for the contact details provided by operators to be presented as general information enquiries rather than a specific complaints contact.
- 4.51 There is little evidence of operators or authorities actively welcoming complaints or providing training for staff in complaints handling. However, there are exceptions:
- Metrobus Complaints Handling Policy is to “welcome complaints”, to investigate them all thoroughly and fairly; to wherever possible find an appropriate resolution and to use information to improve services. Staff are trained to actively listen, to “welcome complaints as an opportunity to put things right for customers and to improve services” and “to actively listen to people who have a complaint”.
 - Stagecoach in Warwickshire “welcomes suggestions, feedback and complaints because they help us to improve our services and put things right when they have gone wrong. We want people to contact us rather than stop using our services”. All of their staff “are trained on our commitment and our procedures for handling suggestions, feedback and complaints... Responsibility for ensuring we handle suggestions, feedback and complaints lies with the Managing Director”.
 - Go Ahead North East: “Members of our dedicated customer service team are available on weekdays from 0800 until 1800 to take your calls. They also take personal responsibility for making sure that our managers are fully briefed on all customer suggestions and complaints. We value your comments and every effort is made to use the information you provide to improve our services”.
 - South Yorkshire PTE’s slightly less complaints-specific commitment is that: “We promise we will be welcoming, friendly, helpful and polite”.
- 4.52 Recommendation 8: All local authorities and operators should state in their publicity that they actively welcome complaints.

Do bus passengers find it easy to complain?

- 4.53 Our research indicates that some passengers find it difficult to complain and would value a wider range of mechanisms for submitting their complaints.
- 4.54 It also found that some operators’ websites included addresses for correspondence and/or phone numbers and/or email addresses, but there was little consistency of approach. More people complained by telephone than by letter, email or in person combined. The requirement to write letters can be a barrier for some. It can also be hard to get through to the right person at the bus company on the phone.
- 4.55 There was no conclusive evidence from the research about whether disabled passengers are disadvantaged when they want to complain.
- The Metrobus Complaints Handling Policy covers a range of accessibility issues and states that “our complaints system welcomes complaints from people with physical, sensory or learning disabilities and from anyone whose first language is not English or from people who have a reading

difficulty or cannot read at all. Our complaints procedures take into account our responsibilities under the Disability Discrimination Act 1995 (DDA), which deals with disabled people's access to goods, facilities and services".

- 4.56 Complaining should not be too complicated. Some complainants called for comment cards to be made available on buses and asked to be able to text their complaints.
- 4.57 Passengers quickly become frustrated when they are passed from pillar to post; complaints handling works best when someone takes charge. It is best practice to provide a named contact person who will take personal responsibility for your complaint, liaising where necessary with other departments and organisations. Complainants told our researchers that they felt they should be given the name of the person handling their complaint and a reference number.
- 4.58 Complaints can be hampered by passengers' inability to provide details of vehicle registration or other defining numbers, which is not helped by the way some of this information is displayed.
- 4.59 Some conditions of carriage and complaints policies place a time limit on the submission of complaints.
- 4.60 Recommendation 9: Operators and authorities should ensure that it is always be possible to make a complaint over the phone (although in some cases it may be necessary to follow-up in writing, e.g. where compensation is claimed)
- 4.61 Recommendation 10: Complainants should be given the name of the person taking responsibility for their complaint, and a reference number.
- 4.62 Recommendation 11: Information which passengers may need to quote in pursuit of their complaint should be clearly displayed on the bus.

Are there other things that prevent bus passengers from complaining?

- 4.63 Barriers reported by our researchers include the fear of spending too long "wrapped up in the complaints process" or reluctance to cause a scene on the bus.
- 4.64 The cost of phone calls can be an issue: call rates for telephone complaints lines should be reasonable.
- 4.65 Recommendation 12: Under no circumstances should an operator be able to charge premium rates or numbers through which they make a profit. We favour a low-rate tariff (local rates). In setting the number, we are mindful that many mobile phone tariffs exclude the national 08xx lo-call numbers. So what should be a cheap call turns out to be very expensive. Operators should take this into account when providing a contact number.
- 4.66 Passengers may also be reluctant to complain if they fear that they will be victimised for doing so or if they are concerned that their personal information may be passed on to others without their consent.

- Metrobus Complaints Policy “ensures confidentiality so that customers are not discouraged from making complaints”. They also say they will remove barriers to complaining: “users of buses may not feel confident about making a complaint without some support from us. We will ensure that we provide this support where necessary and inform people of help they can get from outside Metrobus (e.g. local councillors, Citizens Advice Bureau, Age Concern etc). We will tell people that they can ask a friend or relative to help them with a complaint, or even make it for them, and that this will not affect the way we deal with their complaint. People may also not complain if they fear the organisation or staff will discriminate against them in future. We will make clear to customers that they will not suffer as a result of any complaint and ensure monitoring procedures are in place which guarantee that discrimination does not take place”.

4.67 Recommendation 13: Operators and authorities should include a confidentiality statement in their consultation policy.

How satisfied are passengers with the way in which their complaints are handed?

- 4.68 There have been no nationwide studies of passenger satisfaction with complaints handling.
- 4.69 Our researchers spoke to 30 passengers who had made complaints: 14 of these were not satisfied (8 “very dissatisfied” and 6 “dissatisfied”) with the way their complaint had been handled. Thirteen did not receive a response at all; others were not satisfied because nothing changed as a result of the complaint. Only 3 out of 30 complainants were satisfied.

Do operators and authorities set targets for handling complaints, including speed of response? Do they publish their targets and their performance against them?

4.70 Setting targets for complaints handling can help to incentivise authorities and operators and provide a benchmark against which to measure their progress. Publicising performance alongside targets, particularly when done consistently across the country, facilitates industry-wide comparisons which can benefit both the industry and passengers. Setting targets for responding is important, but they need to be realistic. The industry will have achieved little if they meet their targets by sacrificing quality or responding to detailed complaints without carrying out the necessary investigations into what happened.

- Many local authorities and operators set targets for the speed with which they respond to complaints. Our research indicates that Blackpool, Herefordshire, North Yorkshire, Nottinghamshire and Surrey all set such targets.

4.71 Targets are not commonly published. There are, however, exceptions:

- Stagecoach in Warwickshire: “We will provide a response as quickly as possible and always within one week, even if this is initially to explain what investigation needs to take place and how long this will take”.

- Arriva: “When you submit your comment to us you will receive an automated acknowledgement. If you have asked us a question we will try to respond within a working day. If you have made a comment we need to investigate further, we will do our best to get back to you within 10 days”.
 - Go Ahead North East: “We promise to reply within 5 working days”.
 - Ipswich Buses: “We will deal with all complaints, and a written reply will be sent within 5 working days. If it appears that a reply cannot be sent within five working days, we will acknowledge the complaint within two working days, and will outline an expected likely timescale for a further response”.
- 4.72 Some of the smaller operators just say they aim to deal with complaints straightaway or as soon as possible.
- 4.73 Whilst it is important to set targets, best practice requires performance monitoring and success at meeting targets. There is little evidence from our research that speed of response to complaints is generally monitored.
- 4.74 There is less evidence still from our research that operators and authorities monitor satisfaction with their complaints handling. However, Roger French, MD of Brighton & Hove, contacts five complainants a month to see if they are satisfied.
- 4.75 Recommendation 14: Operators and authorities should acknowledge complaints promptly when they come in, particularly where a substantive response cannot be sent immediately. Where a response cannot be sent within the published timescale, or in any event within 20 days, the complainant should be kept informed of progress and told when they should expect a response.
- 4.76 Recommendation 15: Complaints handling should be regarded as a service, rather than simply an activity. Operators and authorities should systematically ask those who complain how satisfied they were with the way their complaint was handled, and use feedback to improve their complaints handling service. And they should publish the results of complainant satisfaction surveys.
- 4.77 Recommendation 16: The Government should require operators to report annually on, the speed with which they handled their complaints. This could be included in local authority contracts with operators.

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

- 4.78 There is little evidence that operators are using complaints as an opportunity to investigate incidents, review procedures and improve services.
- 4.79 The use of standard letters supports the impression that, all too often, complaints have not been properly investigated. Complainants told our researchers that they wanted to receive personalised letters rather than standard ones, and that they would like to see bus operators highlighting how the company is using the complaints received to make improvements.

- First Bristol and First Somerset & Avon investigate every complaint they receive, passing them straight to the relevant depot manager who discusses all incidents with the driver concerned.
- Metrobus' Complaints Handling Policy covers the analysis and reporting of complaints data to those in a position to act, and monitoring of the effectiveness of the policy. It states that: "to ensure that the complaints procedures are effective in improving our services these are designed to – provide a clear picture of customers' views of the service and the improvements they want; record complaints consistently and in detail and provide data for analysis of results; channel the information to those who can take action to prevent problems happening again; give feedback to customers who complain, other potential users and staff on what action has been taken".

4.80 Recommendation 17: The Government should require operators to report annually on any action taken as a result of receiving complaints.

What remedies are offered to bus passengers?

4.81 Passengers are most likely to be satisfied with the way their complaint has been handled if they are offered the remedy they are looking for. Not all complaints will be justified and, even where they are, operators will not always be in a position to respond in the way complainants wish. But it will be almost impossible to do so if they do not take the trouble to ask the complainant what they would like to happen. Research indicates that many passengers are motivated more by a desire to get an apology and to prevent the same thing happening again, than by a desire to obtain financial compensation.

- The Metrobus Complaints Handling Policy "recognises that most people want to prevent the same thing happening to themselves again and to others" and it states that they will "try to make sure the remedy is, where possible, what people want".

We commend this approach to all operators and authorities.

4.82 Complainants told our researchers they received a variety of responses, including apologies over the phone, letters of apology or explanation and, in two cases, free tickets. They called for swift acknowledgements and apologies, compensation, for someone to listen to them and be held accountable, and for improvements to prevent the problem from happening again.

- Stagecoach in Warwickshire: "When we have failed we will offer a sincere, speedy apology and a genuine commitment to avoiding a repetition".

4.83 Recommendation 18: All operators and local authorities should make it their policy to try to ensure that when they get something wrong the remedy they offer is, as far as possible, what people want.

Is there a case for a body to enforce effective complaints handling?

4.84 The findings of our research suggest that the quality of complaints handling by the bus industry is patchy, with many complaints not responded to at all. The initial involvement of the Office of the Rail Regulator after rail privatisation helped to raise the standard of complaints handling in the rail industry. Its role at that time was to:

- Set standards – through approving operators' complaints handling procedures and subsequent revisions to those procedures
- Monitor compliance with these standards – through receiving direct feedback in the form of correspondence from members of the public and MPs, from individual monitoring of key complaints statistics provided by train operators, and through independent auditing of train operators' complaint handling procedures and systems
- Promote best practice by facilitating the sharing of best practice information throughout the industry
- Enforce standards – by using his formal powers to secure improvements for the benefit of passengers
- Resolve cases referred from RUCC (Passenger Focus) – by investigating and taking appropriate action.

4.85 Recommendation 19: In our response to the consultation on the proposed EC Regulation on passengers' rights, Passenger Focus supported the idea of an obligation on operators to set up a complaints procedure and to respond to complaints within 20 days, enforced by the Traffic Commissioners. Operators should also be required to publish an annual complaints report, a duty which should be enforced by the Traffic Commissioners. We believe that all of our other recommendations can best be achieved at this stage by our working alongside operators and authorities, encouraging them to develop best practice.

5 Appeals

5.1 In this report, the term 'appeal' refers to any follow-up by passengers who wish to take their initial complaint further after receiving a reply from the bus industry.

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

5.2 Passengers should always have a right to appeal to an independent body if they are not satisfied with the way their complaint is handled. This right should apply across all service and infrastructure issues.

5.3 Bus Users UK (BUUK) handles appeals where bus passengers are not happy with the response from the operator. BUUK dealt with 526 appeals from across England in 2008. The majority were dealt with by BUUK staff.

5.4 The Bus Appeals Body (BAB) is a non-statutory body that deals with operational issues such as poor reliability, conduct of staff and driving standards. BAB does not handle complaints about policy or commercial

matters on routes, times, levels of service or pricing. In 2008 BUUK referred just 26 cases to BAB.

- 5.5 Consequently, there is not always a route of appeal where complaints fall outside the jurisdiction of the BAB.
- 5.6 In some instances PTEs do not refer complaints to the BAB: they have independent bodies that they use to investigate complaints, such as the Joint Secretariat used by South Yorkshire PTE. Metro handles complaints where the complainant is not satisfied with the response of the bus operator.
- 5.7 All councils have procedures for escalating complaints within the authority if complainants are not satisfied with the original response. Appeals about bus stops, shelters and stations, information and integrated transport can be taken to the Local Government Ombudsman, but only if they involve maladministration, i.e. a complaint about the way their complaint was handled, rather than an investigation of the substantive issue.

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

- 5.8 The right to an independent appeal is ineffectual if passengers are unaware of it and do not have the information they need to pursue an appeal.
- 5.9 Discussions with operators indicated that they often only provide information to passengers on how they can appeal once they have done everything they can to resolve the complaint themselves. 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.
- 5.10 Only five of the 30 people our researchers spoke to who had made a complaint could think of an organisation to escalate their complaint to, while ten said they did not know how to take their complaint further. Another ten said they did not see any point in pursuing the complaint.
- 5.11 Recommendation 20: In the Government's consultation, the proposed Regulation 5 would require operators to provide contact details for appeals if passengers are not satisfied with the way their complaint has been handled. We support this proposal. The Traffic Commissioners should be asked to enforce this requirement. We suggest that, in the first instance, the Department discusses with VOSA a practical way of handling enforcement of this Regulation.

Do appeals handling bodies have policies or procedures for handling appeals? Are these published? Do they have consistent policies on recording appeals?

- 5.12 As with first stage complaints, policies and procedures offer clarity and consistency to complainants and staff about how appeals should be handled. Agreeing a policy provides an opportunity to review back-office systems for delivering effective appeals handling. Keeping records and reporting on appeals provides valuable management information on the most intractable complaints.

- 5.13 The BAB terms of reference are clearly set out on their website and summarised in a publicity leaflet to be made available to via complainants via operators and on request. A three month deadline is given for submitting an appeal.
- 5.14 BUUK's annual report says how many appeals it has dealt with in the past year, and how many it has passed on to BAB. However, it offers few details beyond the bare numbers.
- 5.15 Recommendation 21: All bodies handling bus appeals should publish their policies and procedures for handling appeals. First stage complaints handling bodies should make reference to the existence of policies and procedures when alerting complainants to their right to appeal, and to advise them how they can obtain a copy.
- 5.16 Recommendation 22: All bodies handling bus appeals should keep a record of all appeals and report annually on the number they received.

What prevents bus passengers from pursuing appeals?

- 5.17 Our researchers spoke to 30 passengers who had made complaints and asked if they had tried to take their complaint further after the initial response. Ten explained that they did not know how to take their complaint further. Another ten said they did not see any point in pursuing the complaint.
- 5.18 The Government's proposals for requiring operators to publicise complaints and appeals avenues, coupled with the improvements we are calling for in the handling of complaints, should address many of these issues.

Do appeals handling bodies set targets and monitor and publish information about how they have performed against them? How quickly do they respond to appeals? How satisfied are bus passengers with the way their appeals are handled?

- 5.19 Setting targets for the handling of appeals can help to incentivise Bus Users UK, the Bus Appeals Body and other appeals bodies, and provide a benchmark against which to measure their progress.
- 5.20 The BAB leaflet advises complainant to give the bus operator up to three weeks before contacting them. BAB aims to take no more than eight weeks to reach a decision, though sometimes it can take longer if the case is complicated. BAB does not publish information about how it performs against this target. The satisfaction of complainants is not monitored.
- 5.21 Recommendation 23: Appeals handling bodies should report annually on how quickly they have dealt with appeals and what action was taken as a result of them.
- 5.22 Recommendation 24: The Bus Appeals Body should carry out satisfaction surveys of appellants and publish the results. Other appeals handling bodies should also consider doing so.

Who should handle appeals?

- 5.23 Arrangements already exist for handling appeals in respect of complaints about bus operators via Bus Users UK and the Bus Appeals Body. There are also arrangements for handling appeals against local transport authorities and local traffic authorities via a variety of appeals bodies.
- 5.24 How effective are these arrangements in getting the industry to look again at the original complaint and in helping to resolve disputes? Can the arrangements be improved, or would it be better to hand over responsibility to another body? Are there any complaints for which there is no route of appeal if passengers are dissatisfied with the way their original complaint has been handled; if so, how can this gap best be filled? These questions are addressed below.
- 5.25 In addition to interviewing complainants and arranging focus groups of bus passengers, our researchers talked to a wide range of stakeholders.

How effective are these arrangements in getting the industry to look again at the original complaint and in helping to resolve disputes?

- 5.26 We do not as yet have conclusive, independent evidence about the effectiveness of BUUK and BAB. Bus Users UK state that they have resolved 95% of the cases that came their way to the satisfaction of all parties without needing to refer the complaint to the Bus Appeals Body. However, in the absence of an independently conducted satisfaction survey, it is impossible to verify whether all of these passengers were genuinely satisfied or whether some 'threw in the towel' seeing no prospect of a resolution.
- 5.27 Our research did not seek to gather evidence about the effectiveness of the other appeals handling bodies.
- 5.28 It is likely that some passengers were dissatisfied with the response to their first-stage complaint but decided not to pursue it further (our researchers spoke to a number of complainants who fell into this category).
- 5.29 In some cases this will be because passengers were unaware of how to appeal. The proposals in the Government's consultation document for proactively informing all complainants about their right to appeal should address this point.
- 5.30 Others may feel it's not worth the trouble. It is possible that some will be put off if they feel the body handling the appeal is not independent of the body to which they have already complained and that there is therefore no point. However, what evidence we have on this point from the research is inconclusive, with some passengers saying independence is important and others that it doesn't matter to them.

Can the arrangements be improved, or would it be better to hand over responsibility to another body?

- 5.31 Our research focused on first-time complainants, and provided little evidence about the experience of passengers pursuing an appeal and how procedures could be improved.

- 5.32 In the absence of robust performance data, it is difficult to pinpoint areas in need of improvement and, from there, identify solutions. All bodies handling bus appeals should publish both speed of response and customer satisfaction targets, monitor their performance against these and publish the results. A well-crafted, independently conducted customer satisfaction survey should provide valuable insights into how arrangements can best be improved.

Are there any complaints for which there is no route of appeal if passengers are dissatisfied with the way their original complaint has been handled; if so, how can this gap best be filled?

- 5.33 If passengers are not happy with the way their complaint has been handled concerning policy or commercial matters on routes, times, levels of service or pricing they have nowhere to go. On the basis of the information that we have at the moment, this represents a serious weakness in the existing arrangements for handling appeals.
- 5.34 Under services provided commercially by the operator, decisions about the routes, times, levels of service and fares are all matters of commercial judgement. If passengers are dissatisfied with such matters they should have a right to pursue their complaint to appeal stage. Excluding appeals on these matters is unacceptable.
- 5.35 Recommendation 25: The Bus Appeals Body should expand its remit to include all bus appeals.

6 Conclusion

- 6.1 Our research suggests a high level of passenger dissatisfaction with complaints handling by the bus industry.
- 6.2 It is the responsibility of the industry to address this issue and to improve the way in which complaints are handled. It is only fair that the industry should be given time to put things right. But it is not reasonable to expect passengers to wait too long before they see a significant improvement. We suggest 15 months would be an appropriate timescale.
- 6.3 We believe we have a contribution to make in improving complaints' handling by working closely with bus operators and local authorities. We will work closely with the industry, with Bus Users UK and the Bus Appeals Body over this period to help them to achieve a step change.
- 6.4 There is no reliable record of the number of complaints handled by the bus industry at present. Furthermore, it is hard to predict the volume of appeals that will be made once the Public Passenger Transport (Display of Information) (England) Regulations 2010 come into force next year.
- 6.5 At the end of 15 months, Passenger Focus will carry out further research to establish what improvement there has been to the handling of complaints and appeals, and to quantify the number of appeals following the introduction of the new publicity requirements. If there has been no significant improvement in the handling of complaints and appeals, Passenger Focus would be prepared to take on the appeals role, but only if funded to meet the level of

appeals presented (the volume of appeals should be clearer by then). Such funding would not necessarily have to come from Government: for example, the industry could be required to pay a levy to support an independent appeals-handling service.

- 6.6 Taking on the appeals role would be a significant addition to the responsibilities currently foreseen and the commitment to encompass it would, in our view, require specific direction from ministers and agreement on resourcing the requirement.



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