

Helping consumers get a better deal

Call for evidence on improving the consumer landscape and quicker switching

Summary

Transport Focus is a statutory body with a heritage dating back to the 1947 Transport Act which nationalised the railways. In 2008 our statutory duties were expanded to include bus, coach and tram passengers and, more recently, to include users of the Strategic Road Network. Our statutory duty across each mode is to represent the interests of users and potential users.

Our ability to do this in a cost effective, efficient way is recognised in the Government's recent 'Triennial Review' of our operations. This particularly recognised the value of our research and of our working relationships with stakeholders. It also raised concerns about the disruption and transitional costs involved in any major structural change.

We recognise that the consultation covers a number of sectors but we have limited our response to transport – our particular areas of specialism and expertise.

We believe that there is a strong case for maintaining the current long-term, professional, multi-modal approach to consumer representation in the transport sector to maximise benefits for transport users. We believe that this approach has:

- Resulted in continual improvements and benefits for consumers, for example in:
 - Improving the flow of information before and during disruption (both planned and unplanned) so as to minimise the impact on passengers.
 - Benchmarking levels of passenger satisfaction for rail, bus and tram passengers and using this information to drive improvements from both operators and regulators. We are now developing this for our road remit.
 - Using the data gathered from the 2500-3000 rail complaints we deal with each year to highlight areas of consumer detriment. This includes the way that the rail industry handles revenue protection and the way it provides assistance to passengers with disabilities.
- Enabled us to develop a highly professional research capability that contacts over 120,000 users a year (which will increase when our Strategic Roads User Survey launches next year) asking for their views and then using this information to influence decision makers (e.g. through our involvement in rail franchising, on bus punctuality and on the quality of road surfaces).
- Given us the base to develop and modernise our approach to consumer engagement through innovative research methods (emotional tracking, social

media, trust, consumer panels) and through direct engagement with decision makers.

We believe that our specialism, credibility and the relationships we have developed are critical to us achieving successful outcomes for passengers and road users. It is not just a case of gathering information, it is how this is turned into something that is both useful to, and trusted by, decision makers that makes the difference. Our multi-modal approach also helps secure additional benefits for consumers – we are able to identify and assess lessons learnt in one sector and then apply them effectively in the others.

1. Background

Before addressing the specific questions we feel it would be useful to set out Transport Focus's remit and background – we feel this will help provide context to our answers below.

Rail

Transport Focus is a statutory body dating back to the 1947 Transport Act which nationalised the railways. Our role has been amended by various Acts of Parliament since, including Transport Acts of 1962, 1985 and 2000; and the Railways Act 1993, and 2005. However, our purpose has remained constant: we have a statutory duty to represent the interests of users and potential users of the railways.

We also have a specific regulatory or consultative remit on a number of rail activities – for example: station closures, station modifications, changes to ticket office opening hours, changes to ticket 'flows' and 'permitted routes', and train company complaint and disability procedures.

In addition we have a specific role with passenger complaints. We have a statutory duty to consider 'representations' but our main complaint function comes via the Office of Rail and Road's (ORR) licence regime which establishes us an appeal body for when passengers are unhappy with the response to their complaint from the rail industry. This is a mediation type role – we do not have any formal powers to compel action. We also have a statutory duty for complaints under The Rail Passengers' Rights and Obligations Regulations 2010. As it currently stands this covers international journeys but once existing derogations have elapsed it will also apply to domestic journeys.

Transport Focus's general duty covers Great Britain but there are specific exclusions covering London. Our colleagues at London TravelWatch¹ represent the interests of transport users in and around the capital both on rail and for services operated or

¹ <http://www.londontravelwatch.org.uk/home/>

licensed by Transport for London. We have worked side by side for many years and have well developed, strong relationships at officer and board level (the Chair of London TravelWatch is on Transport Focus's Board). We also have well developed and clear processes for dealing with complaints.

We also work effectively with The Office of Rail and Road (ORR) to ensure that passenger needs are fully taken into account in the regulatory process.

Bus, coach and tram

In April 2008 the Secretary of State for Transport announced that he planned to widen our role to include bus, coach and tram passenger representation in England (outside London). This was enacted in the Local Transport Act 2008 and through The Passengers' Council (Non-Railway Functions) Order 2010.

Our duties are again wide ranging: to represent the interests of users and potential users of road passenger transport. We achieve this through specialist research and advocacy, and by developing effective working relationships.

Road

In 2014 the Department for Transport (DfT) announced that we would widen our role, from representing passengers to representing all those who use the motorways and certain A roads in England (the Strategic Road Network - SRN).

This was enacted in the Infrastructure Act 2015. Our duties are to protect and promote the interests of users of the SRN. This includes motorists, freight and business users, as well as those who walk or cycle on the network.

In order to reflect this added responsibility, we changed our name from Passenger Focus to Transport Focus.

In coordinating our wide range of activities we have also consistently striven to generate efficiencies and cost savings. In 2010 we reduced our costs by 40% and we will be looking to generate a further 15% of savings in the coming years. As a result of generating external income (on things like joint funding for research) and by identifying synergies between our different transport modes we have ensured that our influence and effectiveness has not been diminished – in fact, given our new role with roads, it has actually increased over this period.

2. Consumer Advice

Q1. Are there problems with the current provision and routes to advice and information for consumers in these sectors?

Q2. If yes, what are these problems and how can provision be improved?

The consultation asks whether having a number of different sources and routes to advice means there is a risk that roles overlap, with scope for confusion and inconsistency in the advice consumers are being given.

Having a one-stop-shop for consumers that crosses various utility sectors can look attractive on paper, but we feel there is genuine risk in losing sector specific knowledge which is absolutely crucial, particularly in complex sectors, to maximise the delivery of benefits to passengers and road users. Without wishing to overgeneralise there is a fundamental difference between buying a product and making a journey.

Electricity, for instance, is generally delivered to the door and is largely uniform in nature. With public transport it is the person who is being 'delivered' rather than the product and as a result there are many more qualitative issues to address as part of the transaction – for example, issues of comfort, cleanliness, and the behaviour of other customers. Indeed, rail has a whole series of legal byelaws covering acceptable behaviours – with the threat of criminal sanctions if they are not met. On road there is the need to balance the sometimes conflicting needs of different users – i.e. private motorists, freight users, cyclists and pedestrians. These important differences could easily be lost if all transactions are considered to be the same.

Transport is also a much less homogenous product. To a large extent electricity in one part of the country is the same as that in another part. With transport there are huge differences in the availability and quality of transport provided between regions and even, at times, within the same town. Public transport, particularly bus, is a much more local product and as such benefits from specific knowledge and advice. Through our own research, our own travels, by liaising with users, and by working with other bodies (such as local rail user groups and Bus Users UK) we have built up a good network of local knowledge. This includes well developed relationships with key stakeholders and decision makers, and developing high levels of credibility with them. For example, we are members of the Bus Alliance Boards in Liverpool and Birmingham which are established by the respective local authority to improve bus services. There is a risk that this local expertise and input is lost if all consumer advice is channelled through a central system.

We agree with BIS that access to high quality advice and information is very important. On public transport this is not so much for switching purposes (there often being limited choice of operator) but it is important in generating consumer confidence, and in facilitating modal choice.

This is something that we have addressed in our work. For example, we know through our work on rail that there is much that can be done to improve levels of trust

among passengers². Part of this surrounds fares and ticketing³ with many passengers finding the current fare structure complicated, confusing and illogical and, as a result, not having confidence that they have bought the best value fare. Through our research on ticket vending machines⁴ and web retailing⁵ we identified specific problems and made recommendations. Using our relationships and our credibility with stakeholders we have successfully pushed the industry for solutions while also distilling advice and guidance for passengers – all of which leads to better overall customer outcomes.

Another way to help address trust/consumer confidence for rail passengers is for the industry to be more proactive in terms of advising passengers of their rights. Our research in 2013 established a low awareness of passenger rights and uptake of compensation for delay⁶. As well as being able to identify a number of recommendations for the industry we were also able to adapt our own messages/media comments during periods of disruption to advise passengers to claim what they were entitled to. We are now repeating this research (using our relationship with DfT and ORR) to measure progress and maintain pressure.

Disruption is another key issue for passengers. They need to know if there is engineering work causing extended journey times or bus replacements. Ensuring that passengers know in advance of buying a ticket or are informed far enough out that they can plan around the disruption is key⁷. It is also an important component of trust and building a relationship with passengers.

We recently used our existing relationship with Great Western Railway (GWR) to work with them on improving the provision of information during engineering work in the Bath and Reading areas. This involved research before and during the engineering work to determine whether passengers were aware of the impending disruption and, if not, how this could be improved⁸. Crucially, the information gathered in the initial phase was used to improve the actual flow and targeting of information before the actual engineering work started. The end result was a much greater awareness and understanding of the work and the alternative travel options – and, because of this, higher levels of satisfaction with the way the disruption was managed.

Our work (based again on specialist, credible research) also suggests that putting more rail data into the public domain can also help with journey planning/consumer

² Passengers' relationship with the rail industry, August 2014

³ Fares and ticketing study, February 2009 and Passenger Focus response to the Government's rail fares and ticketing review, June 2012

⁴ Ticket Vending Machine Usability, July 2010

⁵ Ticket Retailing Website Usability, July 2011

⁶ Understanding rail passengers – delays and compensation, July 2013

⁷ Passenger information when trains are disrupted, May 2014

⁸ Planned rail engineering work – the passenger perspective, December 2015

choice. Punctuality and crowding data can help determine choice of train or time of travel amongst those who have flexibility when they travel – it can also help to manage expectations of those who do not have such flexibility⁹.

Our wider, specialist role also enables us to look at potential users of services rather than just focus on any detriment to existing passengers. Our research¹⁰ shows that the main barriers to increased rail use are an assumption that the door-to-door journey would take longer, a belief that using rail would cause extra “hassle” compared to using the car, and the perceived cost of the ticket. Non users tend to over-estimate these negatives – i.e. that journeys will take longer, cost more and be less punctual than they actually are. Good journey planning information can help to challenge these perceptions and facilitate informed choice.

On bus we have found similar themes. Better access to information on fares is essential: passengers did not realise what ticket types existed and relied on word of mouth and the bus driver for information on times, routes and fares. We identified this as a particular issue among 16-19 year olds¹¹. We are working with the industry on ways to improve awareness on websites. Our work also shows a clear need for real-time journey information¹² that empowers passengers to make an informed decision on whether to wait for the bus or choose another mode.

Both issues could be helped by the Bus Services Bill, currently working its way through Parliament, which contains provisions for greater open data on fares and timetables. We believe that Transport Focus is uniquely well placed, because of its specialist knowledge, relationships and credibility, to maximise the benefits for bus users arising from the Bill. Our multi-modal remit will also help - we have a wealth of expertise from rail franchising that we can draw on both in terms of establishing what passengers want, how that is to be delivered and what role/level of engagement they want in the process.

There is also a non-user element with bus as well. Utilising our relationship and credibility we were able to partner with Milton Keynes Council to look at barriers to bus use in Milton Keynes¹³. This found a number of people who didn't really know how to use buses in the first place: where to get information on times, routes etc. This was used by the local authority in developing its bus strategy. Improved advice and information therefore also needs a non-user perspective.

⁹ Putting rail information in the public domain, June 2011

¹⁰ Integrated Transport – perception and reality. 2010

¹¹ Bus Passengers Views on Value for Money. October 2013.

¹² Bus passengers' experience of delays and disruption, April 2013

¹³ Barriers to bus use in Milton Keynes, December 2010

It is still early days in terms of our road research. However, we can see that information on disruption is again an important issue for users¹⁴ and, through our relationship with Highways England, we are digging deeper into this area to drive improvements. This, again, has implications in terms of facilitating modal choice. We are also looking at the quality and range of roadside facilities, developing specialist knowledge and credible relationships in the specific sector as a result. We were able to use our relationships with the road haulage industry to ensure that the particular views of those who drive for a living were captured.

To conclude, it is clear from our work that there is still much scope for improvement when it comes to providing advice for transport users. Our work across transport modes suggests that choice (in terms of what mode to use) could be improved through a more joined-up approach to real-time journey planning. Being able to determine the state of roads, bus and rail before setting off would help to inform decisions. On rail and bus there are also improvements to be made with fares and ticketing advice. However, we firmly believe that these improvements are best advanced through specialist multi-modal transport bodies which have a deep knowledge of user needs and the complexities of the industry, as well as broad credibility and deep working relationships, rather than as part of a single body providing advice across all utilities.

Our ability to do this in a cost effective, efficient way is recognised in the Government's recent 'Triennial Review' of our operations. This referred to our national rail and bus passenger surveys being "highly regarded and valued" and that we were "well regarded in most respects" by stakeholders. It also discussed the impact of any significant structural change, saying: "There is also a concern that for a relatively small body with a limited budget, the transitional costs and disruption - including the need for primary legislation – potentially involved in any fundamental structural change could be disproportionate to any potential benefit". It would be unfortunate if change detracted from our ability to deliver for transport users.

2. Consumer Advocacy

Q3. Are there problems with the way that consumers are represented in these sectors?

Q4. If yes, what are these problems and how can it be improved?. Are

We welcome the recognition in the document of the benefits of specialist consumer representation in the transport sector. Needless to say we agree – we believe that the current structure allows us to take a professional, long-term, independent view. This specialist knowledge, alongside our credibility and our relationships, is key to delivering for passengers.

¹⁴ Road user needs and experiences, March 2015

At the heart of all our work is our research. We are an evidence-based organisation that currently spends at least a third of its overall budget on direct research on transport users. Our research model, which applies to our rail, bus and road remits is simple: find out how satisfied users are with the current service, find out their priorities for improvement and then focus on those items that are priorities and where current satisfaction is low. This deep specialist knowledge ensures we have considerable credibility which in turn helps us to develop good working relationships with operators, regulators, local and national authorities and a range of other stakeholders.

Relevant and respected data, used professionally, generates credibility which in turn helps influence decision makers and leads to improvements for consumers. Some examples of this in action are:

- Passenger Information During Disruption (PIDD)
Our work in this area demonstrates the value of long-term consumer advocacy in the rail sector. We know through our passenger priority¹⁵ research and through our satisfaction survey¹⁶ that disruption and how the industry manages delays are key issues for passengers. Our original research looked at the importance of information as well as what type of information passengers wanted at each stage of their journey (what, where, when, how etc). We used our relationship with the rail industry to help develop best practice guidelines. We continued to monitor the situation and identify problems for passengers¹⁷. In 2012 the ORR made improving passenger information during disruption a licence requirement – effectively making the best practice compulsory. In 2014 we carried out a major piece of research to look at the effectiveness of the code of practice¹⁸ in driving up information standards. We are actively working with the industry to help them improve the flow and accuracy of information to passengers.

Transport Focus has been instrumental at all stages: using our specialist knowledge to identify the problem and in helping create the regulatory requirement, and then utilising our relationships to measure progress and in working with the industry on actual improvements.

- Rail franchising

¹⁵ Passengers' priorities for improvements in rail services, 2007, 2010, 2014

¹⁶ National Rail Passenger Survey

¹⁷ Delays and disruption: rail passengers have their say, December 2010 ;

Rail passengers' experiences during the snow, March 2011;

Information: rail passengers' needs during unplanned disruption, September 2011 (joint research with Southern)

¹⁸ Passenger information when trains are disrupted., May 2014

Our work on rail franchising shows the value in having a specialist body with the knowledge and credibility to influence decisions on behalf of passengers. We work closely with the Department for Transport (who we have been told highly value our role) to ensure that passengers' aspirations are fed into the franchise specification, help develop customer satisfaction targets, and provide input to the Department's assessment of bids.

This isn't limited to traditional rail issues – punctuality, seats, fares etc. Our research also shows a desire for greater engagement and empowerment¹⁹. Passengers want a say when it comes to a new franchise (i.e. their aspirations to be heard); they want a clear statement of promises from the operator with regular updates on progress; and they want their opinions to matter throughout the life of the franchise. As a result we have seen an improvement in the level of public consultation by DfT, the introduction of a 'Customer Report' in franchises setting out promises and delivery (thus increasing transparency), and greater use of passenger satisfaction metrics in franchise monitoring.

With the advent of greater devolution we have also looked to develop this model with Scotland, Wales and the English regions. We believe we are uniquely well placed to do this having already established our credibility and specialist knowledge to stakeholders in these areas.

There is also a multi-modal element to this work. We believe we will be able to use our knowledge from rail franchising to help inform the Bus Services Bill which allows for bus franchises to be created. We see significant parallels between the two and believe we can use the lessons learnt in one sector to benefit the other.

- Bus punctuality

Our ability to take a long term professional approach to a sector is also reflected in buses. Our work on bus passengers' priorities for improvement and passenger satisfaction both highlight the importance of punctuality²⁰. We developed our understanding with more detailed research into attitudes to delays and timetables²¹ and then put this theory into practice by working with local authorities and operators in nine areas to improve performance²². In addition we were able to work with the Traffic Commissioners (the bus 'regulator') in holding a series of roadshows with bus companies and local authorities to help spread this knowledge and best practice.

¹⁹ Giving passengers a voice in rail services, June 2013

²⁰ Bus passenger priorities. 2010 and 2016

²¹ How late is late? What bus passengers think about punctuality and timetables. January 2014

²² What's the holdup? Exploring bus service punctuality, December 2014

Again, it is the combination of sector specific knowledge, well developed relationships and our credibility that allows this depth and continuity of work.

- Roadworks

We have researched road users views about the way roadworks are managed by Highways England – important given the DfT's significant capital investment programme. Our strong working relationships with Highways England and its contractors, as well as with DfT, enables us to help them understand what they need to do differently to better meet road users' needs. We believe this would be much less likely to happen without deep understanding of road users' views and of the highways sector.

- Multi-modal

One of the benefits of having a specialist body with a multi-modal transport remit is that we can draw parallels across modes. We took our knowledge and experience with rail satisfaction surveys (NRPS) and used this to help develop a bus version (Bus Passenger Survey). The BPS is now seen as a valuable management tool by bus companies and is used to make decisions improving services for passengers.

Our rail and bus experience has certainly helped us to hit the ground running when it comes the Strategic Road Network. We have mirrored work on priorities²³ and are developing a new, more comprehensive satisfaction survey. We can already see similarities with rail in terms of disruption management and the provision of information; and between the five-year planning cycles for rail and road, not least in the development of user-centric performance metrics. This demonstrates the importance for users of a co-ordinated approach where lessons across transport sectors are learnt and fed into decision makers.

This is not to suggest that the consumer landscape cannot change. For instance, we think that there are opportunities for us to work more closely with other bodies in order to improve the flow of information from the grass roots to the national level. This is something we will continue to work towards.

Transport isn't a traditional consumer market where people can vote with their feet if they don't like the provider. Governments/local authorities still make (or have influence on) many of the decisions that impact on users and, for rail and road in particular, fund much of the investment going in. All of which means that there are forces at play other than choice and competition when it comes to regulating the market. To this end we would reiterate our belief that transport in its widest sense

²³ Road users' priorities for improvement: car and van drivers and motorcyclists
Road users' priorities for improvement: heavy goods vehicle drivers

(users, operators, regulators and governments) benefits from having specialist multi-modal bodies that represent the end user. We are not aware of any obvious consumer detriment that comes from our multi-modal approach, nor can we identify an alternative model that would achieve the same overall benefits for transport users. Indeed, there is a risk that significant structural change could undo some of these benefits, not least on roads where we have recently invested time and money building up user representation.

3. Alternative Dispute Resolution (ADR)

Q5. Are there problems with the current provision of ADR in these sectors?

Q6. If yes, what are these problems and how can provision be improved?

Q7. Should the criteria for allowing the use of the word Ombudsman be strengthened and if so how?

We note that Transport Focus and London TravelWatch have been included in the table on page 10 showing dispute resolution provision. This table gives the impression that we operate ADR and that this is, unlike the other sectors listed, not binding or compliant with the Directive. It also seems to have overlooked bus complaints – managed by Bus Users UK²⁴ outside London and London TravelWatch within.

We think it is important to point out that Transport Focus does not operate ADR on rail. At the time of the implementation of the Directive we were in discussions with BIS and DfT but the decision was made by DfT to continue with existing pre-ADR arrangements pending a more detailed review at some point. The railway has Ombudsman Services as an ADR provider but has decided not to use it.

What we offer is a form of non-binding mediation in which we act as the passenger's advocate in taking up cases with the industry. This is at the 'appeal' stage after the passenger has tried and failed to resolve the issue with the operator. As mentioned in the introduction, this is a licence requirement.

We deal with around 2500-3000 appeal cases a year. The four main causes are:

- The act of complaining (no response or an inadequate response)
- train service performance
- Fares, retailing
- Penalty fare/unpaid fares

We have no formal powers to compel operators to act or to compensate. If there has been a breach of conditions/regulations then we can escalate this but in our

²⁴ <http://www.bususers.org/complaints/make-a-complaint/>

experience these are rare cases – they have usually been identified before the case reaches us.

We survey those who contact us. We achieve just over 70% satisfaction levels with our mediation.

We are more than happy to resume discussions with DfT/BIS over a more formal role with ADR. This would, though, need to reflect any additional resourcing and clarification of any impact on our existing work. We are not an impartial body - our remit, as can be seen above, is to be on the side of passengers so it will be important that any quasi-legal function does not impinge on our advocacy role.

The call for evidence asks for views on the existing system of ADR. To some extent the crux of the problem is that the directive did not make ADR compulsory – it has to exist, it has to be mentioned, but it does not have to be used. So a lot of time and effort has been spent simply getting train companies to put a statement on a website.

There are options on how ADR could be introduced:

- Train companies could use an existing ADR provider. This could offer a binding decision in cases of ‘deadlock’ but does open up the prospect of an even more complicated complaint environment. Could we potentially end up with a situation whereby certain complaints go to that body while others still come to us (i.e. an ‘I want some compensation for a late train’ could go to the ADR body while a ‘why is my train late’ case could come to us)? In our experience complaints frequently combine both elements. It will be important not to complicate arrangements.
- Both London TravelWatch and ourselves have suggested an alternative model based on the existing Bus Appeals Board (BAB)²⁵. The BAB has a passenger representative appointed by Bus Users UK, a bus industry representative appointed by the Confederation of Passenger Transport (CPT), and an independent chairman. It has no statutory powers but all members of CPT are required, under their terms of membership, to abide by BAB decisions. In the event of a bus company not abiding by a decision, the matter is referred to the Traffic Commissioner. The Traffic Commissioner grants the bus company its licence to operate and, ultimately, has the power to fine them or even to disqualify them. We think that something similar could be established for rail – though we are mindful of the need not to extend the overall time taken to resolve complaints.

Either model, however, has to first get round the ‘optional’ nature of the Directive.

²⁵ <http://www.bususers.org/complaints/bus-appeals-body>

One of the benefits of the advocacy body having a complaint function is that it can identify trends/issues that need addressing, ensuring that this data is used to deliver better outcomes for passengers. We have two good examples on rail that show how complaints can translate into action and improvements:

- Revenue protection
In 2011 we noticed a growing number of complaints from passengers being penalised for ticketless travel – in many instances quite unfairly. We looked closely at the processes and protections surrounding ticketless travel and published our concerns and recommendations²⁶. This generated considerable media interest which we were able to use to push for change. We monitored progress in a further report²⁷ and used our relationships to maintain pressure on the industry. As a result individual train companies have made some improvements while DfT issued a public consultation proposing changes designed to address some of the more systemic issues we identified. DfT is currently considering responses. This demonstrates a direct link between complaints and ministerial consideration.
- Passenger Assist (assistance for passengers with disabilities)
We received complaints about booked assistance not actually being provided. While few in number they had serious implications. To get a better sense of the scale and impact of the issue we undertook mystery shop research of the passenger assist service. To do this we recruited passengers with disabilities to make actual journeys and to record their own experiences²⁸. The first wave of the research identified the main problem areas and we were able to use our working relationships at a sector level to push for improvements. Subsequent waves of the research show that the service has improved in some areas but that more is still required. ORR is now monitoring delivery and publishing results of the industry's own satisfaction surveys (one of our original recommendations); something that will continue and maintain improvements.

4. Consumer Data

Q8. Is there scope to make consumer complaints data in these sectors easier to access and more widely available?

Q9. If yes, how can this be achieved and what protection should be included?

To help ensure that our complaint data is as useful as possible we, along with London TravelWatch, send our complaint data to ORR on a regular basis. They consolidate this to give a national picture which is published alongside train

²⁶ Ticket to Ride. May 2012

²⁷ Ticket to Ride – an update, February 2015

²⁸ Three waves: 2008, 2011 and 2014

company's own complaints data to give a national perspective and to inform reviews of complaint handling procedures.

In addition we provide access to more detail on the complaints we handle via the open data section on our website.

Complaints data provides valuable information that can be useful in identifying some trends and issues. However, we believe that care must be taken when interpreting this data. Some train companies are better than others at publicising and welcoming contact from passengers – e.g. by handing out complaint forms; while other complaints can be linked to higher value journeys where there is a greater likelihood of generating compensation. For these reasons we argue that complaint data should be viewed as part of a suite of data on performance and passenger satisfaction rather than in isolation – it is this suite of data, alongside Transport Focus' specialist experience and relationships which are critical in delivering benefits for passengers.

5. Consumer Switching

This is not directly applicable to transport.

In conclusion, we welcome the opportunity to respond to this submission. We believe that the consumer voice must be at the heart of decision making. We also believe that we are uniquely placed to do this. Our emphasis on research has enabled us to develop detailed, specialised expertise which gives our work real credibility with stakeholders. Our well-developed relationships across the transport sector then give us access to decision makers so that we can use our work to deliver benefits for the consumer. Our multi-modal remit also means that we can identify and promote best practice across the different modes.

We would be happy to discuss this response in more detail should you find it helpful.

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