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**Secretariat memorandum**

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Agenda item 9

CA012

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**Bus complaints overview**

**1 Purpose of report**

- 1.1. To provide members with information relating to the current legislative environment, practice and monitoring of bus complaints handling in London, and how London TravelWatch wishes to influence the agenda.

**2 Recommendations**

- 2.1. That the report is received for information and to consider what information in relation to this area of work members would wish to receive in future.

**3 Introduction**

- 3.1. Vernon Everitt, Managing Director of Marketing and Communications at Transport for London addressed the January meeting of Casework Committee. At that time, it was agreed that to ask him to come back to a future meeting to discuss progress on complaints handling issues.
- 3.2. Issues raised at that meeting included concerns about the length of response times to appeal cases; the lack of reference numbers on complaints logged on the TfL website which meant it was difficult for passengers to chase cases; and the proposed programme of casework audits.
- 3.3. Since that meeting, the Board has decided to focus particularly on issues affecting buses during this year. Therefore, in response to this, the Chief Executive approached Beverley Hall, Head of Surface Transport Communications at Transport for London to address a meeting of the Consumer Affairs Committee with particular reference to the issues raised in bus complaints.

**4 Bus complaints resolution**

- 4.1. Confidence in the complaints process
- 4.1.1. London TravelWatch has had meetings with senior Transport for London (TfL) staff on the complaints process and how complaints are dealt with by TfL.

4.1.2. London Buses' own complaints policy document lays out the key principles to guide how staff should handle complaints. As outlined in the attached document, London Buses state that their aim is to "Promote feedback from our customers ensuring that information provided is used within the business to improve the provision of transport in London". In responding to customers, they state that they will pursue the following principles:

- Easy to access
- Timely
- Confidential
- Informative and Simple
- Fair and Effective
- Monitored and audited

4.2. Commentary on issues arising from London TravelWatch's casework

4.2.1. By its very nature, London TravelWatch tends to deal with complaints from passengers who consider that London Buses has not met their expectations. While sometimes this may be due to unreasonable expectations, or due to their very nature are difficult to resolve, we are often contacted by passengers who express concerns about failures of procedures or where services have failed to meet their expectations.

4.2.2. The types of complaint received are many and varied. Nevertheless, typical themes include staff behaviour, incidents on buses, accessibility, gaps in service, compulsory bus stops and compensation :

#### **Staff behaviour complaints**

The nature of bus travel means that passengers tend to have more interaction with staff. This, perhaps inevitably, leads to more complaints about staff behaviour on buses than on other modes. Unfortunately, the complaints process can be unsatisfactory for passengers. In particular, passengers are frequently frustrated that bus operators are unable to trace drivers who they complain about or when they have are not entitled to any information about how they complaint was taken up with the member of staff.

#### **Incidents on buses**

We are contacted by passengers who find that police are not always called out to serious incidents on buses or that, when they make a report, the CCTV footage cannot be found. All London Bus services have CCTV cameras which are able to record footage of incidents on buses. This is particularly helpful in detecting anti-social behaviour and assaults on buses as well as some staff complaints. Unfortunately, due to the system's capacity, CCTV records on buses tend to be retained for a shorter period than CCTV images at stations or the roadside. As a result, we can find that requests fail to be made in time or are not acted upon, leading to potentially serious issues failing to be addressed.

#### **Accessibility problems**

Despite claims that the failure rate for wheelchair ramps is less than 1%, this does not reflect the experience of passengers. We were contacted by a passenger who raised a catalogue of problems relating to wheelchair ramps not being deployed

due to drivers being unable to operate ramps effectively, driver failing to pull up to the kerb or failing to stop for disabled passengers.

### **Gaps in service**

We deal with a number of complaints from passengers who experience large gaps between services. We recognise that road works and congestion make bus services particularly vulnerable to delays and, as a result, services can be turned before they reach the end of a bus route. London Buses' performance statistics show the average performance on a route over a period and therefore it is difficult for us to judge whether such issues are isolated to a particular time of day or part of a route. Nevertheless, in the passengers' view, London Buses have failed to meet their expectations in providing the advertised service for their journey.

### **Compulsory bus stops**

London Buses changed their policy a couple of years ago to make all stops compulsory rather than have a combination of compulsory and request stops. We have recently had a number of cases relating to drivers failing to stop at bus stops. This can be frustrating to passengers awaiting services but, if buses speed past stops, it is not always possible to identify the relevant buses and therefore drivers.

### **Compensation claims for incidents caused by third parties**

One longstanding issue is the vexed question of claims from passengers who suffer injuries on buses in circumstances where the driver (or company) is not liable because blame rests with a third party who is unidentified or cannot be pursued. This is a particular issue where bus drivers may brake sharply to avoid an accident. For car passengers, the Motor Insurance Bureau deals with such claims, but there is no right to compensation for bus passengers. During 2006, TfL contacted us to state that they were considering creating a fund from which ex-gratia goodwill payments could be made. Since the initial discussions, however, we have not been made aware of any further progress. In addition, Transport for London has opposed draft EU legislation which would introduce a compensation regime for such cases.

- 4.2.3. Other issues raised by members have included complaints acknowledgements, 0845 numbers, turnaround times, redress policies, audits and demographics :

### **Complaint acknowledgements**

Concerns have been expressed that when you register a complaint online, you get a standard acknowledgement containing only a reference number. Therefore, in the event that you fail to get a response or an adequate response within a reasonable time, you are provided with no record of your original complaint or the content of it. We have asked Transport for London to consider improving the acknowledgements they give as we consider that this would increase confidence in the complaints process.

### **0845 numbers**

An informal audit of call handling by our casework team in November last year showed that during the month they dealt with around 1200 telephone calls, of which more than half related to buses. Of these, less than a tenth related to appeal complaints, and there were a high number of general enquiries or initial complaints that we then had to refer to London Buses. While part of our role is to signpost members of the public, the high number of inappropriate calls on buses has a significant impact on staff workload (as well as misleading passengers who think

we can deal with initial complaints). Feedback from callers suggests that one of the main reasons we are contacted instead of London Buses was that our telephone number is a standard 020 number while London Buses' is an 0845 number which tends to be more expensive to call than it is to call a land line from a mobile phone.

### **Turnround times**

London TravelWatch's data from the last six monthly Casework team reporting period (October 2008 to March 2009) showed that around 60% of London Buses' cases received a substantive response within 20 working days, and around 90% received a substantive response within 40 working days. We recognise that, in investigating a case, London Buses may have to involve a bus garage or await a staff interview for instance. Nevertheless, we are keen to examine ways in which timescales for responses can be reduced.

### **Redress policies**

Historically, in comparison with other transport operators, London Buses and bus operators have been reluctant to use gestures of goodwill to help resolve complaints. We have also found that there are differences between operators, but where an operator has chosen not to provide a gesture of goodwill, London Buses do not tend to do so on their behalf. We consider that passengers do not recognise the distinction between companies such as Arriva, London United or East London, and consider that they are using London buses. Therefore, perceptions of poor service tend to reflect on London Buses rather than the operator. We understand that London Buses are currently reviewing their redress policies and it would be useful to discuss progress on this issue.

### **Audit**

London TravelWatch has carried out audits on complaints handling by a number of transport operators. Over the last few years, in conjunction with Passenger Focus, we have visited customer services departments to obtain an overview of the style and content of correspondence sent to complainants. London TravelWatch carried out an audit on Transport for London's Oyster card division last year, and would like the opportunity to visit London Buses again to follow up on the audit carried out some years ago.

### **Demographics**

Members are interested to know more about who complains about services and whether they are representative of London's diverse community. It may be that people who complain about their bus service are likely to back up anecdotal evidence that it is people from more affluent socio-economic backgrounds who complain about public services. It would be useful to know what analysis London Buses has undertaken of the types of passengers who complain, the geographic dispersal of complaints and whether this has any impact on the types of issues raised or how they contact London Buses.

## **5 Improving passengers' experiences**

- 5.1. We consider that the advent of mystery shopping, quality incentive contracts, CCTV records, Oyster records and iBus have improved the quality of London bus services and should enable them to be more accountable both to London Buses

and the passenger. If harnessed correctly, we believe that these methods can assist in the resolution of passenger complaints. For example, monitoring could be undertaken of what proportion of CCTV requests are successful or where a passenger has been unable to identify which bus they were, their Oyster records could be checked to get the time and date of travel.

- 5.2. We want to ensure that the passenger experience of bus travel meets the highest expectations, but that should they raise a comment or complaint about a service, that their comments are taken seriously. Where an investigation takes place, we consider that it is helpful for as much information as possible to be made available to the passenger to ensure that they have confidence in the system. Currently, it is sometimes unclear to complainants (and to London TravelWatch) who provides the resolution to their complaint and to how much leverage London Buses has to ensure that an operator responds appropriately.

## **6 Equalities and inclusion implications**

- 6.1. The report includes a request to London Buses for more information on the types of passengers who complain to them about bus services, which we hope will assist us in our own analysis of the representativeness of complainants.

## **7 Legal powers and financial implications**

- 7.1. Section 248 of the Greater London Authority Act 1999 places upon London TravelWatch (as the London Transport Users Committee) a duty to consider – and, where it appears to it to be desirable, to make representations with respect to – any matter affecting the services and facilities provided by Transport for London which relate to transport (other than freight) and which have been the subject of representations made to it by or on behalf of users of those services and facilities. Section 252A of the same Act (as amended by Schedule 6 of the Railways Act 2005) places a similar duty upon it in respect of representations received from users or potential users of railway passenger services provided wholly or partly within the London railway area.

## **8 Financial implications**

- 8.1. This report does not give rise to any financial implications for London TravelWatch.

## **9 Recommendations**

- 9.1. That the report is received for information and to consider what information in relation to this area of work members would wish to receive in future.

# Surface Transport Customer Services Complaints and Feedback Policy

Approved by David Brown, MD Surface Transport

Signed: 

Date: 29<sup>th</sup> May 2009

Version 1.0

## **Purpose**

This policy sets out the principles for handling complaints and feedback in Surface Transport Customer Services.

## **Definition**

Customer complaint and feedback is defined into four categories:

- Complaint – which is any expression of dissatisfaction with Surface Transport’s service, staff or policies
- Query – this could be a general or specific request for information. Requests under the Freedom of Information Act 2000 are handled in accordance with the statutory procedure
- Commendation – which is an expression of approval for Surface Transport or its services
- Suggestion – an idea submitted to Surface Transport with the aim of improving our services

## **Organisational Scope**

Surface Transport is the integrated body responsible for the Capital’s surface (public) transport system. Its role is to implement the Mayor’s Transport Strategy across Surface Transport modes, improving the quality of service, increasing the number of passengers on Surface Transport services and improving accessibility to the Surface Transport services for mobility-impaired passengers and young people.

Surface Transport Customer Services manages:

- London’s Buses
- Streets
- Public Carriage Office (PCO)

Surface Transport is committed to providing consistent, high quality services and values customer feedback.

## **Surface Transport Complaints and Feedback Policy Statement**

“Promote feedback from our customers ensuring that information provided is used within the business to improve the provision of transport in London”.

### **Policy Content**

This policy outlines Surface Transport’s commitment to managing complaints well through a complaints system which is:

- Easy to Access
- Timely
- Confidential
- Informative
- Simple
- Fair
- Effective
- Monitored and Audited

### **Easy to Access**

We will make access to our customer services teams as easy as possible, whether by written correspondence, e-mail, fax, telephone, web-form or other methods. We are committed to making communication with us as easy as possible. We will assist people who have difficulty in contacting Surface Transport due to disabilities or language problems.

We will ensure Surface Transport customers are confident about making a complaint. We will provide support where necessary and inform customers of help they can get from outside Surface Transport.

### **Timely**

All feedback will be dealt with in a timely manner, adhering to published timescales and guidelines.

We will keep you informed about the different stages of the contact process.

For all enquiries we will provide a response or update within a maximum of 15 working days. We will acknowledge all written enquiries within 2 working days.



## **Confidential**

We will keep all personal details confidential, in accordance with applicable legislation and internal guidelines. However, we may share information within Surface Transport to the extent necessary to resolve an issue or to be able to offer a reply.

You are not required to provide your details however in such case, we will resolve the issue but will not be able to provide you with any feedback.

## **Informative and Simple**

We will aim to eliminate jargon and to communicate in a clear and concise way. Our response to your feedback will:

- Aim to answer all points of concern
- Be factually correct
- Aim to find positive, workable solutions

If you are dissatisfied with our response, we will tell you what options are open to you.

## **Fair and Effective**

We will ensure that all customer complaint and feedback is handled in a fair and effective way. This means that we will deal with complaint and feedback without bias towards any particular group or body and that we will be consistent and thorough in our approach.

## **Monitored and audited**

We will log and monitor all feedback to ensure that we adhere to our promises under our published policies and our obligations under any relevant legislation.

We will also ensure that customer feedback is passed on to senior managers and other members of staff, in order to help improve services.

## **Redress**

As part of valuing customers and customer feedback, we will seek to provide appropriate redress when required.

## Escalation

Our operating procedures will provide for escalation of matters that are unresolved or where the nature of the feedback requires it.

Our operating procedures will also provide for escalation of matters to external organisations. Depending on the issue this will either be the London TravelWatch, the Local Government Ombudsman or the Information Commissioner. Contact details are given below:

<b>London TravelWatch</b>	
<b>Phone:</b>	020 7505 9000 (09.00 to 17.00 Mon to Fri)
<b>Fax:</b>	020 7505 9003
<b>E-mail:</b>	<a href="mailto:enquiries@londontravelwatch.org.uk">enquiries@londontravelwatch.org.uk</a>
<b>On-Line:</b>	<a href="http://www.londontravelwatch.org.uk">www.londontravelwatch.org.uk</a>
<b>Post:</b>	London TravelWatch, 6 Middle Street, London, EC1A 7JA

<b>Greater London Authority</b>	
<b>Phone:</b>	0207 983 4000 (24 hours)
<b>Fax:</b>	0207 983 4057
<b>Minicom:</b>	0207 983 4458
<b>On-Line:</b>	<a href="http://www.london.gov.uk">www.london.gov.uk</a>
<b>E-mail:</b>	<a href="mailto:mayor@london.gov.uk">mayor@london.gov.uk</a>
<b>Post:</b>	Greater London Authority, City Hall, The Queen's Walk, More London, London, SE1 2AA

<b>Local Government Ombudsman</b>	
<b>Phone:</b>	0845 602 1983 (09:00 – 16:30 Mon - Fri)
<b>E-mail:</b>	<a href="http://www.lgo.org.uk/reqinfo.htm">http://www.lgo.org.uk/reqinfo.htm</a>
<b>Post:</b>	Local Government Ombudsman, 10th Floor, Millbank Tower, Millbank, London, SW1P 4QP

<b>Information Commissioner</b>	
<b>Phone:</b>	01625 545745
<b>E-mail:</b>	<a href="http://www.ico.gov.uk/Global/online_enquiries.aspx">http://www.ico.gov.uk/Global/online_enquiries.aspx</a>
<b>Post:</b>	The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**How to Contact Us:**

<b>Surface Transport Customer Services (London Buses)</b>	
<b>Phone:</b>	0845 300 7000 (08:00-20:00 Monday to Friday)
<b>Fax:</b>	0845 600 6241
<b>E-mail:</b>	<a href="mailto:customerservices.buses@tfl.gov.uk">customerservices.buses@tfl.gov.uk</a>
<b>Post:</b>	London Buses Customer Services, 4th floor, Zone G7, Palestra, 197 Blackfriars Road, London SE1 8NJ

<b>Surface Transport Customer Services (London Streets)</b>	
<b>Phone:</b>	0845 305 1234 (24 hours a day)
<b>Fax:</b>	0845 600 6241
<b>E-mail:</b>	<a href="mailto:londonstreets@tfl.gov.uk">londonstreets@tfl.gov.uk</a>
<b>Post:</b>	London Streets Customer Services, 4th floor, Zone G7, Palestra, 197 Blackfriars Road, London SE1 8NJ

<b>Surface Transport Customer Services (Public Carriage Office)</b>	
<b>Phone:</b>	0845 300 7000 (08:00-20:00 Monday to Friday)
<b>Fax:</b>	0845 600 6241
<b>E-mail:</b>	<a href="mailto:coms@pco.org.uk">coms@pco.org.uk</a>
<b>Post:</b>	Surface Transport Customer Services, 4th floor, Zone G7, Palestra, 197 Blackfriars Road, London, SE1 8NJ
<b>General queries (excluding comments or complaints):</b>	<a href="mailto:enquiries@pco.org.uk">enquiries@pco.org.uk</a>
<p>Passengers wishing to submit a comment or complaint to the Public Carriage Office (PCO) about taxi or private hire services in London should use the online form or use the contact details above</p>	

You can also report issues to us via the Help & Contact section on [www.tfl.gov.uk](http://www.tfl.gov.uk)

**Other Useful Contacts**

<b>London Travel Information London Underground</b>	
<b>Phone:</b>	020 7222 1234 (24 hours a day)
<b>Textphone:</b>	020 7918 3015
<b>E-mail:</b>	<a href="mailto:travinfo@tfl.gov.uk">travinfo@tfl.gov.uk</a>

<b>Oyster Customer Service Centre</b>	
<b>Phone:</b>	0845 330 9876 (08:00-20:00 seven days a week)
<b>Post:</b>	Oyster card helpline, 1st Floor, Albany House, 55 Broadway, London SW1H 0BD

<b>London Underground</b>	
<b>Phone:</b>	0845 330 9880 (08:00-20:00, seven days a week)
<b>Post:</b>	Customer Service Centre, London Underground, 55 Broadway, London SW1H 0BD

<b>Congestion Charging</b>	
<b>Phone:</b>	0845 900 1234
<b>International:</b>	+44 20 7649 9122
<b>Textphone:</b>	020 7649 9123 (if you have impaired hearing)
<b>Post:</b>	Congestion Charging, PO Box 2985, Coventry, CV7 8ZR

<b>London River Services</b>	
<b>Phone:</b>	0207 941 2400
<b>On-Line:</b>	<a href="https://www.tfl.gov.uk/tfl/contact/default.asp?type=river">https://www.tfl.gov.uk/tfl/contact/default.asp?type=river</a>

<b>Tramlink</b>	
<b>Phone:</b>	0207 941 2400
<b>On-Line:</b>	<a href="https://www.tfl.gov.uk/tfl/contact/default.asp?type=river">https://www.tfl.gov.uk/tfl/contact/default.asp?type=river</a>

<b>Dial -a- Ride</b>	
<b>Phone:</b>	0845 999 1 999 (9am-4pm, Monday to Friday)
<b>Fax:</b>	020 7027 5801
<b>E-mail:</b>	<a href="mailto:Dar.generalenquiries@tfl.gov.uk">Dar.generalenquiries@tfl.gov.uk</a>
<b>Post:</b>	Dial-a-Ride, Progress House, 5 Mandela Way, London SE1 5SS

<b>Victoria Coach Station</b>	
<b>Phone:</b>	0207 730 3466
<b>Mobility Assistance:</b>	0207 824 0000
<b>On-Line:</b>	<a href="https://www.tfl.gov.uk/tfl/contact/default.asp?type=vcs">https://www.tfl.gov.uk/tfl/contact/default.asp?type=vcs</a>

<b>TfL Customer Relations</b>	
<b>Phone:</b>	020 7222 5600 and ask to be put through to TfL Customer Relations
<b>Fax:</b>	020 7027 9914
<b>E-mail:</b>	<a href="mailto:enquire@tfl.gov.uk">enquire@tfl.gov.uk</a>
<b>Post:</b>	23rd Floor Empress State Building, Empress Approach, London SW6 1TR