



Customer Advocacy

**ESCALATED COMPLAINT
PROCESS**

1 Introduction

PTV’s Customer Advocacy – Escalated Complaint Process offers Victorian public transport customers a free and effective avenue for escalating unresolved complaints about PTV and other public transport operators.

Our process is an integral part of the Victorian public transport industry’s broader complaint management model which encourages complaints to be resolved quickly by an operator’s/PTV’s frontline staff and also provides options for concerns to be escalated where customers are not satisfied with the initial response.

Figure 1: Victorian public transport industry’s complaint management model

Early resolution		
Frontline staff attempt to resolve the complaint immediately with the customer		
Operator’s/PTV’s Complaint Management Team		
Where a complaint is not resolved immediately, the operator’s/PTV’s Complaint Management Team will consider it further and, if necessary, conduct an investigation. If the customer is not satisfied with the response provided, they may escalate the complaint for further consideration.		
Escalation		
PTV Customer Advocacy	OR	Public Transport Ombudsman
The customer may choose to have their complaint reviewed by Public Transport Victoria’s Customer Advocacy team. If they remain dissatisfied following the PTV Customer Advocacy Process, they may still lodge a complaint with the Public Transport Ombudsman.		The customer may choose to refer their complaint to the Public Transport Ombudsman for external consideration (without going through the PTV Customer Advocacy Process first). The Public Transport Ombudsman is an independent dispute resolution body that can assist in the resolution of disputes about public transport in Victoria.

We encourage customers to provide Customer Advocacy with the opportunity to consider escalated complaints as the process gives PTV meaningful insights into the key drivers of complaints across the public transport network. As the system authority, PTV acts promptly to ensure problems raised in escalated complaints are addressed and steps are taken to improve services for public transport customers.

We are independent of operators and, whilst we are employed by PTV, operate as independently as possible from the rest of PTV. Customers may lodge unresolved complaints with the Public Transport Ombudsman (PTO) if they wish, and are not required to lodge a complaint with us first. If an escalated complaint remains unresolved after investigation by Customer Advocacy, the customer may still lodge a complaint with PTO.

2 Purpose

This document describes the Customer Advocacy Escalated Complaint Process. The Process reflects the requirements for effective complaint management set out in AS/NZS 10002:2014

3 Our jurisdiction

The Escalated Complaint Process is available to any public transport customer in Victoria who has an unresolved complaint with PTV or an operator. A complaint may relate to an operator's/PTV's products, services, staff or the handling of a complaint.

Before Customer Advocacy can consider a complaint, the operator/PTV must have had an opportunity to resolve the matter with the customer. We can only accept a complaint where the operator/PTV:

- Has offered a resolution that the customer does not accept; or
- Does not respond to the complaint within 7 business days of receipt, or within 3 business days if the complaint is categorised as Priority A or an Emergency.

We can consider complaints about the quality of customer service provided by Authorised Officers, but we cannot deal with complaints about the exercise of their statutory powers, such as the issuing of infringement notices.

We are not able to deal with complaints that are being, or have been considered by the PTO. If a customer lodges a complaint with the PTO during Customer Advocacy's investigation, we will immediately cease our investigation and advise both parties.

4 Guiding principles

Our Escalated Complaint Process aims to:

- Encourage and enable complaints where resolution has not been achieved with an operator or PTV;
- Manage escalated complaints effectively, efficiently and fairly; and
- Promote a culture across the network of learning from complaints and making improvements.

5 Lodging a complaint

Our Escalated Complaint Process is clear, easy to understand and accessible to all sectors of the community. We recognise that some people may have physical, mental or intellectual difficulties, limited language skills, or be unaccustomed to corporate culture. We are committed to ensuring that all members of the community, including those who require assistance, are able to raise concerns and participate fully in the process.

Escalated complaints may be lodged in a number of ways:

- Online:** submit a feedback form and tick the box marked "escalate my complaint"
- Phone:** 1800 800 007
- Mail:** PO Box 4724, Melbourne, 3001
- By TTY:** 9619 2727
- In person:** PTV Hubs at Southern Cross Station or 750 Collins Street

Customers may access our interpreter service by calling us directly on 1800 800 007 or through the National Relay Service <http://relayservice.gov.au/support/training/nrs-call-numbers/>

Customers with speech or hearing impairments can contact us directly on (03) 9619 2727.

Where a customer wishes to be represented by another person or group, we will accept the complaint and communicate with the representative once we receive the customer's consent.

Customers should provide the following information when lodging an escalated complaint:

- Name and contact details;
- A summary of the complaint;
- The outcome they are seeking;
- An explanation of the attempts made to resolve the matter directly with the operator/PTV;
- Any relevant correspondence or documents; and
- Any special assistance they require.

6 The Complaint Process

The Escalated Complaint Process is fair to all parties and ensures that complaints are dealt with objectively and without bias. The Process provides for complaints to be dealt with quickly and informally where possible. If we are unable to resolve a matter informally, we will conduct an investigation and issue a recommended resolution to the parties in writing.

6.1 Acknowledgement and Hold Notice

We acknowledge an escalated complaint, and provide the customer with a case reference number, within 24 hours of receipt. At this point, we also issue a Hold Notice on the operator/PTV to ask it to refrain from contacting the customer about the complaint until further notice. The Hold Notice does not prevent the operator or PTV from contacting the customer about unrelated matters.

Within the next 24 hours, we contact the customer to:

- Confirm the details of the complaint;
- Ask what they are seeking as a resolution; and
- Explain the complaint management process, including timeframes.

6.2 Negotiation

After contacting the customer, we advise the operator/PTV of their proposed resolution. If the operator/PTV accepts the proposal, the customer is advised and the complaint is closed.

If the operator/PTV does not accept the proposed resolution, it has five business days to investigate the matter and make a counter offer and/or outline its position.

Where a counter offer is made, and the customer accepts it, the complaint is closed.

6.3 Investigation

Where the customer rejects a counter offer, or no counter offer is made by the operator/PTV, we will conduct an investigation, which may take up to 5 business days.

If we cannot complete our investigation within 5 business days, we will advise both parties of the reasons for the delay and provide timeframe updates.

Complaints are considered fairly, objectively and without bias. Our investigation is independent of the operator's/PTV's initial internal investigation. We will have access to all information gathered during the initial investigation of the complaint, but will not be influenced by its findings. Operators/PTV and customers are required to provide any additional information that we may request, except for confidential information contained in an employee's personnel file, commercial in confidence information, or personal information that is not relevant to the complaint.

6.4 Recommendation

The findings of our investigation, including a recommended resolution, are set out in writing to both parties. The recommendation is not binding on either party.

In forming our recommendation, we consider the facts presented by both parties and where appropriate, will apply provisions of the following:

- Customer Charters and Compensation Codes;
- The Victorian Fares and Ticketing Manual; and
- Franchise Agreements between PTV and public transport operators.

Both parties have 5 business days to respond to the recommendation. If the operator/PTV does not respond within this timeframe, we send out a reminder.

If both parties agree to the recommended outcome, we confirm the outcome in writing and close the complaint.

Where one of the parties does not accept the recommended resolution, or does not respond to the recommendation, both parties are advised that the complaint has not been resolved. We advise the customer of their right to raise the complaint with the PTO and close the complaint.

Figure 2: Maximum timeframes

Actions	Business Days
Acknowledge complaint and provide case reference number	1
Discuss complaint with customer and confirm proposed resolution	2
Issue Hold Notice on the operator/PTV	1
Operator/PTV responds to Customer Advocacy regarding proposed resolution and makes counter offer if applicable	5
Customer Advocacy communicates the counter offer (if applicable) and/or its recommendation	2-5 days
Operator/PTV and customer decide to accept or reject the recommendation	5

7 Remedies

Escalated complaints may be resolved in a number of ways. Remedies will vary from case to case, but may include:

- An explanation;
- An apology;
- A change in decision, policy or procedure;
- A correction to published material or records;
- Taking or stopping action;
- A goodwill gesture
- Steps necessary to put the customer back in the position that they would have been in had the complaint not arisen (known as rectification);
- Financial compensation including a refund of money; and
- Public acknowledgement of a wrong;

Remedies should be provided to the complainant within 10 business days of an agreement being reached.

8 Learning and improving

Complaint data is an important source of information to measure the performance of the public transport network and improve operations. We regularly analyse complaint data to measure:

- The number and types of escalated complaints we receive;
- Complaint outcomes;
- Systemic issues and complaint trends; and
- Resolution timeframes.

We also conduct root cause analysis of complaints to identify their underlying causes and work with operator/PTV staff to help fix problems and prevent them from recurring.

9 Continuous improvement

We are committed to continually improving our Escalated Complaint Process. We:

- Regularly review the Escalated Complaint Process;
- Conduct benchmarking activities and keep informed about best practice complaints management; and
- Promptly implement changes to our procedures and/or practices to ensure they are aligned with best practice.

Figure 3: Customer Advocacy Escalated Complaint Process

Complaint Handling and Escalation Process

