
Secretariat report

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Agenda item 15

CA039

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Audits of TfL's Surface Transport Customer Services

1 Purpose of report

- 1.1. To summarise the various audits of Transport for London's (TfL) Surface Transport Customer Services that took place in 2009.

2 Recommendations

- 2.1. That members consider this report;
- 2.2. That officers meet with representatives of TfL's Surface Transport Customer Services to discuss London TravelWatch's comments on the audits;
- 2.3. That a further report is brought to this Committee in November 2010

3 Background

- 3.1. The complaints handling audit of London Buses in November 2006 was one of the first such audits undertaken by London TravelWatch. A summary of the audit findings, together with TfL's response, is set out in Appendix 1. For some time now we have been trying to get permission to undertake a second audit to see what changes have been made since then. TfL has made it clear that it does not want us to conduct a further audit because it is already the subject of other audit scrutiny, and is not sure what value a further audit adds at this time, and because it conducts its own audits of individual bus operators. However it has now agreed to make these audit reports available to us on a confidential basis so that London TravelWatch can be reassured about the rigor of its approach, it is also prepared to consider any suggestions we might make as to how its own audit processes could be improved.
- 3.2. Accordingly we have been provided with copies of :
 1. The BSI full reassessment of the complaints management system to the requirements of ISO 10002- 2004;
 2. TfL's internal quality assessment audit report;
 3. Summaries of TfL's bus operator audits.
- 3.3. As members are already aware, TfL has made substantial changes to its overall complaints handling systems over the past eighteen months and the impact of this is

evident in each audit. These changes are summarised in the quality assessment audit report.

“In August 2008 the team underwent a staged move into a new building in Southwark (Palestra) . . . A new telephony system was also introduced at this time. In November 2008 a pan-TfL project, to implement the new Systems Applications Processes Customer Relationship Management System (SAP CRM) saw the system go “live” within the Surface Transport Customer Services department. This followed on from an earlier roll out within London Underground and the Travel Information Contact Centres.

This introduction of the SAP CRM is part of TfL’s longer term vision to integrate all of its existing customer services teams into one central department. Providing a single platform on which to manage and report all of its customer relationship information is a key part of that integration plan. Since its launch within ST Customer Services however there have been some problems experienced with the performance level of the system and its reporting capability. This has had a negative impact on both productivity levels and the monitoring of performance.”

4 Information

4.1. Report on the BSI full reassessment of the complaints management system to the requirements of ISO 10002- 2004

In the management summary to this report, the author confirms that Surface Transport has been operating a complaints management system to the requirements of ISO 10002-2004 for a number of years and that the system is mature in its execution, is managed well and is operated by trained and competent staff. He believes that much good work has been done in the transition from the previous long serving Respond Complaints Management System (CMS) to the new SAP CRM processes and that, whilst some teething problems were still in existence when the report was compiled, there were plans to resolve outstanding issues. Recertification was recommended. More details of the report findings are set out in Appendix 2.

4.2. TfL’s internal quality assessment audit report

There is a corporate internal audit team that undertakes annual audits, and we received a copy of their audit of Surface Transport Customer Services which took place in March 2009. This included updates on developments since the previous report in August 2008. It reported on progress against issues raised at the previous audit and concluded that the areas assessed were effective. However it noted that the reporting and performance issues arising from the move to the new SAP CRM were having a significant adverse impact, albeit temporary, which Surface Transport was doing its best to rectify urgently.

4.3. The report’s key findings indicate the seriousness with which the organisation takes the audit process, as indicated by the following observations:

“Complaints handling framework – There is no evidence that the views or input from customers has been taken into consideration when establishing the policy and objectives for the complaints handling process.

Planning and design – The new CRM system is unable to provide sufficient, accurate management information at present and is running at a slow speed. This is having a negative impact on productivity levels as well as performance management and management review activities.

Operation of complaints handling process – The automatic acknowledgement message that is sent out to customers who submit a complaint via electronic methods, is not providing the same level of information as the written acknowledgement letter. The automatic acknowledgement message does not give details of how the complaint will be dealt with or the response times that the customer can expect. The report also observed that a particular case had not been responded to by the bus company for some months, but had not been escalated to a higher level as defined in the procedure.

Maintenance and improvement – The post audit action planning process is managed by the Delivery and Compliance Team and appears to work very well. There has been good progress made in addressing the issues raised at previous audits.

Members will be pleased to note that a full debriefing of the audit report was held and actions agreed and assigned with appropriate targets. The next internal quality audit was due to take place in February 2010.”

4.4. Summary for all bus operating organisations of TfL’s audit of complaints handling and adherence to the code of practice audit 2009

Surface Transport undertook audits of 15 bus operating organisations during March / April 2009 and reported its findings by company, including feedback on the support offered by Surface Transport and a table of major / minor non-conformities with the Code of Practice for complaints handling. This summary is reproduced in Appendix 3 with the data anonymised.

Members will be pleased to note that the majority of bus operators :

- a) were found to have either adopted the London Buses Complaints and Feedback policy or implanted their own version;
- b) have senior management responsible / accountable for overseeing customer service contracts and staff have clearly defined roles and responsibilities for day to day administration of customer contacts;
- c) monitor and endeavour to respond to customer contacts within the timescales – although only 6 operators managed to meet the deadlines consistently;
- d) display the latest Customer Services contact details on their website and posters on buses;
- e) were meeting the required TfL standard when providing responses to complaints; where standards were not being met in some instances, action was being taken to improve the situation;

f) have updated their processes in line with SAP-CRM, and had been given refresher training on it;

g) several operators had introduced initiatives and improvements to help improve the customer experience.

- 4.5. On a less positive note, the audit discovered that, with regard to the adoption of compatible complaint handling processes, whilst the majority of operators have established customer service processes, some had none, and some were not up to date.
- 4.6. It was important to note that, at the time of the audits, bus operators were unable to produce reports from SAP-CRM due to technical problems that were expected to be resolved in June 2009. This was a significant issue that needed to be addressed.
- 4.7. Each bus operator had completed a questionnaire based on the current version of the Code of Practice, and had discussed the issues raised during the audit visits. The significant issue for all operators was the lack of a proper electronic reporting system, as already mentioned. Other issues had been raised with Customer Services for its attention.
- 4.8. On reviewing the audit's findings on individual bus companies, it was reassuring to note that the auditors appeared to have been thorough in their assessments, and had pointed out a particular company's failings/areas for improvement where necessary. The audit report for each individual bus company provided an audit action plan which included the issue, the owner, the management response and status. It appears that the audit process is taken very seriously by both Surface Transport and the individual bus companies, and that Surface Transport is keen to get all the companies to introduce the SAP-CRM system so that there can be a consistent approach to complaints handling, and reporting.
- 4.9. However, unlike the audit reports that London TravelWatch undertakes, there are no details of the individual complaints that were sampled by Surface Transport in its assessment of each bus company's performance. Therefore, it is not possible, from the reports we have been provided, to see what particular issues were raised with any individual company. This means that it is not clear whether issues, such as how staff complaints are investigated by the bus company - which has exercised London TravelWatch for some time – have been raised by Surface Transport.

5 Conclusions

- 5.1. On the whole, these on-going audits of Surface Transport - both external and internal - and the audits of the individual bus companies, appear to be thorough and to include appropriate recommendations, follow up actions and monitoring. Therefore, it would seem to be inappropriate to press Transport for London/Surface Transport any further to allow London TravelWatch to undertake its own separate audit of London Buses' complaints handling.

- 5.2. Instead, London TravelWatch will be pleased to receive future copies of these audit reports on a confidential basis.
- 5.3. However, the issue of how individual bus companies deal with staff complaints remains unresolved, partly because the audits undertaken by Surface Transport do not report the details of the individual complaints reviewed. London TravelWatch looks forward to resolving this issue in discussion with Surface Transport.
- 5.4. It is vital to maintain a dialogue with Surface Transport on the issues raised in London TravelWatch's original 2006 audit, as well as on the continuing improvements being made to the complaints handling. Therefore, London TravelWatch welcomes Surface Transport's willingness to participate in such a dialogue.

6 Equalities and inclusion implications

- 6.1. No specific equalities implications for London TravelWatch arising from this report.

7 Legal powers

- 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.

8 Financial implications

- 8.1. There are no particular financial implications for London TravelWatch arising from this report other than to note that it is more cost effective to receive and comment on TfL's own internal and external audit findings than to carry out its own audits.

Appendix 1

Summary of the findings of the audit undertaken on 8 November 2006, together with the response from TfL

Of the 30 cases randomly selected, the auditors concentrated on 21, which were broken down into 6 areas; Driver Conduct (7); Complaints from residents concerning bus stops and stands near their property (4); General complaints covering several issues with delays to service and overcrowding prominent (4); Requests for information (3); Access issues – wheelchair and pram users (2); Follow up to previous complaint (1).

The auditors found that all complaints were speedily acknowledged by a standard letter, in most cases within 24 hours, and that, with the exception of complaints about driver conduct [see below] final replies to complainants were of a very good standard with care and attention normally taken to address the issues raised.

They found that many replies were personalised and addressed in a friendly manner that suggested London Buses were keen to help. On several occasions offers were made to facilitate meetings between bus managers and disgruntled passengers so a dialogue could be opened to help sort out problems – this was particularly so in one case concerning a powered-wheelchair user.

London Buses appear to have a problem with persistent (and perhaps unjustified) complaints from residents living near to bus stops and bus stands who often make repeated and unreasonable complaints about the mere existence of buses. Despite the aggressive tone of these complaints, the auditors believed that London Buses took them seriously and expend a lot of energy trying to find a middle-way between operating a public transport system while keeping residents happy.

As non-specific complaints about buses can be very difficult to respond to, when there is little focus in the complaint, the auditor were pleased to note that, for the most part, London Buses took time over these type of letters and did all they could to supply information that would be of help to the complainant. Requests for information were either replied to swiftly with the appropriate advice or else the customer was directed to someone else who could help.

Driver conduct formed a large part of the casework received by London TravelWatch, and two of the 7 reviewed by the auditors were noted to be handled in a competent way and one showed an exemplary investigation and reply from the bus operator involved.

The auditors were concerned that four of these staff complaints were impossible to review properly as there was no copy of any response from the bus operator concerned. London Buses had simply passed the complaint on and then closed the case with no follow up to ascertain the action taken by the bus operator. One case concerned us as insufficient information had been taken at the call centre to make action possible.

Auditors' Conclusions

They felt it was important to first note that the audit revealed that London Buses were very good at responding to complaints and issues that were within their direct control.

However, it was also believed that they should do more to manage complaints that required investigation and response from operators. These were often specific events which most personally affected passengers, often issues around driver behaviour.

The auditors recommend that London Buses should look to improve their procedures insofar as they managed how well operators were investigating and responding to complaints made against them.

Follow-up

London TravelWatch met with Transport for London to discuss the draft report. TfL accepted the auditors' main concern, and stated that they had recognised the problem themselves following an internal review. They explained that they were in the process of implementing a significant change in their systems that would take many months to implement.

In July 2007 TfL provided the following statement updating the progress made on the implementation of the system changes required to address the concerns raised by the audit.

At the time of the review undertaken by London TravelWatch (November 2006) concerns were raised regarding some of the reviewed cases, particularly where no evidence was available to show the response to the customer. The conclusion therefore reached by London TravelWatch was that Surface Transport Communications should do more to ensure a good standard of response to complaints carried out by Bus Operators. The quality of the responses from Bus Operators to customer complaints is an issue that is well recognised and is being actively worked on by Surface Transport Communications.

It should be noted that the sample of cases reviewed by London TravelWatch were a very small percentage of cases that are dealt with by London Buses and therefore are not necessarily representative. The concerns raised with the sample cases have been addressed where appropriate.

The intent of this response to the London TravelWatch review report is to outline activities that have already taken place and are being planned in the near future to continuously improve the procedures and quality of responses to complaints and issues:

- *Set up of the Delivery and Compliance function in November 2005. This section sits outside the operations of Customer Services to specifically deliver improvements and ensure compliance by Surface Transport Communications and their partners including Bus Operators. Included in this is a specific role to work closely with Operators to improve their performance in the customer services area.*
- *Annual audits are carried out on Bus Operators to assess compliance to the Code of Practice for managing customer complaints which is part of their Framework Agreement with TfL. The 2006 audit overall showed a 6% improvement in performance compared to the 2005 Pre Audit. Action plans for each Operator are requested to outline how the Operator is intending to address recommendations for their Audit and their compliance to the Code of Practice. The 2007 Audit is in*

preparation and will be focusing on not just procedural compliance but elements of quality with sample cases to be reviewed for appropriateness of response.

- *Communication and training activities occur on a regular basis. Of particular note are the Operator Workshops which are held every 6 months to share information about new initiatives and to share good practice.*
- *A major milestone has recently been achieved in the rollout of a new technology to support the handling of complaints from Customer Services through to Bus Operators. This Bus Operator Portal enables online access to the Surface Communications case management system which enables full visibility of how complaints are handled from start to finish. This reduces duplication of effort and leads to improved quality. Note that this technology was not in operation at the time of the London TravelWatch review and the procedure was reliant on email. The Portal requires cases to be closed by TfL ensuring that responses are made to customers so can be seen by TfL and Operators.*
- *TfL is undertaking a significant technology initiative to integrate and provide a consistent platform for customer service handling across the organisation. This initiative is known as the Customer Services Integration Programme (CSIP). Surface Transport Communications is actively involved at all levels. Bus Operators will also be taking up this technology when the system delivery is carried out in Surface next year as it will replace the Bus Operator Portal technology. This will provide a more reliable and transparent workflow from TfL to Bus Operating Companies.*
- *An Operator Engagement Plan is in development to coordinate and plan activities that continue the improvements to customer service handling with Bus Operators. This will address Communications and Stakeholder Engagement, Continuous Improvement, Compliance and CSIP Operator Readiness.*

Appendix 2

Complaints Management System - Areas Assessed & Findings

The documented complaints management system is set up in three main publications:

- (a) The Surface Transport Customer Services Complaints and Feedback policy dated 29 May 2009 issued by MD Surface Transport.
- (b) The Surface Transport Customer Services Complaints Handling Guidelines dated 17 October 2008.
- (c) The Surface Transport Customer Services Complaints Handling Processes dated 6 July 2009.

The author's observation on the documented complaints management system states (inter alia) "A review of the last visit report confirmed that the observations recorded were seen as improvement opportunities and have been adopted and implemented."

The report states that management review meetings are required to assess, at senior management level, the effectiveness of Complaints Management System through continual monitoring and to promote improvements. They are held every quarter against a comprehensive agenda; the outputs being minuted and published via a shared drive for all staff to view. However, the author noted that the last meeting's minutes (15/6/09) appeared to be scanty on a number of issues, which he felt to be surprising due to the sound knowledge base and extensive operational experience in house, which should have helped in the specification of the new SAP software.

The author observed that top management had recognised the failure of Business Information through SAP to provide continuity of data for complaints and business monitoring, and had set up a working group of users with IT to resolve the problem.

The internal audit programme had been maintained to the planned arrangements, and a thorough and comprehensive report had included a number of opportunities for improvement. All issues had been recorded on the master register for corrective action with target dates and assigned ownership, providing good traceability for all issues raised from both internal and external audits. The department had initiated audits of service providers to ensure that Service Level Agreements were being effectively maintained as far as a complaint handling was concerned, e.g. bus operators and to ensure their systems were compliant and effective.

Complaints processing and resolution The report states that the Customer Services Department handled 327000 enquiries during the previous year, in the form of telephone calls, letters, emails and faxes, of which 162755 had been recorded as complaints – all of which had been addressed and monitored for quality and adherence to the processes prescribed. The Call Centre Manager for Buses and Streets had confirmed that some verbal complaints were recorded by call centre agents onto the SAP complaints handling process and assigned to an appropriate owner for resolution if not addressed immediately. Neither the Public Carriage Office nor Parking Control Notices were included in the audit, but they could be combined in the future.

Inbound written complaints are handled by the Business Administration correspondence team, including Incoming Primary Service Tickets (served on buses or streets for resolution from other TfL departments, the Ombudsman or London TravelWatch). The author observed that the inbound activity for Primary Service Tickets should be included in the documented process.

The report sets out the four stages to resolution following escalation where the complainant remains dissatisfied. However, members will wish to note that the author recommended that the four stages/levels of resolution be more clearly expressed in the processes, but that the sample of complaints studied showed that the process was generally working well, although there was room for improvement.

More importantly, the author observed that the issue of interim letters to complainants, when resolution was delayed, needed “sharper follow up”. Also, in assessing the processes, a number of those issues, not resolved at stage 3 (i.e. by the Head of Service/MD), which had been referred back by the Ombudsman (LGO) or London TravelWatch, had been sampled and showed that the traceability of actions was difficult with untimely/unrecorded follow up. The author states that, whilst the introduction of SAP-CRM, plus new staff in post, may have been contributory, supporting records of actions were important as objective evidence in the resolution process, with timely follow up actions also being recorded.

Training and development The report covers the training and induction of new Customer Services staff, including the use of Buddying, the provision of NVQ Level 2 learning and achievement in Business Administration.

The appointment of a Knowledge Management Manager was an initiative to develop, retain and cascade knowledge gathered in and for the business. Liaison with other TfL businesses was felt to be an important part of this role in the transfer of information, and to heighten awareness for the overall professionalism in response to FAQs from the public. This was anticipated to reduce the impact on Customer Services and to assist in lowering the number of complaints through lack of knowledge or information at initial enquiry stages.

The BSI report included a programme of continuing assessment and a full reassessment of the Complaints Management System and its effectiveness in compliance to the requirements of ISO 10002-2004, and to review the scope of registration following the results of the Customer Service Integration Project (CSIP).

Appendix 3

Summary of TfL's Surface Transport audits of bus operating organisations

Bus Operator (names redacted)	Major Non- Conformity	Minor Non- Conformity	Observations	Date Final Report Sent
1	0	1	5	23 June 2009
2	0	2	2	23 June 2009
3	0	2	3	23 June 2009
4	0	2	3	23 June 2009
5	0	4	4	23 June 2009
6	0	4	3	23 June 2009
7	1	2	4	24 June 2009
8	2	4	6	23 June 2009
9	3	3	6	13 July 2009
10	0	1	2	23 June 2009
11	0	2	2	23 June 2009
12	0	3	6	26 June 2009
13	1	7	6	24 July 2009
14	4	3	5	26 June 2009
15	1	0	0	28 August 2009

The summary of each individual audit is appended hereto.

1a. Summary by operator - with more than 10 routes

Operator Summary Audit Findings

1	Standard of complaints handling was found to be of a very good standard. Time and effort has been spent since the 2006 audit, to implement policies and procedures. The Operations director has overall responsibility for Customer Services, which demonstrates the level of importance the organisation places on this area. The organisation has focused on areas for improvement and implemented a number of initiatives to help improve the customer experience. Need BI access to produce meaningful report.
2	Standard of complaints handling was found to be very high. The organisation has maintained its high standards since the last audit in 2006. here is a clear focus on quality in relation to the customer experience. The organisation has held a number of targeted and effective training and development events to educate drivers and increase the standard of customer services offered. Need BI access to produce meaningful reports.
3	Standard of complaints handling was found to be of a good standard. The organisation needs to stay focused on complying with timescales and to document its updated procedures following the implementation of SAP CRM. Need BI access to produce meaningful reports.
4	Standard of complaints handling was found to be of a good standard. The organisation needs to document its procedures and stay focused on complying with timescales. Need BI access to produce meaningful reports. Following a period of change, the team's priority was to stabilise their Customer Services processes and procedures. Going forward, the focus will be on maintaining quality standards by working with garages to improve investigations related to service control and reliability.
5	Standard of complaints handling was found to be of an acceptable standard. The Service Planning Manager was recently given responsibility for overseeing the Customer Service policies and procedures, which has raised the profile within the organisation. The organisation implemented a number of the recommendations following the 2006 audit and is now concentrating on introducing standard processes and procedures across all garages. Need BI access to produce meaningful reports.

6	<p>Standard of complaints handling was found to be of an acceptable standard prior to summer 2008. The new Customer Services Officer and Contracts Manager have spent time and effort implementing Customer Services policies and procedures since their arrival in summer 2008. The 2006 audit recommendations have now been addressed and the focus is on ensuring processes are embedded following the implementation of SAP CRM. Although timescales for responses were being met, the random sample of responses reviewed were not in line with London Buses quality standards. This had already been recognised and steps taken to address this. The organisation has introduced various initiatives to help improve the customer experience, with focus on service and reliability issues. Need BI access to produce meaningful reports.</p>
7	<p>Standard of complaints handling was found to be of a competent and solid standard. One area of the Code of Practice is not observed, in that calls and correspondence received is dealt with directly and not passed on to TfL to put into SAP CRM. The organisation is undergoing major changes in the customer services operation and the team will be expanding. Although this may be initially disruptive, it gives the customer services team the opportunity to make improvements and streamline operations. Need BI access to produce meaningful reports.</p>
8	<p>Standard of complaints handling was found to be of a fair standard. Some of the recommendations have been implemented since the 2006 audit. However, Customer Services and complaints continue to be overseen at the Administration Manager level at both garages, which lacks an organisational overview by senior management. Staff changes at both locations appear to have contributed to inconsistent ways of working. One area of the Code of Practice is not observed, in that calls and correspondence received are dealt with directly and not passed on to TfL to put into SAP CRM. Random sampling found that one of the buses did not display the Customer Services contact details, so procedures need to be reviewed for this. Having a member of the senior management responsible for Customer Services overall with an overview of the organisation, would help to address some of the problems being encountered and help towards enhancing the customer experience. Need BI access to produce meaningful reports.</p>
9	<p>Standard of complaints handling was found to be of a fair standard. The majority of key recommendations from the 2006 audit have not been addressed yet. Because of this, a number of areas of the Code of Practice are not observed. The accountability for complaint handling within the organisation has changed recently from Head Office to garage level, with the Chief Operating Officer now overseeing public complaints. The change in accountability appears to have given Customer Services more of a focus within the organisation. The organisation would not benefit from reviewing its Customer Services processes and implementing consistent processes across all garages. Need BI access to produce meaningful reports.</p>

1b. Summary by Operator - with less than 10 routes	
Operator	Summary Audit Findings
10	Maintains an effective complaints management system and complies with the Code of Practice. Policies and procedures are documented, with complaint trends being monitored to address any issues. Staff now in place to provide cover during holidays / sickness. Need BI access to produce meaningful reports.
11	The standard of complaints handling was found to be of varying quality. Process documentation is still under development. The organisation needs to focus on compliance with timescales and quality of responses. The organisation is working on improving its programs of reviewing and monitoring complaints and also ensuring staff involved have received the appropriate training. Need BI access to produce meaningful reports.
12	The standard of complaints handling was found to be of an acceptable standard. Some of the recommendations from the 2006 audit have been implemented, however policies, processes and procedures need to be updated following the implementation of SAP CRM and recent organisational changes. A review of referencing would be helpful to provide a more effective management trail for Customer contacts. The organisation also needs to focus on the quality of responses provided, to ensure standards are maintained. Need BI access to produce meaningful reports.
13	Standard of complaints handling was found to be of a fair standard. Some of the recommendations have been implemented since the 2006 audit, however, number of policies, processes and procedures are now work-in-progress due to recent changes within the organisation. The Head of Public Transport is now responsible overall for Customer r contacts, with Depot Managers being responsible at garage level for the day to day admin. One area of the Code of Practice is not observed, in that calls and correspondence received is dealt with directly and not passed on to TfL to put into SAP CRM. A review of roles, responsibilities and processes (which is underway) should help to provide focus on dealing with Customer r contacts within timescales and also ensure adequate cover is available in the event of absences. Need BI access to produce meaningful reports.

14	<p>The standard of complaints handling was found to be of a weak standard. The majority of the recommendations have not been addressed since the 2006 audit. The organisation will be formally adopting the London Buses Complaints and Feedback Policy (they have a local policy) and needs to document its processes and procedures. Following staff changes, the organisation needs to focus on ensuring Customer Service staff are trained and aware of the standards required and confident in using the new SAP CRM system. The appointment of the General Manager towards the end of 2008 who oversees Customer Services, should help to provide more of a focus to ensure standards are set and being met. The organisation has some work to do over the next few months, to ensure policies and processes are documented and in place for staff. Particular focus should be given to meeting the timescales for providing responses and the actual quality of responses sent out. Need BI access to produce meaningful reports.</p>
15	<p>The organisation is in a unique position in that it operates a route that is partly on the TfL network, but they have not signed the Framework Agreement that all other Operators on the TfL network have signed. Instead, they operate under a London Local Service Agreement. This means that they have not signed up to the Code of Practice and as such, are not bound by the clauses within it. Because of this, the audit only uses the Code of Practice as a benchmark of what is required to operate a complaints handling system. The company operates a structured complaints management system with sufficient focus on investigating and resolving customer complaints. Surface Transport will be recommending that the London Local Service Agreement includes the Customer Service Code of Practice, to promote consistency in Customer Service standards across all TfL routes. Feedback will be provided to the organisation on the outcome. If this goes ahead, we will then recommend a review of how Customer contacts are channelled and logged.</p>