

# TravelWatch NORTHWEST

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***Winner of CILT award for best practice in passenger transport***

***promoting quality public transport.....***

Mr John D Holmes  
 Office of Rail Regulation  
 One Kemble Street  
 London  
 WC2B 4AN

29<sup>th</sup> August 2014

Dear Mr Holmes,

## **Developing minimum core data for monitoring operators' CHP and DPPP performance**

TravelWatch NorthWest is an independent Community Interest Company representing the interests of public transport users in N W England. We give below our comments on this consultation -

***Question 1: Do you agree with ORR collating information produced by operators and publishing this as a minimum core set of data in respect of CHP and DPP outcomes?***

It is important to have this information available to be able to assess operators' aptitude at dealing with passenger complaints and satisfying the needs of disabled passengers.

***Question 2: Do you agree with our guiding principles to develop the core data set?***

We agree in general with these principles. We particularly stress the value of independent research, especially mystery shopping to build a picture of how well complaints have been dealt with and the experience of disabled travellers both with and without Passenger Assist journeys.

***Question 3: Do you agree with our proposal to establish a working group to support ORR in developing final core data set.***

We are happy with this.

**Question 4 (a): What are the strengths and weaknesses of the example measures and data proposed in annex 2?**

**Table 1 CHPs**

- 1) The measure of within 20 working days is reasonable but there should be a shorter timescale for an initial acknowledgement.
- 2) Average response times should ideally refer to both the initial acknowledgement and the average time for the substantive response.
- 3) We would stress the need for independent exercises from time to time, as well as initiatives from operators or a central operator body, to assess satisfaction with complaint handling.
- 4) We understand that Passenger Focus/LTW undertake an appeals closed measure. This could be independently audited on occasions.
- 5) A sensible distinction.
- 6) An important measure but measurement would not be straightforward. In some cases (e.g. timetable suitability) there may be no or insubstantial measures taken to resolve the complaint.

**Table 2 DPPP**

We agree there should be more consistent and regular data for use of the rail network by disabled people. In all measures proper attention should be given to those with hearing impairment with or without a hearing aid. It tends to be a forgotten disability.

- 1) & 2) It is essential to determine total Passenger Assist journey experience. The call back system is probably acceptable but again there need to be independent surveys undertaken periodically.
- 3) Operators should be able to demonstrate that they work with disabled groups on the suitability of station facilities, etc.
- 4) & 5) Agree. An important aspect is accessibility & assistance issues when rail replacement bus services are operating.
- 6) Clearly the general complaints data will include aspects related to disabled travel.
- 7) & 8) Agree
- 9) If the aim is to determine which operators are performing Passenger Assist well and which need to improve, the call back system and independent surveys will demonstrate this. The fault may lie with the booking operator rather than a (different) operator of a particular leg so perhaps a separate measure for cross-boundary assistance is required
- 10) Agree
- 11) A good point – more use could be made of websites and on line booking sites. Also a measure of the operator's interaction with disability/ senior groups (you do not have to be registered disabled to qualify for Passenger Assist).

**Question 5: Please propose any alternative or additional measures that should be considered, either to assess the quality of experience delivered to passengers or to monitor the amount or volume of activity.**

***Please explain how your alternative measures would work and the reasons for proposing them.***

We have already alluded to independent research and surveys. The use of mystery shopping is a useful tool for determining passenger experience.

Thank you for the opportunity to respond

Yours faithfully

*John A Moorhouse*

John Moorhouse  
Company Secretary