Office of Rail and Road
Rail investigation report:

Govia Thameslink Railway: Provision of passenger information – May 2018 timetable change

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Contents

Executive Summary

1. This report sets out the findings of ORR's investigation into GTR's provision of passenger information relating to the May 2018 timetable; with particular reference to Thameslink and Great Northern services.

2. We wrote to GTR on 3rd October 2018[1] initiating this investigation following an ORR Inquiry[2] into the timetable disruption in May 2018 that found that information provided by GTR to its passengers was inadequate. The remit of the Inquiry did not require it to formally investigate whether there had been a breach of GTR's passenger licence information obligations in this area.

3. Our investigation has focused on GTR's duty to provide appropriate, accurate and timely information to enable passengers and prospective passengers to plan and make their journeys with a reasonable degree of assurance, including when there is disruption, and to do so to the greatest extent reasonably practicable having regard to all relevant circumstances.

4. We have considered GTR's provision of information in the lead up to the implementation of the May Timetable ('pre-20 May'), and during the period of disruption following the introduction of the 20 May timetable ('post-20 May').

5. In carrying out this investigation we have reviewed the information gathered by the ORR Inquiry. We have undertaken a detailed analysis of the GTR passenger experience pertaining to the timetable change to better understand the nature and impacts of the primary information failures. We have examined data collected in the course of our regulatory monitoring and we have met with GTR to discuss the provision of passenger information. Further evidence has also been gathered from the company via detailed information requests.

Our findings – pre-20 May

6. In the lead up to the implementation of the May Timetable ('pre-20 May') we consider that RailPlan2020 and the '*time of every train will change*' campaign was successful in raising awareness amongst passengers of the major change in the timetable, and was markedly different from usual timetable change communications. As noted in Chapter 2, 75% of passengers in our research were aware that the timetable was changing and the RailPlan2020 website attracted more than 800,000 hits. However, the personal impact of the timetable change

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[1] http://orr.gov.uk/__data/assets/pdf_file/0009/39357/concerns-with-gtr-compliance-with-passenger-information-obligations-2018-10-03.pdf

[2] http://orr.gov.uk/__data/assets/pdf_file/0018/39042/inquiry-into-may-2018-timetable-disruption-september-2018-findings.pdf

was not well understood by some passengers. Passengers who had familiarised themselves with RailPlan2020 were potentially unaware that some of the services would not be introduced until sometime after 20 May; almost three in five passengers believed that the new timetable would be introduced in full. On the last few days leading up to the transition weekend passengers were advised again to recheck the website. Passengers who had heeded the earlier messages and already worked out their plans for the new timetable, were faced with uncertainty as fewer trains were running on some lines.

7.   Nonetheless, we consider that GTR used the RailPlan2020 website, the '*time of every train will change*' campaign and a wide variety of communication channels (e.g. social media, print media, station advertising, stakeholder briefings as well as paper timetables, leaflets and more attention-grabbing marketing) to proactively disseminate the clear message that something significant was going to happen on 20 May. Prospective passengers were made aware of the change, had access to the expected timetable and reasonable efforts were made to keep passengers up to date as late changes were made in the period leading up to the 20 May. Based on the balance of information assessed and summarised here, we consider that GTR took reasonably practicable steps to provide appropriate, accurate and timely information to passengers prior to the timetable change on 20 May.

Our findings – post-20 May

8.   We consider that the exceptional circumstances that followed the introduction of the 20 May timetable meant that providing perfect advance information for all services was, from the outset, an impossible task. Evidence demonstrates that GTR's overriding focus throughout the period that followed 20 May was on providing as much capacity as it could to meet customer demand.

9.   Our guidance[3] to support compliance with the passenger licence obligations recognises that timetabling services and providing information to passengers are difficult, complex tasks. There is a balance to be struck between service delivery and the ability to provide appropriate, accurate and timely information for passengers during sustained periods of disruption. The licence condition is not intended to undermine the primary objective of providing the best available services for passengers.

10.   We accept that the immediate response to the timetable change required a period of reactivity as both the scale and severity of the disruption emerged. However, we consider that better passenger information should be a core element of the service recovery process and as time progressed an increasingly improving picture should

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[3] https://orr.gov.uk/__data/assets/pdf_file/0015/4353/information-for-passengers-guidance-on-meeting-the-licence-condition.pdf

have emerged. Against this context we consider that there is evidence to suggest that GTR failed to achieve an appropriate balance between service recovery and the need for appropriate passenger information to an unacceptable extent and duration throughout the initial phases of their Service Recovery Plan.

In particular, we found the following failings.

Aligning service recovery with passenger information obligations

11.   We consider that GTR took operational decisions with the best of intentions. Nevertheless, evidence from a range of internal and external sources revealed that while the continued efforts being made to improve and stabilise services at an operational level throughout Phase 1 and 2 of the Service Recovery Plan were having some success, the full benefit of this improvement was not felt in passenger outcomes due to the fact that it was often not supported by appropriate, accurate or timely passenger information.

12.   We consider that too often there was a failure in operational decision making to give adequate regard to the fact that running a train service (or rail replacement bus) is only helpful to passengers if they know when and where the service will arrive, where it is going and how long the journey will take. Moreover, the persistence of these information failures over such a sustained period of time, coupled with the lack of evidence as to the company developing any timely or proportionate response to these issues, lead us to conclude there had been a fundamental problem at both a strategic and functional level in aligning operational recovery with passenger information obligations.

Provision of 'Alpha list' and other journey information

13.   One of the key methods used by GTR to achieve stability in its service recovery process was the reduction in train services that resulted from the use of the 'Alpha list'. This required the identification of specific train services that it was unable to run and which could be removed from the timetable. Evidence demonstrates that the Alpha list was used, but was not clearly communicated to passengers between 6 June and 25 June (at which point GTR made PDF timetables available with the Alpha trains removed). The delay in sharing clear information regarding the cancelled Alpha trains meant that passengers were unable to identify trains that were never planned to run on a weekly basis and ones that were removed on a daily basis (from the Beta list). This is evidenced by consistent feedback from passengers regarding their frustration at having very little notice or certainty about which services would be running or cancelled for a prolonged period.

14.   GTR wrote to us stating that while the Alpha '*list proved to be generally consistent throughout the period to the 25 June 2018, this was not known at the time, the list was not believed to be a static one and was being constantly reviewed and at times*

was altered to reflect daily operational circumstances'. However, we also found evidence from internal documentation to indicate that the Alpha list was *'fixed,'* including a service recovery governance document that identified 326 trains as 'permanently removed' from the timetable from 11 June. We therefore consider that GTR's failure to clearly communicate known cancellations in a timely manner undermined the ability of prospective passengers to plan ahead and make informed journey decisions. The Alpha list information could have been published sooner than 25 June, which would have provided greater certainty to passengers about services which were not planned to run.

15.   The provision of rail replacement buses on some routes was a notable example where GTR had allocated significant resource to mitigate disruption and stabilise service provision, yet passengers were unable to take full advantage of this for a sustained period due to delays in making this information available in journey planners.

Day to day amendments

16.   A related aspect of GTR's Service Recovery Plan was that additional services were removed or cancelled on a day by day basis. This list of services was known as the 'Beta list'. The Beta list trains were removed individually by GTR staff in its Three Bridges Control Centre ('Control') on an overnight basis. This process led to very short notice changes to the timetable and a severe lack of certainty for passengers up until the point of travel. This is evidenced by GTR's advice to passengers to '*check as close to the time of travel as possible*' or to '*check immediately before travel*'. However, at times, trains in the process of being cancelled in systems were not removed until the train was due to have departed, leading to Customer Information System (CIS) screens showing '*delayed*' for a period before the train was subsequently cancelled.

17.   GTR persevered with this process until the introduction of an interim timetable on 15 July, in effect accepting the ability to make overnight and very late notice changes despite the impact that this had on the provision of passenger information for a prolonged period. Other day to day changes were utilised - for example reinstating Beta trains as crew and rolling stock became available - to increase capacity and thereby benefit passengers, but at times these changes were poorly executed resulting in what passengers referred to as '*ghost trains*'.

18.   Operational decisions taken and implemented to support the recovery process were, in many cases, to the detriment of providing passengers with appropriate, accurate and timely information to an unacceptable extent and duration. Deleting trains from the timetable rather than cancelling services in advance meant that services did not show as cancelled on journey planners or appear at all on CIS screens. Passengers were uncertain what services would run each day; travelling on a particular train on one day was no guarantee that it would run or be shown on station screens on the

next day. This added to the confusion for passengers who were still trying to come to terms with a timetable in which the time of every train had changed.

19.   There is substantial evidence to demonstrate the dedication and commitment of GTR staff in managing significant operational issues in difficult circumstances. However, on a day to day basis the issues described here, and elsewhere in this report, also served to undermine the ability of some frontline staff to have access to the information needed to assist passengers in making their journey.

20.   We consider that the cumulative effect of the factors described here manifested in the unacceptable passenger outcomes described in this evidence report and in the numerous examples of passenger information failures.

Next steps

21.   This investigation report has been published alongside a letter setting out the decision made by the ORR Board on what, if any, regulatory action should be taken following this investigation.

22.   In conjunction with this we have written to all train operators and Network Rail asking them to review their crisis management plans in light of the findings of our investigations into the provision of passenger information. We have also asked them to provide ORR with copies of their arrangements and related contingency plans to support passengers that require additional assistance to travel during periods of disruption (both planned and unplanned). We intend to work with the industry to identify and share good practice in this area.

23.   We will continue to monitor performance in this key consumer area and will hold operators to account to ensure that they meet their regulatory obligations.

1. Background

Summary

This chapter explains the background, remit and conduct of this investigation.

Introduction

1.1.   As the independent economic and safety regulator for Britain's railways, ORR plays a critical role in improving services for rail users. Our long-term vision for the mainline railway industry is a partnership of Network Rail (NR), operators, suppliers and funders working together to deliver a safe, high performing, efficient and developing railway. We are also the consumer authority for the rail industry as a whole. Our consumer function enables us to focus on basic rights for rail passengers such as access, information and redress.

1.2.   There are industry systems for compiling timetables and providing passengers with information. The System Operator (SO) works with Network Rail route teams and train operators to decide the best allocation of capacity and creates a base timetable twice a year (May and December) and co-ordinates short-term changes to it.

1.3.   Train operators are responsible for making accurate and timely information available to passengers to enable them to plan and make their journeys with a reasonable degree of assurance, including when there is disruption, to the greatest extent reasonably practicable having regard to all relevant circumstances. This requirement is set out in condition 4 of the Passenger Train Licence and the Statement of National Regulatory Provision (SNRP).

ORR Inquiry into the timetable disruption in May 2018

1.4.   On 4 June, the Secretary of State for Transport asked ORR to lead an Inquiry into why the railway system as a whole failed to produce and implement a satisfactory operational timetable in May 2018. The scope[4] of the Inquiry required it to gather evidence to draw conclusions and make recommendations as it saw fit. This included the impact on passengers, both in advance of and following the timetable change, especially in the areas served by Northern and GTR.

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[4] http://orr.gov.uk/__data/assets/pdf_file/0020/39035/may-2018-timetable-inquiry-annex-b-terms-of-reference.pdf

1.5.   The Inquiry focused on what actually took place when the timetable was introduced, compared to what should have happened. For GTR the Inquiry[5] found that information provided to passengers was inadequate which meant that passengers were unable to plan and make their journeys with any certainty.

1.6.   The remit of the Inquiry did not require it to consider whether GTR had met its licence requirements and therefore whether there had been, is, or is likely to be, a breach of a licence obligation. A determination of a breach of licence is subject to a different evidential test.

Enforcement remit

1.7.   Train operators are licence holders and are legally obliged to comply with the conditions of their licences. We are responsible for investigating potential licence breaches and taking appropriate enforcement action when a licence breach is identified. Licence enforcement is governed by a separate legal framework with clear procedures that are set out in our economic enforcement policy and penalties statement6. Further details of our legal framework and policy are set out in Annex D.

1.8.   This investigation has focused on the following key licence provision in the context of the May 2018 timetable change; it has not considered the root causes of the timetable problems as these have been covered in detail by the Inquiry.

Condition 4 of the train operators' licence SNRP

1.9.   Condition 4 of the Passenger Train Licence and the Statement of National Regulatory Provision (SNRP)[7], obliges train operators to secure the provision of appropriate, accurate and timely information to enable railway passengers and prospective passengers to plan and make their journeys with a reasonable degree of assurance, including when there is disruption.

1.10.   Train operators are also obliged by condition 4 to cooperate as necessary with Network Rail and each other to enable Network Rail to undertake appropriate planning, including when there is disruption.

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[5] http://orr.gov.uk/__data/assets/pdf_file/0018/39042/inquiry-into-may-2018-timetable-disruption-september-2018-findings.pdf

[6] http://orr.gov.uk/__data/assets/pdf_file/0018/4716/economic-enforcement-statement.pdf

[7] http://orr.gov.uk/__data/assets/pdf_file/0010/2233/lic-pass_SNRP.pdf

1.11. Train operators are under a duty to achieve the obligations in condition 4 to the greatest extent reasonably practicable having regard to all relevant circumstances, including the funding available.

1.12. To assist licensees we published guidance[8] to support the passenger information licence condition (condition 4) in passenger, station and network operator licences by giving more information about what is expected and how it will be enforced. Our guidance recognises that timetabling services and providing good information is a complex task. Paragraph 25 of the guidance states:

> …'The licence obligations are not intended to undermine the primary objective of providing the best available service for passengers. Making justified changes to the train plan to meet passengers' needs should not be conditional on providing perfect advance information about these. However, we would expect licence holders to use reasonable endeavours to get such information out as widely as possible and as quickly as possible. We will take circumstances into account during any assessment of compliance'

1.13. The licence requires a train operator to publish a code of practice which sets out how it will provide information to passengers, including during disruption. Most GB operators use the Association of Train Operating Companies (ATOC) code of practice[9] (the Code). The code requires the licensee to publish a "local plan" which sets out how the company will deliver the requirements of the code, and makes provision for an annual review of the local plan. We report on activity in our annual consumer report Measuring Up[10]. GTR's documents published on its website[11], show the last update in July 2017.

Regulatory context

1.14. The Network Code is a set of contractual rules incorporated into each track access agreement between Network Rail and all train operators. It covers those areas where all parties are obliged to work together to the same standards and timescales. The national timetable process is set out in the Network Code Part D.

1.15. In February 2018 the industry moved away from standard 'informed traveller' timescales, where amended timetables are made available to passengers at 12 weeks in advance (often referred to as T-12). The Network Rail System Operator reduced the

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[8] http://orr.gov.uk/__data/assets/pdf_file/0015/4353/information-for-passengers-guidance-on-meeting-the-licence-condition.pdf

[9] https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469771025

[10] http://orr.gov.uk/__data/assets/pdf_file/0003/28245/measuring-up-annual-rail-consumer-report-july-2018.pdf

[11] https://www.thameslinkrailway.com/-/media/goahead/gtr-all-shared-pdfs-and-documents/gtr_pidd_delivery_plan.pdf?la=en

notice period for changes to train times from 12 weeks to 6 weeks, with certain safeguards for passengers buying advance tickets.

1.16. ORR started to escalate monitoring and intervention activity around whether train operators and Network Rail were meeting their 'informed traveller' obligations in February 2018. Subsequently ORR's formal licence investigation into the root causes of the timetabling problems concluded that Network Rail had breached its licence in relation to its timetabling obligations[12].

1.17. In relation to the train operators and third party retailers, ORR also highlighted shortcomings particularly when these parties were selling advance tickets online. In February 2018 we wrote to Managing Directors at all train operators. The letter[13] set out three key principles that needed to be applied during the period when normal industry timescales were not being met. These principles covered transparency, the sale of advance tickets, and information provision when timetables remain unconfirmed:

- train operators should be open about the impact on all passengers of the challenges they face, and take responsibility for ensuring that their passengers can get the information they need to plan and make their journey as that information comes available;

- clear information on the availability of advance tickets, what is available and when, is necessary to help passengers plan journeys even when the timetable is uncertain; and

- timetable information should be correct as far ahead as possible, and where timetables are not confirmed information about their current status should be accurate and updated frequently.

1.18. Work continues[14] in this area as we monitor Network Rail's delivery of its T-12 recovery plan and work with train operators to ensure that the information provided on websites and mobile apps is as informative as possible. The Network Rail recovery plan for restoring T-12 timescales has now been extended to June 2019.

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[12] http://orr.gov.uk/__data/assets/pdf_file/0003/28425/2018-07-27-breach-of-timetabling-conditions-in-network-rails-network-licence.pdf
[13] http://orr.gov.uk/__data/assets/pdf_file/0020/27047/licence-condition-4-letter-to-toc-managing-directors-2018-02-23.pdf
[14] See ORR website for more information on the three strands of Informed Traveller work - http://orr.gov.uk/rail/consumers/rail-timetable-issues

Conduct of the investigation

1.19.   The purpose of our investigation was to establish if GTR did, or is doing, everything reasonably practicable to achieve compliance with its obligations set out in licence condition 4, as set out above.

1.20.   In particular, our investigation has focused on GTR's provision of appropriate, accurate and timely information:

■   to passengers and prospective passengers prior to the implementation of 20 May 2018 timetable; and

■   to passengers during the subsequent disruption i.e. following the implementation of the 20 May 2018 timetable.

1.21.   We have also considered the steps GTR has taken or is taking to:

■   address the issues, make improvements and recover;

■   whether there are any systemic issues; and/or

■   whether there are any mitigating factors which should be considered in this case

1.22.   In carrying out its investigation, ORR has drawn on source information provided as part of the ORR Inquiry into the May 2018 disruption[15]. This has provided a substantial evidence base and a considerable volume of information from a range of sources. This has been particularly useful in setting out the experiences and impact of the timetable change on passengers. We have also considered data that we routinely collect in our regulatory monitoring role for example information from complaints, and analysis of posts made by passengers on Twitter.

1.23.   We met separately with GTR to discuss the provision of passenger information and followed this up with a detailed Information Request requiring specific evidence to provide insight into:

■   the extent to which information that was available to GTR was shared with passengers to enable them to better plan and make their journeys;

■   the extent to which feedback from passengers and staff focused on information provision, the scale of such feedback and how such feedback was acted upon; and

■   the extent to which the provision of appropriate, accurate and timely information for passengers was central to the service recovery process.

1.24.   A follow-up request to GTR was required to obtain clarity where some of the original information requested remained outstanding; its capability to provide some of the

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[15] http://orr.gov.uk/rail/consumers/inquiry-into-may-2018-network-disruption

information was in question; and in one instance the determination made by GTR that the information requested was not relevant.

Structure of this document

1.25.   This document is structured as follows:

- in Chapter 2 we describe GTR's performance before and during the 20 May 2018 timetable change, and the experience of passengers who were affected by it;

- in Chapter 3 we set out the events prior to the 20 May 2018 timetable change and the provision of information to passengers by GTR about their services during this period;

- in Chapter 4 we set out the events following the introduction of the 20 May timetable and the provision of information to passengers by GTR about their services during the subsequent disruption; and

- in Chapter 5 we set out related observations arising from this investigation.

2. Passenger experience and impact

Summary

This chapter sets out GTR's service performance before and after the 20 May 2018 timetable change, and the experience and impact on passengers who were affected.

Introduction

2.1.   The ORR Inquiry[16] found that information provided to passengers was inadequate which meant that passengers were unable to plan and make their journeys with reasonable certainty.

2.2.   We have undertaken a detailed analysis of the GTR passenger experience pertaining to the timetable change to better understand the nature and impacts of the primary information failures they were exposed to. From there, this allows us to assess in Chapters 3 and 4 the extent to which these failures were a consequence of GTR actions and decision-making in relation to condition 4 of its Passenger Licence and SNRP.

Performance data

2.3.   The following chart shows the number of trains that GTR planned to run and the number that actually operated. Data is aggregated on a weekly basis. Figure 2.1 shows the increase in the number of services planned to run from 20 May 2018. However, the number of actual trains run is similar to that operated before 20 May. GTR operates approximately 3,500-4,000 trains a day so considering the percentage of trains operated illustrates the scale of the cancellations. Before the timetable change, GTR operated 94% of its planned services, something it was not able to achieve again in the timescales of the chart.

2.4.   Following 20 May, GTR removed some trains from the timetable and therefore the number of trains planned to run was reduced. Although the planned number was still higher than the pre-20 May number, the actual number of trains run was similar to or in some cases less than the pre-20 May number through June and into July 2018. The general improvement in the reliability of services following the introduction of the interim timetable on 15 July was also evident. It should be noted that trains deleted

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[16] http://orr.gov.uk/__data/assets/pdf_file/0018/39042/inquiry-into-may-2018-timetable-disruption-september-2018-findings.pdf

from systems are not counted as planned to run and are therefore not reflected in Figures 2.1 and 2.2.

Figure 2.1 – GTR trains planned to run vs. trains which ran
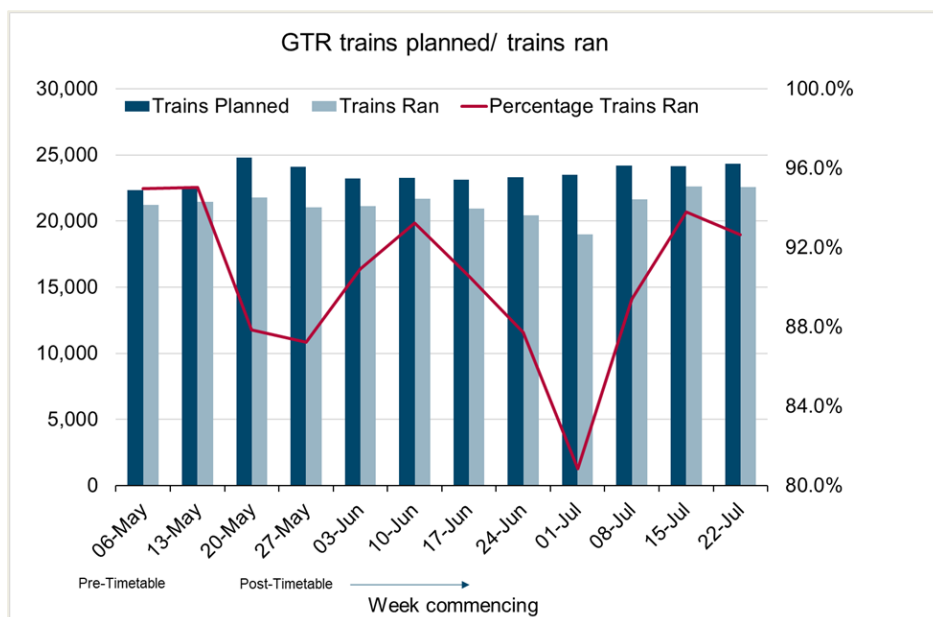

Note: the drop in performance on 5 July in Figure 2.1 was confirmed as being a NR signalling issue that closed Victoria for part of the day – this also explains the corresponding increase in NR delay minutes for that week in Figure 2.3.

Figure 2.2 - GTR trains planned to run vs. trains which ran table

GTR	Pre 20 May timetable change		Post 20 May timetable change								Interim timetable						
Week commencing	06-May	13-May	20-May	27-May	03-Jun	10-Jun	17-Jun	24-Jun	01-Jul	08-Jul	15-Jul	22-Jul	29-Jul	05-Aug	12-Aug	19-Aug	26-Aug
Trains Planned	22,331	22,585	24,799	24,095	23,221	23,250	23,120	23,311	23,514	24,190	24,130	24,348	24,388	24,473	24,558	24,389	24,282
Trains Ran	21,207	21,464	21,786	21,020	21,112	21,678	20,936	20,448	19,012	21,621	22,634	22,559	23,021	22,418	22,965	23,077	23,072
Percentage Trains Ran	95.0%	95.0%	87.9%	87.2%	90.9%	93.2%	90.6%	87.7%	80.9%	89.4%	93.8%	92.7%	94.4%	91.6%	93.5%	94.6%	95.0%

2.5.   The weekly delay minutes graph, Figure 2.3, shows not just the total amount of delay but also the cause. While the Network Rail (NR) caused delays (signal failures, etc.) is significant, the large increase in TOC-on-Self issues (where GTR has delayed its own services) is noteworthy, often three times as much as before the timetable change.

Figure 2.3 - GTR weekly delay minutes

GTR weekly delay minutes

(Legend: TOC-on-Self, TOC-on-TOC, Network Rail)

Week commencing (Pre-Timetable / Post-Timetable)
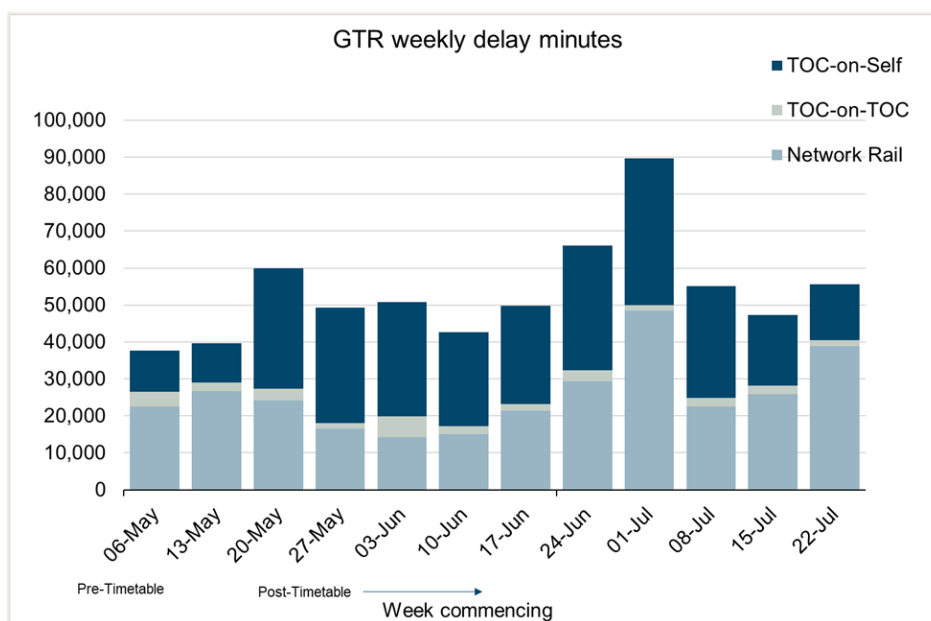
Experience of passengers

2.6.   As part of the Inquiry, ORR conducted two pieces of research with GB rail passengers to understand their experiences of the 20 May timetable change. Due to the fact the Inquiry research took place in June and July 2018 during the worst periods of disruption it meant that respondent (passenger) recall was optimised, thereby ensuring the accuracy of their answers. We re-examined the Inquiry research to produce a more detailed analysis of the specific responses of GTR passengers from that time period to provide us with a clearer and more focused understanding of their experiences. Our analysis is set out below.

2.7.   The first research piece involved the commissioning of a specialist research agency, GfK[17], to undertake quantitative and qualitative research into the experiences of both passengers and staff who were directly affected by the events surrounding the 20 May timetable change[18]. The research methodology included:

- ■   quantitative surveys with 255 GTR passengers;

- ■   two qualitative focus groups (comprised of 6-8 participants) with GTR passengers; and

- ■   two qualitative tele-depth interviews with GTR rail staff.

2.8.   The passengers surveyed were a mix of commuters, leisure/business travellers and passengers with disabilities across a range of routes on the GTR network. This

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[17] GfK has since been taken over by Ipsos MORI.
[18] The final research report produced by GfK can be viewed here:
http://orr.gov.uk/__data/assets/pdf_file/0004/39037/may-2018-timetable-inquiry-annex-d-orr-customer-research.pdf
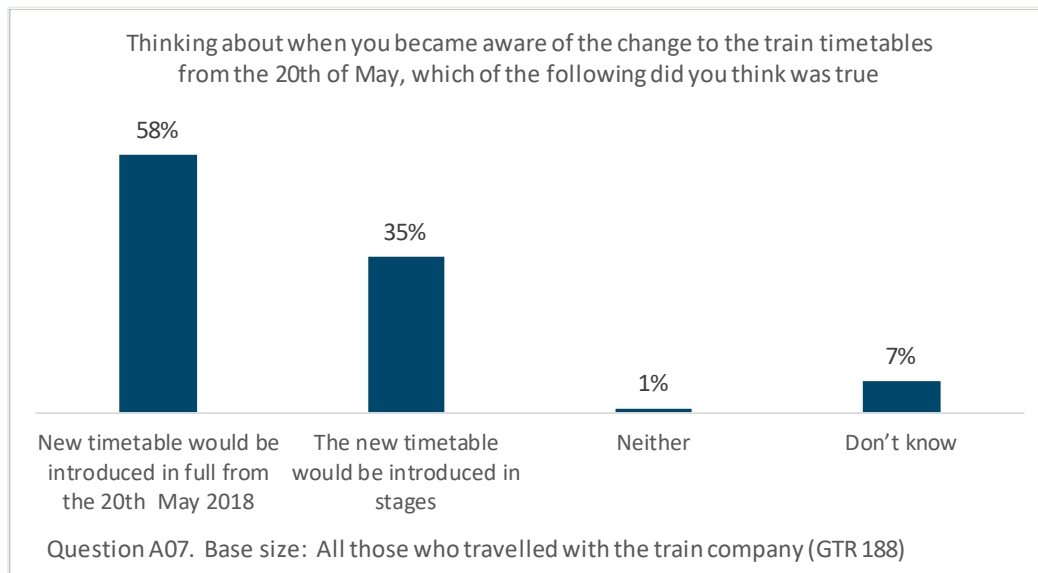
provides insight into the different types of experiences of GTR passengers before and after the 20 May timetable change.

2.9.   ORR also conducted its own research with GB rail passengers affected by the 20 May timetable change via an online survey. This produced 1,573 responses from GTR passengers (comprised of 1,008 responses by passengers travelling with Thameslink and 565 with Great Northern)[19].

GTR passengers' awareness of the timetable change

2.10.   Pre-20 May, GTR was effective in communicating to their passengers about the introduction of a new timetable on 20 May, with 75%[20] of passengers being aware of a change. This followed the successful '*everything will change*' campaign and introduction of the new RailPlan2020 website.

2.11.   The first possible indication of an information failure arose regarding the more detailed nature of the changes. Of those GTR passengers aware of the upcoming timetable change, almost three-fifths (58%) believed the full timetable would be introduced from 20 May compared to around one-third (35%) who were aware that GTR would not be introducing their new timetable in full from this date.

Figure 2.4 – Understanding of the timetable change

Thinking about when you became aware of the change to the train timetables from the 20th of May, which of the following did you think was true

New timetable would be introduced in full from the 20th May 2018	The new timetable would be introduced in stages	Neither	Don't know
58%	35%	1%	7%

Question A07. Base size: All those who travelled with the train company (GTR 188)

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[19] In this ORR survey respondents were asked to identify the train company they had intended to travel with and had the option of selecting more than one train operator e.g. they may have been undertaking a multi-leg trip. However, in the interests of accuracy we have refrained from reporting on those questions where we were unable to adequately attribute the responses to GTR journeys. We have however included the qualitative responses as they were directly attributable to either Thameslink or Great Northern.

[20] See slide 12 of GfK research report in footnote 18.

GTR passengers' experiences and perceptions of information provision following the timetable change

2.12. Figure 2.5 below shows a majority of passengers who experienced disruption[21] whilst travelling with GTR post-20 May were dissatisfied with the key elements of information provision.

Figure 2.5 – Satisfaction with key elements of information provision

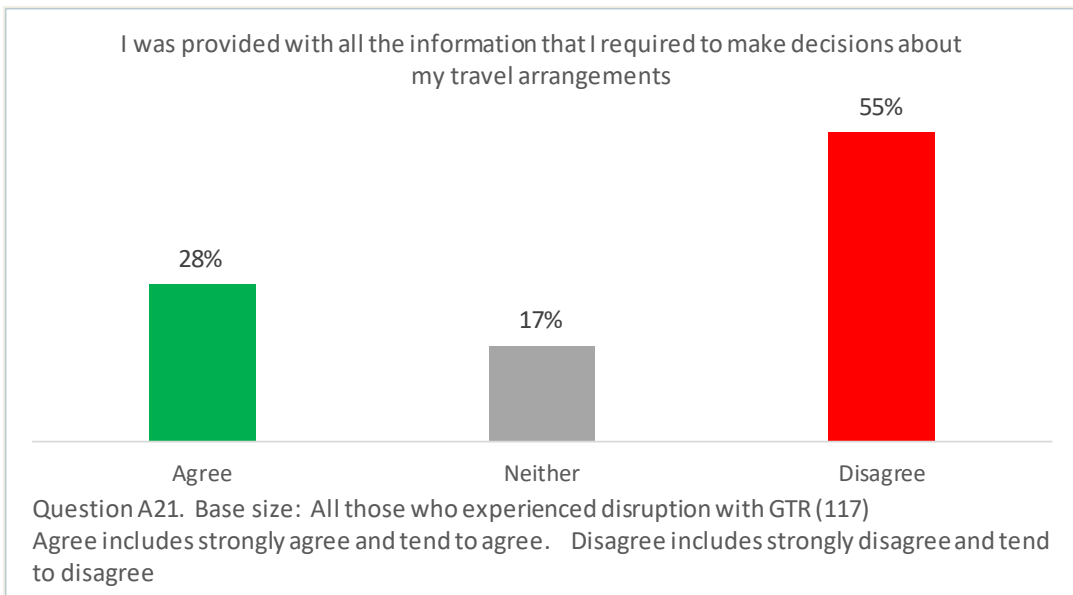Now thinking about the times you experienced disruption, since the 20th May, how would you rate the train company on each of the aspects below:

	Net Satisfaction	Net dissatisfaction
Amount of information	23%	56%
Accuracy of information	31%	53%
Usefulness of information	27%	51%
Speed information provided	25%	56%

Question A18. Base size: All those who experienced disruption with GTR (117) Responses above show net satisfaction (very well and fairly well responses) and net dissatisfaction (poor and fairly poor)

2.13. In order to test the impact of these apparent information failures, those passengers were then asked what effect this had on their journey planning. This revealed a majority of them (55%) did not consider they had been provided with sufficient information to inform their decision-making with regards to their travel arrangements.

Figure 2.6 – Provision of information to inform travel arrangements

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[21] Figures 2.5 – 2.8 are based on respondents who stated they experienced disruption only, or most frequently, with GTR. A11: *Which train company were you travelling with when you experienced this disruption? If experienced disruption with more than one train company please tell us which train company you experienced disruption with most frequently.*

I was provided with all the information that I required to make decisions about my travel arrangements

28%	17%	55%
Agree	Neither	Disagree

Question A21. Base size: All those who experienced disruption with GTR (117)
Agree includes strongly agree and tend to agree.   Disagree includes strongly disagree and tend to disagree
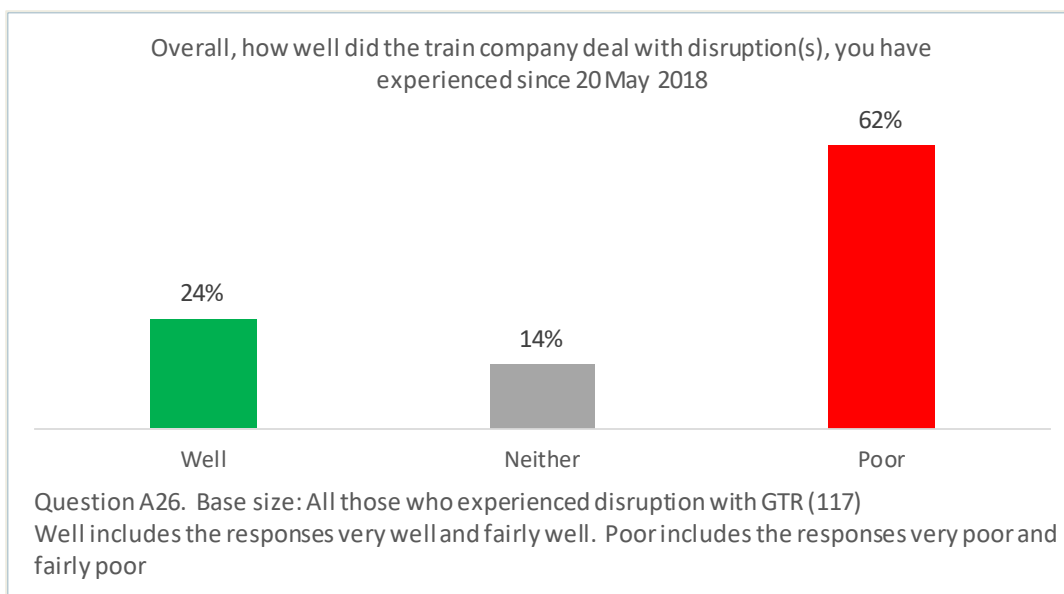
2.14. The chart below illustrates GTR passenger experience of staff availability at stations during disruption. While this shows that staff were often available to help, our analysis of passenger qualitative feedback indicates that even when staff could be located they often did not have any additional information to share with passengers.

Figure 2.7 – Availability of station staff during disruption

Were station staff available to help passengers during disruption?

53%	14%	33%
Yes	Don't know	No

Question A22. Base size: All those who experienced disruption with GTR (117)
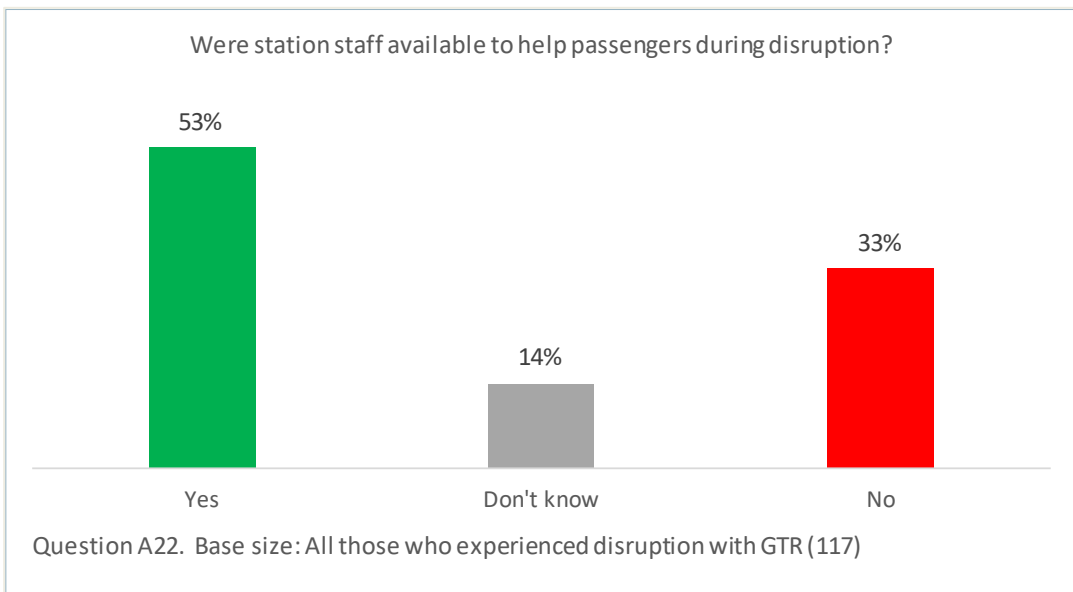
2.15. Overall, almost two-thirds (62%) of GTR passengers felt the operator had handled the disruption they had experienced poorly compared to less than a quarter (23%) who felt they had handled it well.

Figure 2.8 – Passenger perceptions about how well GTR handled the disruption

Overall, how well did the train company deal with disruption(s), you have experienced since 20 May 2018

Well	Neither	Poor
24%	14%	62%

Question A26. Base size: All those who experienced disruption with GTR (117)
Well includes the responses very well and fairly well. Poor includes the responses very poor and fairly poor

2.16. To provide some additional context to these findings we also examined some of the qualitative feedback we received from GTR passengers to give us a more detailed understanding of how these information failures had impacted them. Below is a small sample of the common issues reported:

"You could check before you travel yet after a 10 minute walk to the station the train would be either surprisingly cancelled within that time, or even worse a train which read as being cancelled would pull out in front of your very eyes as you approached the station. What used to be a service every 10-20 minutes turned into a service of something, maybe, possibly at times once an hour if that. There was no reliable communication at all."
– **GTR Thameslink passenger**

"Trains tended to disappear without notice from the board. In one instance, when advised that a 'semi-fast' train was fastest way to get into London, extra stops were added without warning when I was on the train, meaning a later, fast train actually got to London quicker by 10-15mins in terms of arrival time which was very frustrating. So the information provided to me was completely wrong." – **GTR Thameslink passenger**

"You can't plan ahead and we're having to get up at 5am every morning to check what time trains we can get to work."
- GTR Great Northern passenger

"[Information] is totally inaccurate, trains cancelled 5 mins before they were due, services added but not included in the tracking apps or stations boards. Services turning up and no one knowing where they would stop. Services diverted to alternative destinations part way though a journey."
- GTR Great Northern passenger

"I would get to the station for a particular train that I believed was running and it would be cancelled. On one occasion the train I went for was showing running on the website, but when I got to the station it was showing cancelled so I went to a different platform for the next train and then unbelievably the so-called cancelled train arrived, but there was not enough time to get across to that platform to catch it, down 3 flights of stairs and up 3 on the other side."
– **GTR Thameslink passenger**

"Not enough communication on a daily basis about which trains are running and which are cancelled e.g. many cancellations don't show early enough on the app. Some trains change where they're stopping once you're on."
– **GTR Thameslink passenger**

"Station staff have no information either. How can they advise passengers when they don't know themselves."
- **GTR Great Northern passenger**

"Because as the station staff kept telling us, they knew no more than we did. The screens showed the 0640 as Delayed until 20 mins after it should have gone, and then it went to that stupid message about watch screens for any further info or something like that, it is the GN standard no info message. As it turns out, GN twitter was probably right, and what I caught in the end was the 0707. But there was no way to know or tell….How are we supposed to keep rearranging our working hours to cope with this?"
– **GTR Great Northern passenger**

It's a question of turning up at the station and seeing what is running that day. I use an app to track departures but this is virtually useless to use to plan to. On platform GTR staff at London Bridge are not proactive in communicating with customers. They are clearly under pressure but are not helpful at all.
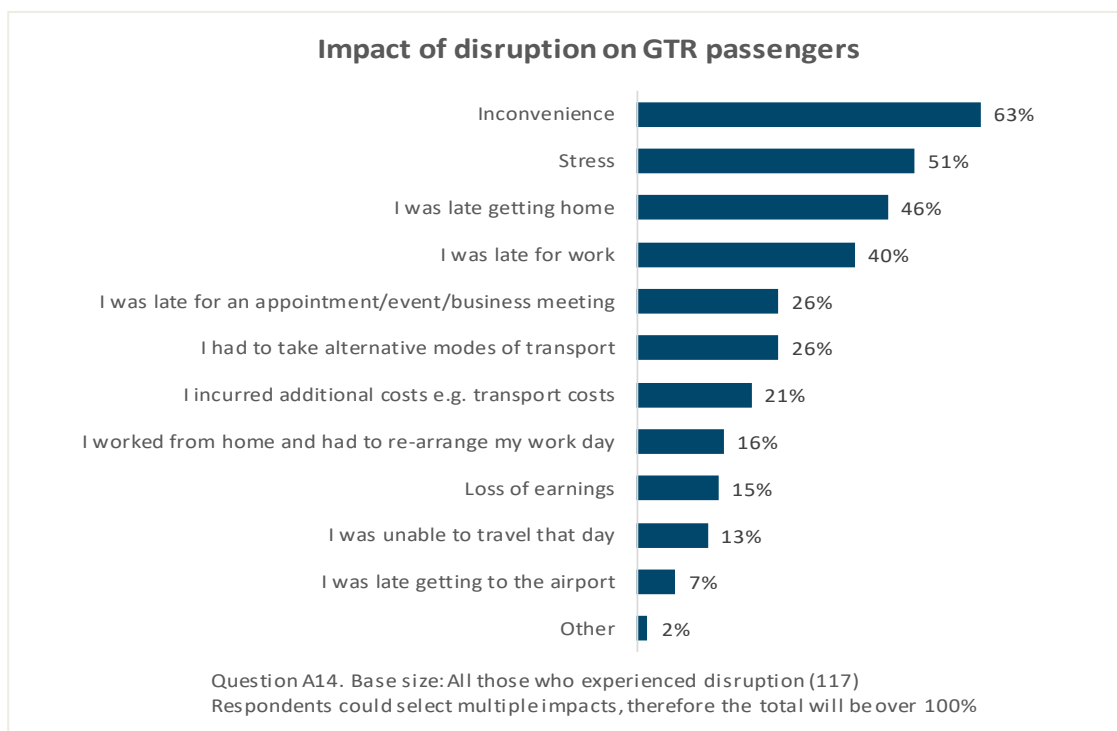- **GTR Thameslink passenger**

"Trains exist and are on time according to apps but are frequently cancelled, changed or simply disappear without any explanation. The station staff are trying their best on the day but there is no control and no ability to plan. Even once on a train you have no idea of your destination or time of arrival as there can be additional or removed stops, early termination of journey, general delays. All whilst in horribly, barely humane overcrowded carriages."
- **GTR Great Northern passenger**

2.17. These sentiments noted in passenger feedback above were also reflected in GTR social media engagement. We have seen evidence from internal GTR documents that their social media team was reporting to senior management about the volume of contacts from passengers dissatisfied with the quality of journey information provided to them from 20 May until early July.

Understanding the impact of the disruption on passengers

2.18. The Inquiry identified a number of impacts on passengers caused by the disruption. Figure 2.9 shows the findings of the independent quantitative and qualitative research, and responses from passengers to ORR's own survey and to the Inquiry itself.

Figure 2.9 – Impact of disruption on GTR passengers

Impact of disruption on GTR passengers

Impact	Percentage
Inconvenience	63%
Stress	51%
I was late getting home	46%
I was late for work	40%
I was late for an appointment/event/business meeting	26%
I had to take alternative modes of transport	26%
I incurred additional costs e.g. transport costs	21%
I worked from home and had to re-arrange my work day	16%
Loss of earnings	15%
I was unable to travel that day	13%
I was late getting to the airport	7%
Other	2%

Question A14. Base size: All those who experienced disruption (117)
Respondents could select multiple impacts, therefore the total will be over 100%

2.19.   We have not sought to assess the extent to which the following types of impact can be directly attributed to failures in the provision of passenger information but it is clear that better information may have alleviated the overall detriment that passengers experienced.

■   Financial

2.20.   The costs to passengers resulting from the timetable disruption have a range of financial impacts on passengers. These might be short-term such as increased childcare costs due to late arrival home or paying for a taxi when the train is cancelled or delayed, buying refreshments at the station whilst waiting for a delayed train, buying dinner because of getting home too late to cook, and paying for public transport to travel to alternative stations. Some financial impacts may be longer-term such as taking a new route to work resulting in an increased travel ticket cost, routinely choosing to take a taxi when travelling home late at night to avoid being 'stuck' at a station late at night, and a loss of earnings.

■   Stress and inconvenience

2.21.   Being unable to rely on a consistent train service such as late notice cancellations or delays or station skipping can increase the stress experienced by passengers and heighten levels of anxiety as passengers are unable to meet work commitments or family events. There were also many references to parents who were put under extreme stress to make unexpected adjustments to childcare with minimal notice due to the daily uncertainty of their journey times. This can have a detrimental impact on health as increased stress levels manifest themselves.

2.22. We also noted many complaints from passengers regarding overcrowding or being unable to board trains after long gaps between services.

■ Employment

2.23. The detrimental impact on passengers' working lives was often in the form of arriving late to work or meetings. Aside from the possible reputational damage to the individual or the employer, including the loss of business, this might be a time cost meaning that the person will be required to stay later at work to complete tasks or to do so because they felt they had to having arrived late.

■ Social

2.24. Getting up earlier and getting home later was a consistent issue for passengers, particularly commuters who build their family and social lives around the time of their daily travel. Journeys were being planned on the basis that services will be cancelled or delayed which meant getting earlier trains in the morning and later ones in the evening. Some rail users did not feel comfortable travelling and chose not to do so at all. Such a situation may be exacerbated for those passengers who rely on assistance either booked with the rail company or via friends/family.

2.25. Moreover, the impact of the disruption was in addition to the fact that passengers had already had to make adjustments to account for the changes being made for the planned 20 May timetable. Having made those plans as forewarned by GTR the impact of the disruption was an additional layer of inconvenience due to the unreliability of the service.

■ Personal safety

2.26. Passengers were concerned that the unreliability of services – cancellations or delays – particularly late at night leaves them vulnerable and their safety is at increased risk. For example, Thameslink services are scheduled to run through the night but the overnight frequency was cut back during the disruption. There was also a potential impact on passengers with reduced mobility who may have been physically unable to respond to last minute platform announcements or changes.

2.27. ORR's Chief Inspector of Railways wrote to GTR on 5 July to raise concerns about last minute platform changes and passenger safety.

■ Trust in the railway (and changing travel behaviour)

2.28. Passengers' experiences during the disruption caused by the rail timetable changes had a negative impact on their feeling of trust, and relationship with the rail company. The lack of consistency with cancelled trains being changed every day at short notice contributed significantly to that. In addition, use of the delay reason "operating incident" which could then not be explained by the Twitter team added to a feeling of a lack of

control. Likewise, the lack of a clear explanation on why the timetable changes were happening or the scale of the changes, and the lack of improvement in services as a result of the timetable changes had exacerbated the impact. This lack of trust, combined with a change in travel behaviour, may have a financial impact on the rail company.

Impact of the disruption on disabled passengers

2.29. We undertook analysis of the number of Passenger Assist bookings and the volume of accessibility-related complaints GTR received.
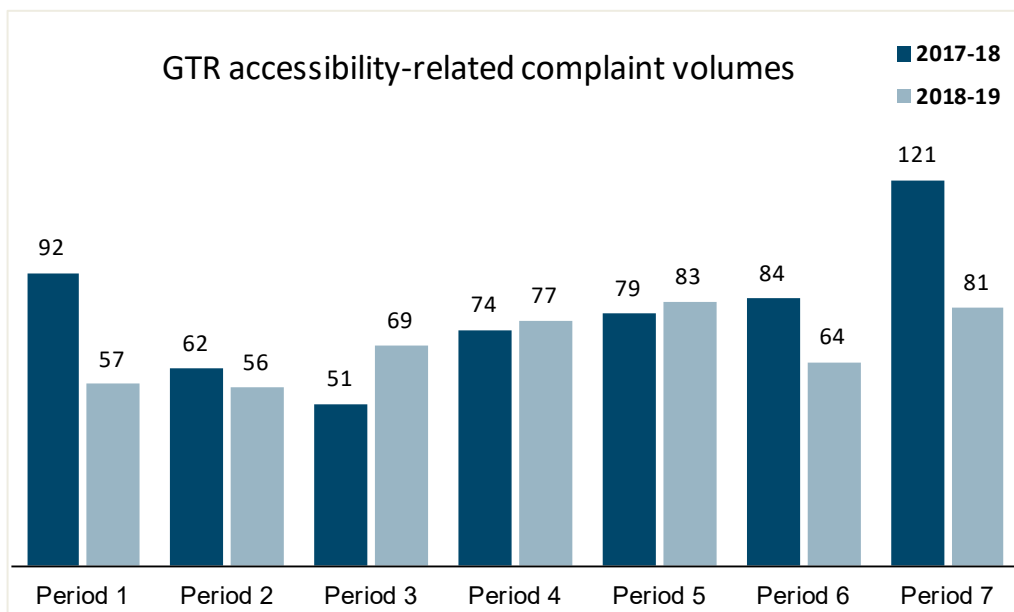
2.30. Figure 2.10 indicates that despite the worst of the disruption having occurred throughout Rail Periods 2, 3 and 4, Passenger Assist booking volumes increased slightly relative to the same timeframe the previous year. This indicates that, for the most part, the disruption did not dramatically undermine the willingness of those passengers who rely on assistance to book it. Nevertheless, it is possible that some disabled passengers may have chosen not to travel due to concerns about the reliability of services and its potential impact upon assistance provision.

Figure 2.10 – Comparison of GTR Passenger Assist booking volumes 2017-18 versus 2018-19 for Rail Periods 1-7
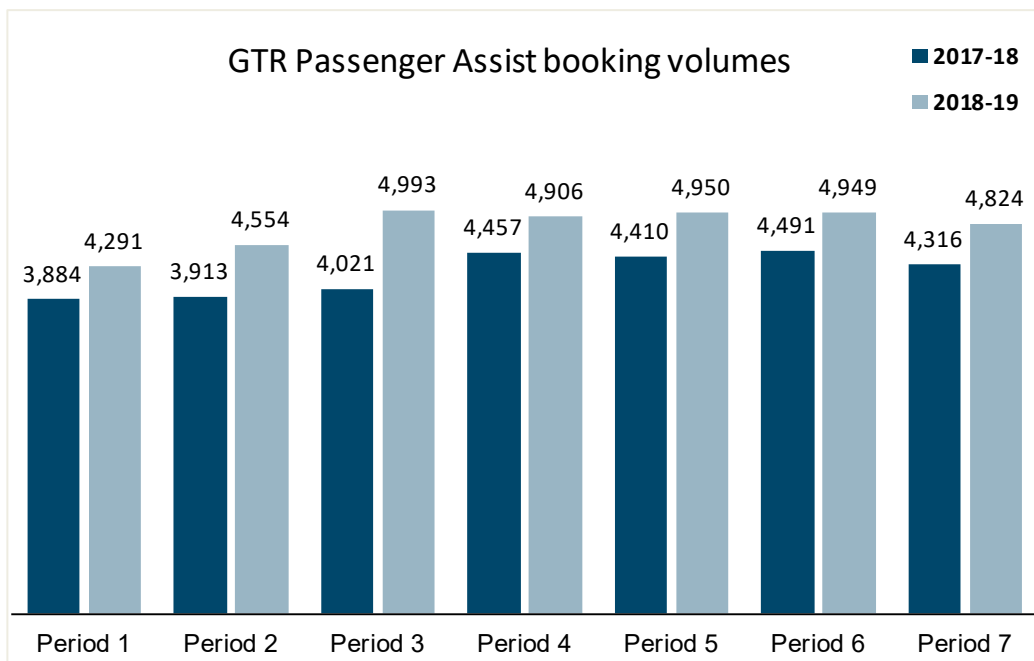
2.31. Figure 2.11 indicates there was a slight uplift in the volume of accessibility-related complaints GTR received in Rail Period 3 relative to the same timeframe in the previous year. Otherwise, throughout the disruption, complaints about accessibility issues remained largely in line with booking volumes which suggests that some of the mitigations GTR had put in place to protect these passengers were effective.

Figure 2.11 – Comparison of GTR accessibility-related complaint volumes 2017-18 versus 2018-19 for Rail Periods 1-7

GTR accessibility-related complaint volumes

	2017-18	2018-19
Period 1	92	57
Period 2	62	56
Period 3	51	69
Period 4	74	77
Period 5	79	83
Period 6	84	64
Period 7	121	81

2.32.   Nevertheless, under the circumstances passengers with disabilities were likely to have been severely impacted by the poor or changing information during the May 2018 timetable disruption. For example, changes to departing platform numbers at short notice may not have allowed some passengers with mobility issues enough time to safely board the train. This would also be the case for the 'ghost trains' (see Chapter 4) that arrived at stations unannounced.

2.33.   We have found a number of examples of station staff being unaware of the plan for services until after the event; in this situation the negative impact of the lack of information is magnified for disabled passengers who often rely on station staff for information and assistance to make their journey. Station staff not having the necessary information would cause difficulties for disabled passengers regardless of whether assistance was booked or not.
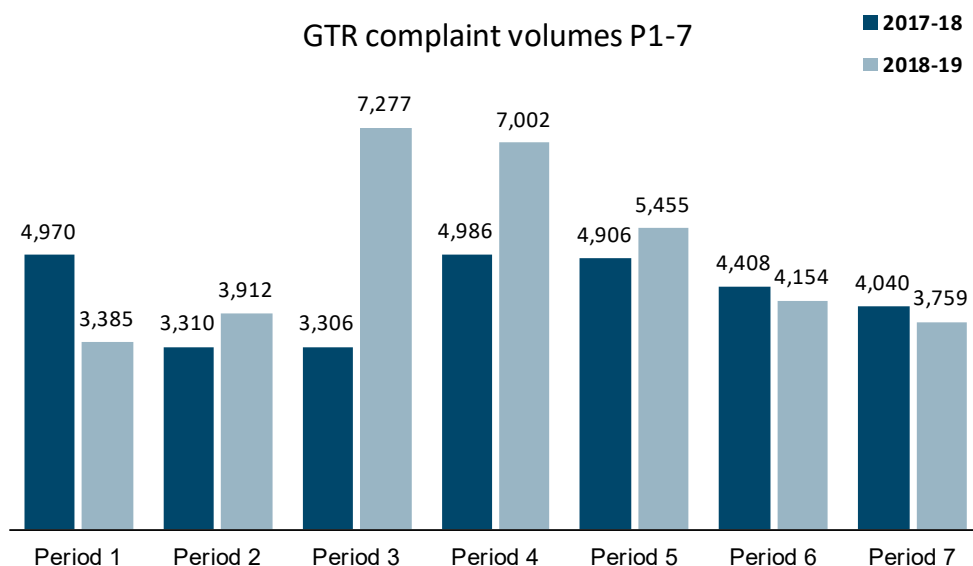
2.34. Recognising these issues, GTR put in place additional measures to assist disabled passengers to plan and make their journeys (discussed further in Chapter 4). While GTR also encouraged passengers to book assistance it remains the case that travel on a turn-up-and-go basis, particularly for passengers with reduced mobility, would have been extremely challenging for the entire period of the disruption.

Complaints and delay compensation

2.35. We also undertook analysis of the number of complaints and Delay Repay claims received by GTR before and after the 20 May timetable change (late in Rail Period 2[22]) to further understand the impact upon passengers. As illustrated in Figure 2.12 and 2.13, there was a significant uplift in both complaint volumes and Delay Repay claims for both Rail Period 3 (27 May to 23 June) and 4 (24 June to 21 July) which correspond with the worst periods of disruption. The difference in complaint volumes relative to the same time period the previous year is also noteworthy. This is because it provides evidence that these increases were not attributable to latent seasonal trends and were instead most likely a consequence of the negative impact of the timetable change on passenger outcomes.
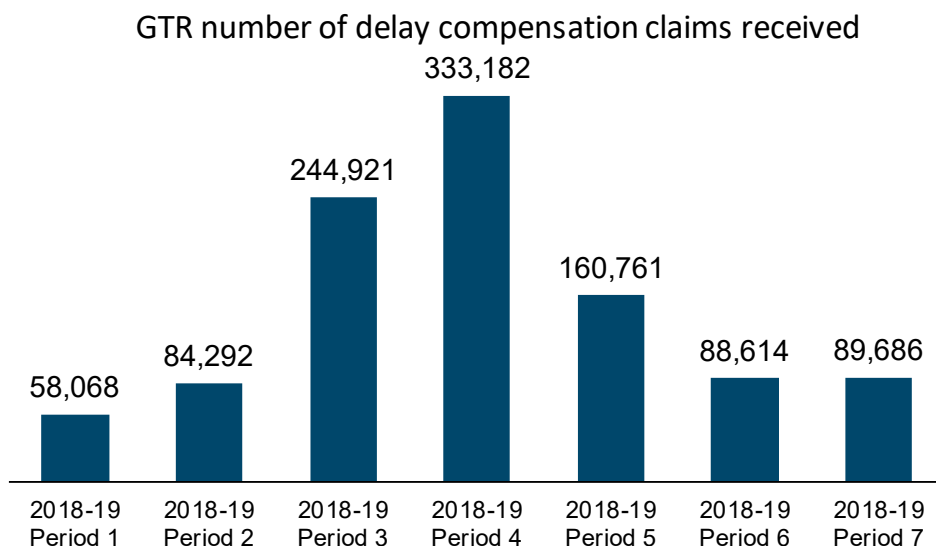
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[22] Rail Period 2 started on 29 April 2018 and ended on 26 May 2018

Figure 2.12 – Comparison of GTR complaint volumes 2017-18 versus 2018-19 for Rail Periods 1-7

GTR complaint volumes P1-7

Legend: 2017-18, 2018-19

Period	2017-18	2018-19
Period 1	4,970	3,385
Period 2	3,310	3,912
Period 3	3,306	7,277
Period 4	4,986	7,002
Period 5	4,906	5,455
Period 6	4,408	4,154
Period 7	4,040	3,759

2.36. The chart below illustrates the spike in delay compensation claims during the introduction of the new timetable towards the end of Rail Period 2. The volumes then begin to normalise after Rail Period 4 following the introduction of the interim timetable on 15 July.

Figure 2.13 – Delay Repay claims received by GTR P1-P7 in 2018/19

GTR number of delay compensation claims received

Period	Claims
2018-19 Period 1	58,068
2018-19 Period 2	84,292
2018-19 Period 3	244,921
2018-19 Period 4	333,182
2018-19 Period 5	160,761
2018-19 Period 6	88,614
2018-19 Period 7	89,686

2.37. Promotion of the Delay Repay scheme proved effective, despite some uncertainty over whether the automatic Delay Repay facility was working for smartcard holders. The extension of the scheme to allow a claim to be made against the published May timetable rather than the 'timetable of the day' was a welcome addition and also more generous than normal industry practice (see also Chapter 4).

Consideration of passenger impacts

2.38.   The analysis in this chapter has enabled us to develop a deeper and wider understanding of the impact of the disruption on GTR passengers in the period before and after the 20 May timetable change. This has informed our analysis in Chapters 3 and 4 about the appropriateness of GTR's actions in relation to condition 4 of its Passenger Licence and SNRP.

3. Information for passengers pre-20 May - analysis of evidence

Summary

This chapter sets out the events prior to the 20 May 2018 timetable change and the provision of information to passengers by GTR about its services during this period. We set out our analysis of the factors relevant to the investigation for this period alongside our key findings.

Introduction

3.1.   In this chapter we set out our findings in relation to the period leading up to the introduction of the 20 May timetable in respect of condition 4 of the Passenger Train Licence and the Statement of National Regulatory Provision (SNRP). We have analysed a range of information including material received from GTR as part of this investigation and information obtained during the timetable Inquiry. In so doing we have also considered guidance[23] published by ORR, and our expectations for compliance with the licence condition under three broad principles[24] as set out in Chapter 1.

Information for passengers pre-20 May

Timeline of events

3.2.   The timeline of relevant key events associated with the provision of information to passengers has been produced from the sources of evidence given to us as part of our investigation work and from the timetable Inquiry. It is provided as a summary below.

DATE	ACTIONS
Jan 18	GTR dedicated public-facing website for the timetable change, RailPlan2020, and a comprehensive communications campaign that 'every train will change' were developed and launched.

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[23] http://orr.gov.uk/__data/assets/pdf_file/0015/4353/information-for-passengers-guidance-on-meeting-the-licence-condition.pdf
[24] http://orr.gov.uk/__data/assets/pdf_file/0020/27047/licence-condition-4-letter-to-toc-managing-directors-2018-02-23.pdf

DATE	ACTIONS
16/3/18	GTR/DfT progress meeting on the timetable deployment plan. Includes TBC plans for communication activities and route specific messages.
23/3/18	National Rail Enquiries (NRE) bulletin text added; information in journey planners post-20 May not yet complete and subject to change.
6/4/18	GTR submit a recommendation for rolling deployment to DfT involving the cancellation of 80-100 trains a day[25].
9/4/18	GTR ask for all their current trains (running up to 20 May) to be 'yellow triangled' on NRE – service update message added to check trains as all times are changing. (See also Chapter 5). Decision to flag all timetables and A-Z posters with 'major changes during this timetable – check before you travel' message.
10/4/18	DfT confirm that rolling deployment can proceed, noting the need to consider very carefully the communications to passengers and other stakeholders.
25/4/18	Rolling deployment pages set up on RailPlan2020 and bulletin posted to signpost to it from NRE. Live departure board bulletin at affected stations and NRE bulletin on affected services regarding the gradual introduction of trains on some routes. Revised posters sent to stations, and mini paper timetables available at stations and PDFs on the RailPlan2020 website.
27/4/18	NRE asked to flag those trains currently in the timetable but which will not run for first 3 weeks under rolling deployment.
30/4/18	Timetable GTR internal feedback mailbox established for post-20 May.
2/5/18	RailPlan2020 website updated to include rolling deployment PDF timetables.
4/5/18	Full service PDF timetables available for passengers to download from RailPlan2020 website.
9/5/18	Staff 'call to action' for management volunteers post-20 May.

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[25] http://orr.gov.uk/__data/assets/pdf_file/0018/39042/inquiry-into-may-2018-timetable-disruption-september-2018-findings.pdf

DATE	ACTIONS
10/5/18	GTR submit a request to run an amended rolling deployment 'extra' for the duration of the May 2018 timetable.
11/5/18	DfT provides conditional approval for rolling deployment 'extra'.
11-20/5/18	Posters with train services (A-Z's) installed at stations.
16/5/18	Rolling deployment 'extra' text live on 2020 website, CIS and OIS. GTR has no base weekend timetable as Network Rail offer has 450 trains rejected. GTR write to stakeholders to advise of a gradual deployment of a small number of services[26]. GTR press release issued announcing 400 new daily services.[27]
17/5/18	'How we inform' GTR TT Comms internal steering group decided on use of operating incident in systems to describe cancellations.
17/5/18	NRE advised that further trains are affected by rolling deployment and messaging needs to be extended.

Analysis

3.3.   As part of this investigation we requested that GTR provided evidence of their communications pre-20 May 2018 timetable implementation. In conjunction with the information previously received from GTR and other stakeholders as part of the Inquiry, this enabled us to form a good understanding of GTR's communications activities for passengers and staff in the weeks leading up to the timetable change on 20 May 2018.

3.4.   GTR provided evidence of its 'time of every train will change' campaign and the use of its dedicated website, RailPlan2020, in which it held all of the information regarding the timetable change. The evidence provided to us included photographic evidence of posters displayed in situ at various stations and on-board trains, screenshots of digital screen banners displayed on trains and documentation requesting on-board train announcements to be made.

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[26] Transport Focus response to ORR Inquiry, 12 July 2018
[27] http://www.mynewsdesk.com/uk/govia-thameslink-railway/pressreleases/gtr-announces-13-per-cent-increase-in-train-services-in-uks-biggest-ever-timetable-change-2507786

3.5.   The RailPlan2020 website was initiated in January 2018. The website served to inform passengers of the timetable change and provide access to downloadable timetables for passengers to plan their journeys. Prior to 20 May, the RailPlan2020 website had received more than 800,000 hits on the timetable pages.

3.6.   In March 2018, a proposal was taken to the 'GTR TT Comms' internal steering group, established to manage the timetable communications plan, that timetables and A-Z posters should carry a timetable change warning. On 9 April this change was signed off and a warning message '*major changes during this timetable. Check before you travel nationalrail.co.uk*' was added. However, within the timetable booklet itself there was nothing to explain what these changes would be or when they might happen.

3.7.   GTR also submitted evidence of its leaflet drop plan for the weeks leading up to 20 May. This indicated that between 9 April and 19 May, 172,000 leaflets were handed out to passengers across 25 stations including 40,000 at five major stations in the week before the change.

3.8.   GTR supplied information which demonstrated the extent of its engagement with staff. This included regular briefings and trackers to monitor the number, job role and location of staff who had been briefed about the timetable change. Employees were asked to provide feedback about posters and announcements they observed on board and at their arrival and departure stations. GTR also provided an example of a weekly survey output from the last week of April and the first week of May. Staff feedback highlighted examples of good practice, for example 'Good announcements at Luton Parkway & Harpenden'. However, there were also many examples where staff reported that there was a lack of on-board announcements or passenger information messages and a lack of advertisements at stations.

3.9.   In addition to the research highlighted in Chapter 2 of this report, GTR provided evidence of its own monitoring of passenger awareness of the timetable change. Conducted in late April, this found that 80% of passengers were aware of the 20 May change, and this was fairly comparable across both Great Northern and Thameslink passengers. It also indicated that 49% of Great Northern and 61% of Thameslink passengers were aware of what the timetable change would mean for their journey.

3.10.   However, social media messages collected by GTR in the week leading up to the timetable change suggest that some travellers into London were unclear about the effects of new routes on their season tickets going into London. In particular, confusion regarding which stations would be valid for those holding a 'London Terminals' ticket.

3.11.   We did not find any evidence which indicated what advice, if any, passengers who were booking assistance to travel were provided with about the new timetable.

Nonetheless, as noted in Chapter 2, passengers who required assistance to travel continued to book in increasing numbers during the period.

3.12. Analysis of documents including GTR's 'Weekly Washup' summary reports produced by the communications team, which outlined planned and completed activities as well as key issues and risks, enabled us to identify and examine key documents and evidence used to communicate with passengers.

3.13. From 6 May, GTR increased its activity to promote the timetable change. It distributed 25,000 leaflets and confectionary tagged with RailPlan2020 across five stations. Vinyl wraps were fixed to surfaces at East Croydon station inscribed with 'the time of every train will change'. Digital poster boards, a giant-sized, Alice-In-Wonderland-style white rabbit and 3D rabbit-hole floor stickers were also instituted at Victoria and Brighton stations.

3.14. GTR provided evidence of its use of social media. These Twitter messages focussed on highlighting that the timetable would change on 20 May with an encouragement to passengers to check train times.

Great Northern @GNRailUK · 19 May 2018
⏰🚆 Big changes from Sunday 20 May.

New timetables

New journey possibilities with @TLRailUK

Check your trains now 👉 ticket.greatnorthernrail.com

THE TIME OF EVERY TRAIN WILL CHANGE – 20 MAY

1 DAY TO GO!

RAIL PLAN 20/20

Find out more at railplan2020.com

3.15. GTR received DfT approval to proceed with the rolling deployment and rolling deployment '*extra*' proposal - a phased timetable implementation plan. The first rolling deployment was approved on 10 April and RailPlan2020 pages were set up on 25 April; rolling deployment '*extra*' was approved on 11 May. This resulted in some new Thameslink services on specific routes such as Horsham to Peterborough being removed from the timetable for the first few weeks. Relevant text went live on the website on 16 May. The rolling deployment service was also promoted through station posters, Customer Information System (CIS) screens and Operational Information System (OIS) screens at stations, and via social media. The RailPlan2020 website also provided access to downloadable timetables for passengers.
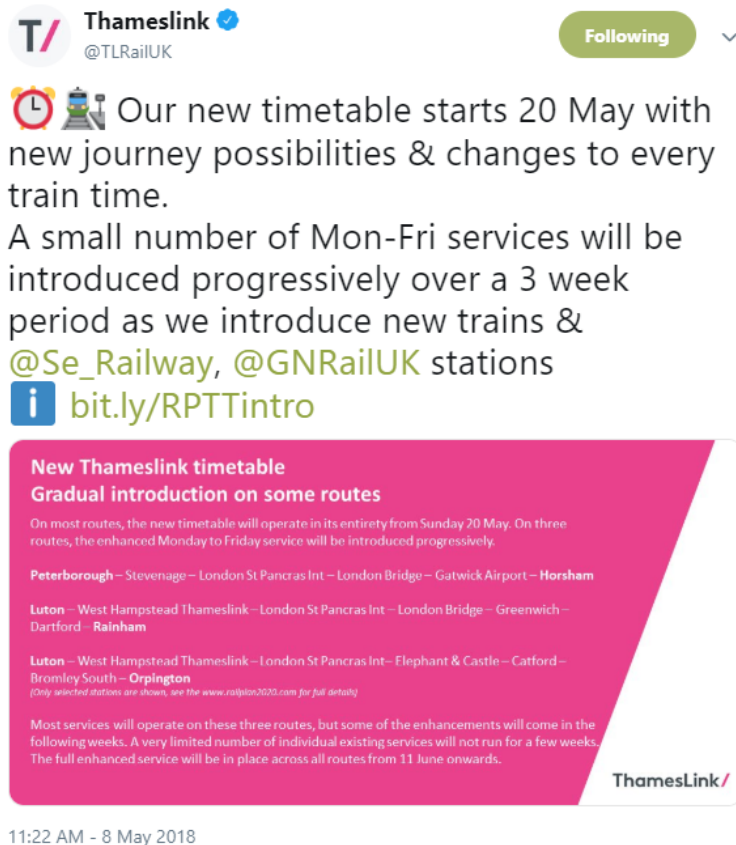
3.16. As part of the evidence submission GTR provided a draft undated April communication to MPs, and a draft 19 April stakeholder question and answer note. The former noted that some new services would be introduced progressively over the following three weeks whilst the latter referred to specific routes.

3.17. From 16 May, GTR updated customer and operational information systems and updated the RailPlan2020 website with PDF timetables to inform passengers of the impending timetable changes. Passengers were further advised to 'recheck' the website as journey planners may not have been up-to-date.

3.18. GTR issued a press release on 16 May to highlight the timetable change and announce an increase of 400 new train services it was providing under the timetable. Alongside the headline, GTR used graphics to remind passengers that the time of every train would change and to check before they travelled.

3.19. GTR wrote to stakeholders on 16 May to inform them that there would be gradual deployment on Great Northern and Thameslink of a small number of services to provide a smooth transition to the new pattern. GTR asked stakeholders to share information about the timetable changes with internal and external contacts.

Findings

3.20. We consider that RailPlan2020 and the 'time of every train will change' campaign was successful in raising awareness amongst passengers of the major change in the timetable, and was markedly different from usual timetable change communications. As noted in Chapter 2, 75% of passengers in our research were aware that the timetable was changing and the RailPlan2020 website attracted more than 800,000 hits.

3.21. As noted in Chapter 2, the personal impact of the timetable change was not well understood by some passengers. Passengers who had familiarised themselves with RailPlan2020 were potentially unaware that some of the services would not be introduced until sometime after 20 May; almost three in five passengers believed that the new timetable would be introduced in full.

3.22. On the last few days leading up to the transition weekend passengers were advised again to recheck the website. Passengers who had heeded the earlier messages and already worked out their plans for the new timetable, were faced with uncertainty as fewer trains were running on some lines.

3.23. Nonetheless, we consider that GTR used the RailPlan2020 website, the 'time of every train will change' campaign and a wide variety of communication channels (e.g. social media, print media, station advertising, stakeholder briefings as well as paper timetables, leaflets and more attention-grabbing marketing) to proactively disseminate the clear message that something significant was going to happen on 20 May. Prospective passengers were made aware of the change, had access to the expected timetable and reasonable efforts were made to keep passengers up to date as late changes were made in the period leading up to the 20 May.

3.24. Based on the balance of information assessed and summarised in this chapter, we consider that GTR took reasonably practicable steps to provide appropriate, accurate and timely information to passengers prior to the timetable change on 20 May.

4. Information for passengers post-20 May – analysis of evidence

Summary

This chapter sets out the events following the introduction of the 20 May timetable and the provision of information to passengers by GTR about its services during the subsequent disruption. We set out our analysis of the factors relevant to the investigation for this period alongside our key findings.

Introduction

4.1.   In this chapter we set out our findings in relation to the period following the introduction of the 20 May timetable in respect of condition 4 of the Passenger Train Licence and the Statement of National Regulatory Provision (SNRP). We have analysed a range of information to inform our findings. This includes material received from GTR as part of this investigation and information obtained during the timetable Inquiry. We have also considered guidance[28] published by ORR, and our expectations for compliance with the licence condition under three broad principles[29] as set out in Chapter 1.

Information for passengers post-20 May

Background

4.2.   Rail disruption can take many forms including a failed train, problems with signalling, track defects, power supply problems and severe adverse weather. Delays are often categorised as minor or major, and the industry has established plans and thresholds for escalation and response that aim to provide appropriate, accurate and timely information and advice so that passengers can make informed choices about their journey. Such plans are aimed at operational delays that can occur on a daily basis. Where more severe disruption occurs for example the extreme weather experienced in February 2018 as a result of the 'Beast from the East', rail services can be disrupted for several days and the aim of the train operators and Network Rail is to recover operations to normal as soon as possible.

4.3.   The disruption that occurred because of the timetable change in May 2018 was both severe and prolonged. Our primary focus has been on the period of 8 weeks between 20 May and the introduction of an interim timetable on 15 July. This was because the

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[28] http://orr.gov.uk/__data/assets/pdf_file/0015/4353/information-for-passengers-guidance-on-meeting-the-licence-condition.pdf
[29] http://orr.gov.uk/__data/assets/pdf_file/0020/27047/licence-condition-4-letter-to-toc-managing-directors-2018-02-23.pdf

reliability of services generally improved following the introduction of the interim timetable on the 15 July (shown in Chapter 2) and we saw evidence that GTR had sought to proactively communicate its introduction to passengers in advance of its implementation.

4.4. During interviews with GTR in July and October 2018, senior company representatives described the unprecedented challenges they faced and characterised GTR's response to the disruption in the period post-20 May to 15 July as one of ongoing trial and error to try to provide consistent information to customers.

4.5. When disruption is likely to be prolonged it is possible to create contingent or emergency timetables which can be operated robustly and reliably for the duration of the disruptive event and within the available resources of the train operator in terms of train sets and available crew. We understand that this option was considered in the immediate period after the disruption began. In correspondence to ORR on 16 October, GTR outlined the following reasons for not introducing a revised timetable before 15 July:

> *"The decision was taken not to introduce an emergency timetable in the weeks that followed the May 2018 timetable introduction. A temporary timetable may have provided passengers with "guaranteed" services with information to match. However, any short-term timetable change would have resulted in a severely reduced service with huge negative consequences for our passengers. As a commuter TOC, that already had challenges with providing sufficient capacity for passengers, we did not believe that this was in their best interests. This decision did mean that in the aftermath of the May 2018 timetable introduction there were occasions where services arrived at stations which did not appear in the rail information systems."*

4.6. The remit of this investigation is to consider the provision of passenger information during the disruption that occurred in the period following 20 May irrespective of the reasons for that disruption or the decision not to implement an emergency timetable. Condition 4 of the Passenger Train Licence and the Statement of National Regulatory Provision (SNRP) is not intended to undermine the primary objective of providing the best available service for passengers. For that reason we have not sought to question GTR's decision in this area. The remainder of this chapter discusses the provision of information to passengers in the period of service recovery; between 20 May and the introduction of an interim timetable on 15 July.

Timeline of events

4.7. The timeline of relevant key events associated with the provision of information to passengers has been produced from the sources of evidence given to us as part of our investigation work and from the timetable Inquiry. It is provided as a summary below.

DATE	ACTIONS
20/5/18	The May 2018 timetable was introduced.

Some services previously operated by Southern or Great Northern were joined together to form cross-London Thameslink services, e.g. Horsham to Peterborough |
22/5/18	In response to passenger feedback about the confusion it was causing, GTR decided to remove 'operating incident' as the default reason for timetable related cancellations. Instead, it was decided no reason would be displayed. However, there was evidence of some instances where 'operating incident' continued to be used after this date.
25/5/18	The decision was made to remove cancelled trains from systems. This was to show passengers only what was running on Customer Information Systems (CIS) screens and journey planners.
28/5/18	GTR established a Service Recovery Crisis Management Team to formulate a service recovery plan.
29/5/18	219 buses were secured for the Great Northern route to address timetable gaps. At this stage bus times and locations were not made available to passengers via journey planners.
30/5/18	The decision made on 25 May to remove cancelled trains from systems caused problems in how services were shown on Customer Information System (CIS) screens and journey planners, which required further manual interventions by GTR's information team in the Three Bridges Control Centre (Control).

Additionally, at this point automatic Delay Repay was not working for its smartcard ticket holders. GTR emailed customers to inform them of this issue and to advise them to claim manually. |
| 31/5/18 | Following feedback from customers and ORR highlighting Delay Repay confusion over which timetable to claim against, GTR clarified that Delay Repay would be paid on either the timetable running on the day or the original May 2018 timetable. This was made clear in website messages on the Delay Repay page. |
| 4/6/18 | GTR identified a consistent list of diagrams for removal from the timetable. GTR stated these removals had the aim of improving the consistency of the timetable[30]. Further services were removed or cancelled on a day-by-day basis.

Passengers were not provided with a list of the services that would be removed for the week ahead.

GTR provided posters at stations with the following message: "*Please regularly check before you travel. Interim timetables are in place while we phase in a new long-term timetable*".

GTR tickets were accepted on a range of other train operators and buses. Ticket acceptance updates were sent to stations and updated on websites. |

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[30] https://www.bbc.co.uk/news/uk-england-44347990

DATE	ACTIONS
8/6/18	Gatwick Express restrictions were lifted for GTR tickets giving passengers from Brighton an extra 2 trains an hour they could use if they were using "Thameslink only" or "Not Gatwick Express" routed tickets. Holders of more expensive season tickets could trade them in for cheaper "Thameslink only" routed tickets.
10/6/18	Bus allocation plans were issued to Control and station staff to allow them to plan staffing rosters and inform passengers. The plans were not available in journey planners at this point.
11/6/18	Messaging was added on the National Rail Enquiries website: "*Online journey planners will be updated by 20:00 on the Sunday of each week to show the short term amended timetable operating on the following Monday to Friday*". Additionally, passengers were warned that it was still "*vital that you recheck your train as close to the time of your journey as possible using journey planner or live departures.*"
11/6/18	Further guidance on Special Stop Orders was issued to Control relating to a number of trains being added back into the service but arriving unannounced at stations.
12/6/18	Some bus plans were now shown in journey planners where a bus was running to a fixed timetable. Other buses remained on standby for flexible use.
25/6/18	GTR wrote to stakeholders notifying them that from Monday 25 June passengers would be able to plan their weekday journeys in advance for the coming three weeks[31]. A PDF timetable was published on GTR's websites.
28/6/18	To ease overcrowding DfT approved the declassification of first class across all GTR routes until 15 July 2018.
3/7/18	PDFs for the 15 July interim timetable were added to GTR's websites.
6/7/18	Additional pages were added to GTR's websites to introduce the interim timetable to passengers.
15/7/18	An interim timetable was introduced, based on the original May 2018 timetable but with fewer services, primarily in the off peak period[32]. The weekend service continued to be simplified and will remain at the lower levels until the May 2019 timetable change[33].
30/7/18	The normal industry arrangements for Delay Repay were re-implemented.

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[31] https://www.alistair-burt.co.uk/sites/www.alistair-burt.co.uk/files/2018-06/Letter%20from%20Nick%20Brown.pdf
[32] https://www.alistair-burt.co.uk/sites/www.alistair-burt.co.uk/files/2018-06/Letter%20from%20Nick%20Brown.pdf
[33] https://www.thameslinkrailway.com/travel-information/plan-your-journey/timetables

GTR's Service Recovery Plan

4.8. Prior to the 20 May timetable change, GTR arranged for the establishment of a 'gold command structure' (the standard industry control structure for response to major incidents) to manage any disruption. GTR told us that it was not until the end of the first week of the timetable change that it began to realise that the disruption they were experiencing was likely to be prolonged and would require an exceptional response. On 28 May, GTR therefore established a Service Recovery Crisis Management Team to formulate a recovery plan which involved three phases:

- **Phase 1** of the plan, entitled 'Coping', related to week one and two of the new timetable, where GTR was reacting to the erratic train service and uncovered rosters;

- **Phase 2** of the plan, 'Achieve Stability', commenced on 4 June and lasted until 15 July. This was aimed at learning lessons from Phase 1 and removing a consistent set of diagrams from the timetable. During this phase GTR also planned for the implementation of the interim timetable on 15 July;

- **Phase 3** of the plan, 'Deliver Consistent service', began from the introduction of the interim timetable on 15 July (week eight) onwards, where there was a planned reduction in the train service compared to the 20 May timetable, 'to support the delivery of a reliable and consistent service across TL [Thameslink] & GN [Great Northern].

4.9. To support the increase in customer contacts during the disruption following the timetable change, GTR told us that 27 additional staff members were recruited across the contact centre, Delay Repay, head office and social media teams. Additional resources were also brought in to assist Control.

4.10. We reviewed internal GTR documents to assess the extent to which GTR's operational decision-making and passenger information plans and activities were aligned, compatible and mutually supportive. Our review of an array of documentation revealed a wide range of passenger information and communication activities throughout Phase 1 and 2 of the service recovery plan. However, it was clear from a number of other internal documents coupled with other evidence available to us regarding the passenger experience, that these actions were not delivering adequate passenger information outcomes. For example, throughout Phases 1 and 2 of the Service Recovery Plan it was clear that feedback from a number of the internal channels GTR had put in place demonstrated that passenger information failures were significant and occurring on a persistent basis. This message was widely recognised in:

- Staff station thread emails;
- Staff timetable inbox emails;
- Passenger feedback via social media channels; and

■ Senior management and Board reports.

4.11. For example, station thread and timetable emails from the period 20 May to 15 July revealed that information failures continued to occur at a number of stations across the network. Some examples of the types of information-related issues that GTR staff were recognising over a sustained period of time are provided below. The examples are not exhaustive and are provided for illustrative purposes, with feedback on certain dates relating to multiple occurrences:

■ trains arriving or making unplanned stops at stations without station staff knowing ahead of time (11 June, 12 June, 19 June, 10 July);

■ trains not making planned stops at stations without station staff knowing ahead of time (1 June, 15 June, 19 June, 20 June, 22 June, 27 June, 3 July, 9 July);

■ trains cancelled with little notice or after departure time when passengers had boarded (31 May, 6 June, 18 June, 22 June, 26 June, 27 June);

■ trains listed as cancelled or not advertised but ended up running without station staff knowing ahead of time (30 May, 6 June, 7 June, 22 June, 29 June); and

■ staff being unable to get through to the Rail Operating Centre / Control for information when needed (22 May, 31 May, 27 June, 3 July, 14 July).

4.12. The ongoing nature of the information failures throughout Phase 1 and 2 of the Recovery Plan was also apparent from a passenger perspective in GTR's social media engagement. GTR's daily internal social media reports for senior management repeatedly highlighted passenger dissatisfaction with the quality of journey information. We analysed 42 of these reports which covered the period 15 May to 18 July. They show that throughout Phases 1 and 2 of the Recovery Plan that passenger information failures was a persistent theme being reported back to GTR management. Some examples of these are cited below:

■ 23 May: "*Feedback about Railplan2020 was again the dominant trend with delays, cancellations and poor information being the main complaints.*"

■ 24 May: "*Another very busy morning with disruption related to Railplan2020 being the main theme. The overcrowding, cancellations and perceived poor information seem to be passengers main complaint today*".

■ 1 June: "*Another very busy morning with the same trend occurring throughout the week, this being trains 'disappearing' from the timetable. The advice is to check services before you travel which customers are doing only to find their train has been cancelled when they turn up at the station.*"

■ 5 June: "*Disruption continued again today with further anger from passengers. Again our Twitter feed was approaching record levels of busyness with passengers desperate for information and advice.*"

- 12 June: *"Busy as with the other 2 major brands, with issues early in the morning surrounding additional services calling and the information not updating fast enough to reflect this at the platforms, leaving customers confused."*

- 26 June: *"Passengers are still getting fed up of the last minute cancellations and lack of information."*

- 6 July: *"Very busy and very negative. Delays and disruption, changing information and in some cases no information being delivered out on the network until it is too late for passengers."*

- 11 July: *"If anything sums up the service we are currently offering it was the 16.35 service from King's Cross. An incredibly busy service which was showing as running on time. 25 mins after the departure time the service was eventually cancelled. Customers left in the dark. No information! No explanation!"*

- 12 July: *"Passengers showing continued frustration with poor information, late notice changes and packed services."*

4.13. GTR held a 'Black Hat' session on 12 June, led by the Chief Operating Officer, to review the plans and readiness to implement the interim timetable on 15 July. For the purposes of this session a paper was produced by the customer experience team which highlighted the existing priority issues for passengers. These were:

- 'Lack of reliable information;

- Unable to plan;

- Large service gaps;

- Are additional stop orders always effective?; and

- Change to stopping pattern during train service'.

4.14. GTR clearly recognised at the time the paper was submitted, over three weeks after 20 May timetable change and one week after Phase 2 of its recovery plan, that passengers were experiencing ongoing journey information failures. The customer experience team paper noted that frontline teams and customers were receiving inconsistent information which differed across sources, plus incredibly short notice changes.

4.15. We also had access to five GTR Weekly Board reports from the period 20 June to 17 July. Our analysis of these also revealed that passenger information failures were being reported to the Board as ongoing issues.

- Board reports on 20 June, 26 June and 3 July all cited the top two priority customer issues as: *"1) Reliability of information: Frontline teams and customers have inconsistent information – differs across sources, & further impacted by short*

notice changes. 2) Unable to plan: customers advised to check 'as close to travel as possible."

- The Board report on 10 July stated the top priority customer issue as: "*1) Improved control, decisioning and two-way info flows between stations and control. Accuracy of information to customers and station teams continues to be poor*."

4.16.   We noted that passenger information issues were not reported in the GTR Board report (17 July) following the introduction of the interim timetable on 15 July.

4.17.   In summary, we found evidence from a range of sources which revealed that while the continued efforts being made to improve and stabilise services at an operational level throughout Phases 1 and 2 were having some success, the full benefit of this improvement was not felt in passenger outcomes due to the fact that it was often not supported by accurate, timely or appropriate passenger information.

4.18.   We consider that too often there was a failure in operational decision-making to give adequate regard to the fact that running a train service (or rail replacement bus) is only helpful to passengers if they know when and where the service will arrive, where it is going and how long the journey will take. Moreover, the persistence of these information failures over such a sustained period of time, coupled with the lack of evidence as to the company developing any timely or proportionate response to these issues, lead us to conclude there had been a fundamental problem at both a strategic and functional level in aligning operational recovery with passenger information obligations.

Alpha and Beta lists

4.19.   As part of Phase 2 of the Service Recovery Plan, GTR identified specific services which it was unable to run and which could be removed from the timetable. This list of services was known as the 'Alpha list' and evidence suggests this was central to GTR's overall service recovery efforts. GTR explained to us that it knew that the majority of the services on the Alpha list would not be able to run for a prolonged period of time, or indeed had not run at all since the timetable change. The Alpha list consisted of both uncovered driver diagrams that had been identified by GTR and other services they were unable to run informed by the first two weeks of disruption.

4.20.   Internal GTR documents make reference to the fact that the Alpha list of removed services was fixed until the introduction of the interim timetable on 15 July. In terms of the numbers of trains this involved, a recovery planning document, updated on 30 May, specified that 58 driver diagrams were to be consistently removed from systems from 4 June and that the number of train services to be removed from the weekday schedule would increase to 326 trains from 11 June.

4.21.   On 7 June, GTR met ORR to provide a briefing on the current arrangements following a number of concerns that we had raised. GTR indicated that it was not planning to

publish the Alpha list but was expecting to publish a post-Alpha timetable. On 19 June ORR e-mailed GTR to ask when this timetable was likely to be available: "*Although passengers are probably used to those A [Alpha] trains not running by now we think that there is still value in making it clear which trains were expected to be introduced but will not run until further notice, especially as they have been effectively removed from the public timetable.*" GTR published revised PDF timetables with the Alpha trains removed, although this did not happen until 25 June (see below).

4.22. By 11 June, the timetables for weekday services were uploaded to journey planners on the Sunday evening. However, the times for more than a week ahead still showed the full Monday to Friday timetable as expected to be introduced in May. In its 13 June letter to GTR (which formed part of its submission to the Inquiry[34]), Transport Focus urged GTR to bid timetables more than a week ahead:

> "*That you 'bid' your interim timetable to Network Rail considerably further ahead than one week. A journey plan today will show that next Monday you will be operating the full, intended 20 May timetable, when clearly you will not. We suggest bidding the interim timetable on a rolling six-weeks-ahead basis, given the industry's current Informed Traveller target. There is nothing to stop you adding extra trains if you are confident that they can be delivered, but it is not fair on passengers to advertise the full service when you know it cannot be delivered.*"

4.23. Passengers were not informed of the trains that GTR had planned would not run on a consistent basis until 25 June, when GTR uploaded PDF timetables incorporating these changes (which provided a three-week ahead view on planned services up to 15 July). While this was useful, it required passengers to spot the difference to see which trains were no longer there. There was no high level summary of changes for example by route.

4.24. On 25 June, GTR also began communicating this development to key stakeholders as a positive step in providing passengers with more certainty and confidence in knowing which services they could rely on[35].

4.25. A further element of GTR's Service Recovery Plan was that additional services were removed or cancelled on a day by day basis. This list of services was known as the 'Beta list'. This list depended on criteria such as balancing empty stock moves,

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[34] http://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2018/07/20155005/Submission-to-Glaister-Inquiry-passenger-impact-July-2018.pdf

[35] E.g. this can be seen in the content of written responses GTR were issuing to stakeholders and MPs:
(1) https://www.alistair-burt.co.uk/sites/www.alistair-burt.co.uk/files/2018-06/Letter%20from%20Nick%20Brown.pdf
(2) https://www.oliverheald.com/sites/www.oliverheald.com/files/2018-06/Letter%20from%20Nick%20Brown%20to%20MPs_0.pdf

enabling driver relief, carriage of drivers to meet forward workings and maintenance cycles of rolling stock.

4.26.   The Beta list trains were removed individually by GTR staff in its Three Bridges Control Centre ('Control') overnight. This approach meant that the final list of confirmed trains for that day's services was not available to passengers until 04:00. As a result, passengers who intended to travel on those services for work the next morning could check the evening before they intended to travel and the journey planners would show their service running as normal. If GTR subsequently deleted the train during the night it could mean that if the same passenger checked their journey planner by 6am the next morning then it would have disappeared from the timetable.
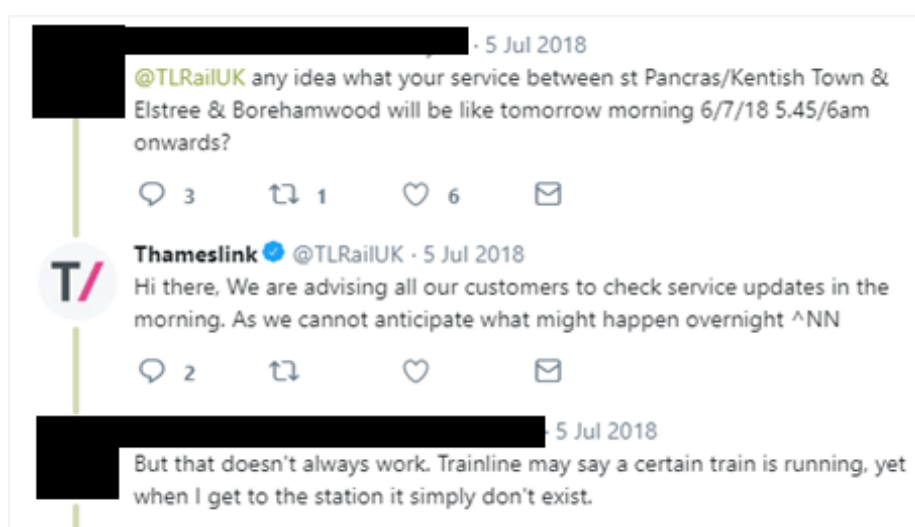

4.27.   Additionally, because passengers were not provided with clear details of the Alpha list (the services that were consistently planned not to run), passengers were not able to identify which trains were never planned to run that week and ones that were removed on a daily basis. This is evidenced by consistent feedback from passengers in our research (Chapter 2) about their frustration at having very little notice or certainty about which services would be running or cancelled for a prolonged period.

4.28.   GTR provided the investigation with daily operational plans between 6 June and 13 July. These plans comprised of both Alpha and Beta lists. We analysed the 'Driver

Diagram Alterations' section of these plans and found that 62% of the train headcodes, each denoting a particular train service, that appeared on at least one Alpha plan we analysed, were listed as cancelled for all of the 28 weekdays that GTR provided plans for. 62% of headcodes equates to 152 services, though we know that GTR planned to remove considerably more services on a consistent basis; 326 trains were 'permanently removed' from 11 June according to a service recovery plan document. What we have found from the limited number of trains analysed is that there was a high degree of consistency in service cancellations every day from 6 June until the interim timetable was introduced on 15 July. In its 7 June document titled "short term timetable – train alterations process" GTR sets out the assumptions used at Control, including that the Alpha list is fixed until 15 July and will be uploaded into TRUST[36] and Darwin[37] by Network Rail.

Figure. 4.1 – Alpha/Beta list daily cancellations

Headcode cancellation by number of days cancelled (%)
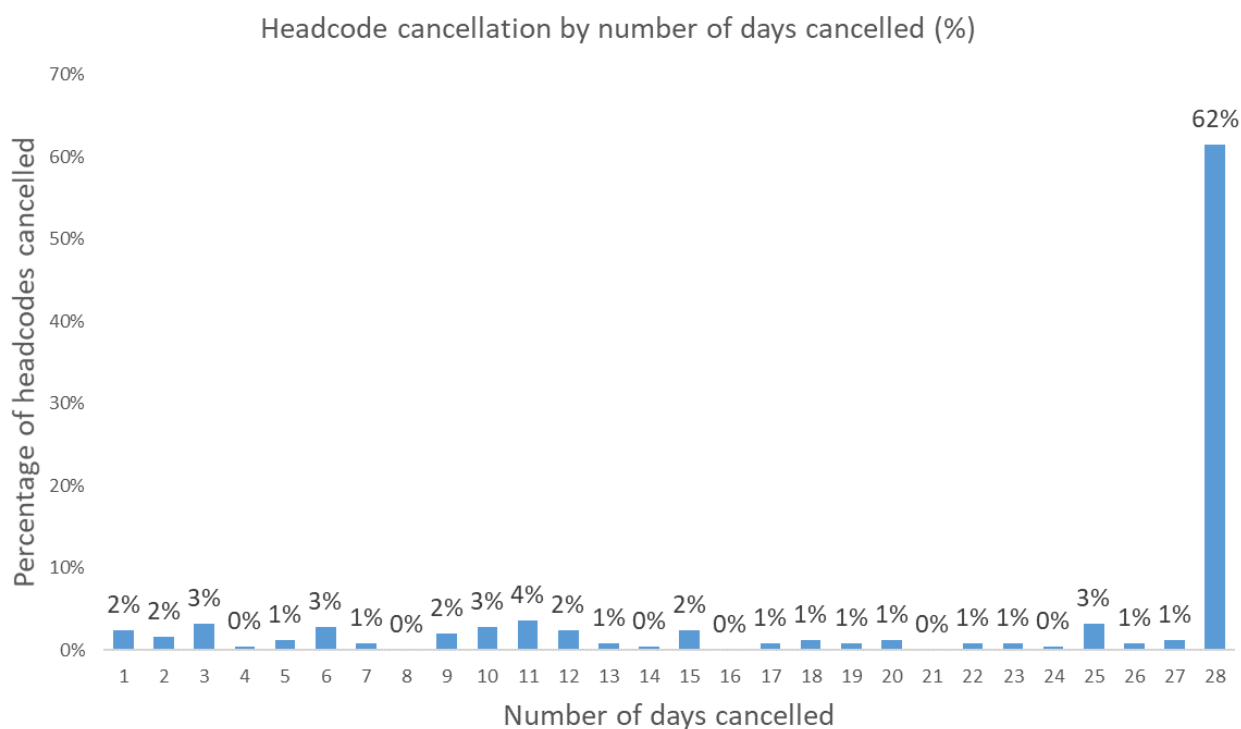
Cancelled and 'delayed' trains

4.29.   The number of trains affected by the Beta list meant that controllers faced extremely compressed timeframes for updating systems. As a result they often did not have time to complete the deletion of all services on their lists. This meant that a passenger would have even less notification about the cancellation of these services. For

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[36] TRUST (Train Running Under System TOPS a computer system used for monitoring the progress of trains and tracking delays).
[37] Darwin is the rail industry's official train running information system.

example, they could check a journey planner the evening before or very early on the morning of travel and find a service listed as running, only to find it cancelled when they arrived at the station.

4.30. In addition, some trains in the process of being cancelled in the systems sometimes were not removed until the train was due to have started its journey, leading to Customer Information System (CIS) screens showing '*Delayed*' for a period before the train was then cancelled.

4.31. The processes that GTR relied on throughout the time Alpha and Beta lists were employed were heavily reliant on manual intervention and crosschecking complex information. This increased the risk of errors, omissions and duplication. Evidence suggests that this was borne out in the often incorrect or confusing information that passengers and staff were then receiving. This also goes some way to explain why many passengers found that information in journey planners sometimes did not reflect what they found when arriving at the station.

Golden trains

4.32. Controllers at GTR were concerned about the large gaps that were appearing between services and undertook gap analysis to define the scale of the problem. GTR developed a list of priority services (known as '*golden trains*') that should be protected from cancellations where possible and also provided replacement buses and taxis in some cases. One of the purposes for the golden trains was to transport school children to exams. GTR contacted schools and parent groups to notify them of the trains, and while these steps represented positive action by GTR for these affected passengers we have not seen evidence that this list of protected services was disseminated more widely.

Ghost trains

4.33. Where crew and rolling stock became available it was sometimes possible to reinstate trains from the Beta list. This was a positive approach even if in some cases trains ran where advertised buses were also operating. Instructions issued within Control identified that the staff did not always remember to include platform information for each station call when they were reinstating the trains. As a result the trains would not appear on platform departure screens, meaning that a train could arrive unannounced. In some cases a standard message on the Customer Information System (CIS) screens would even advise passengers not to board the train. Passengers often referred to these services as '*ghost trains*'. This occurred if the service had not been successfully entered into systems by Control. To mitigate against this, when station staff had the information they were able to make announcements about the expected arrival of these ghost services and where they were expected to stop. From a passenger perspective, this increased the lack of trust with the automated information systems.

Special Stop Orders (SSO)

4.34. One of the ways GTR sought to mitigate the impact of cancelled services on passengers affected was by scheduling other services to make unplanned stops at certain stations where there were service gaps. While this can have a performance impact it was decided that the need to fill gaps in the service was more of a priority. However, it could result in delays to following trains while the expected non-stop train made additional calls.

4.35. In normal circumstances, station staff can request a SSO from Control if they have identified a need, such as a gap in service caused by cancelled trains. Later in the period a standard list of SSOs was included in the daily Alpha plan which was issued to staff and stops were shown in journey planners and on station screens. Implementation of a stop order still requires a member of staff to give a piece of paper to a driver detailing the changes. Initially there was often confusion about whether additional stops would be made when they were not always shown on station Customer Information System (CIS) screens and on-board train screens. In addition, some drivers refused to accept the orders (for example if it would have taken them over their hours or delayed a subsequent working) meaning that arranged stops were not honoured.

4.36. Passengers expect their journey to take a specific amount of time based on timetable information. As a result of additional stop orders, those particular services ended up taking longer than expected and many passengers stated if they had known this in advance of boarding they may have chosen an alternative train. In addition, when information screens did not show the additional stop, passengers may not have boarded a train that was subsequently given a SSO to call at the station they wanted to travel to.

Equipping passenger-facing staff with information

4.37. Decisions made in the recovery plan also impacted heavily on passenger-facing staff. The daily Alpha plan was circulated via the staff 'station thread' email each day and included details of changes to driver diagrams, special stop orders and trains that would be cancelled. Documents reveal many instances where from 20 May until the introduction of the interim timetable on 15 July staff reported not having access to the correct information in advance of when it was needed. Our analysis has revealed situations where staff had no more knowledge than passengers waiting at stations as they were not informed of decisions being made in Control. This caused confusion and created a situation where staff could have provided passengers with information believed to be correct, only later to find that it was wrong. This then served to also undermine passengers' confidence in GTR staff.

Additional measures for disabled passengers

4.38.   As discussed in Chapter 2 passengers with disabilities were also severely impacted by the poor or changing information during the May 2018 timetable disruption. As a result of short-notice cancellations and GTR's decision to revise the service plan overnight for the following day, this may have created significant additional challenge for some passengers with booked assistance where the train that they had booked on was then no longer running.

4.39.   However, GTR put in place proactive arrangements for passengers who required assistance. Their support team structure was changed and additional staff were added to the customer contact centre to review every booking for the day ahead. Customers who would be impacted by cancellations were contacted to discuss alternative arrangements, such as booking on another service or arranging a taxi. This process commenced at 0600 each morning, with four checkpoints throughout the day to check for booked assistance. We saw evidence that GTR had sought to be as proactive as possible in seeking to mitigate some of the impact of the disruption upon its passengers who were reliant on booked assistance to make their journeys.

Rail replacement bus services

4.40.   GTR staff in Control worked to identify where cancellations were causing unacceptable gaps in service frequency. This was a particular issue on Great Northern, especially at the smaller stations on the Peterborough line where Thameslink services now provide the full off-peak service but were seeing many cancellations[38]. Staff at these stations used the 'station thread' e-mail facility to update Control when they saw large gaps or had large crowds of passengers. GTR utilised buses to fill gaps in train services at certain stations, with 219 secured for the Great Northern route on 29 May. Buses were arranged to be held on standby at key locations and to operate guaranteed services for schoolchildren, many of whom were facing exams in the disrupted period. This was a positive operational move as an attempt to address timetable gaps and increase reliability for passengers.

4.41.   However, bus times and routes were not shown in journey planners, so passengers were unable to check for details and may not have known that buses were running at all. By 10 June, bus allocation plans were issued to Control and station staff but services were still not shown in journey planners. At bus hub stations, staff would be able to provide assistance but passengers at intermediate stations would be unable to plan as the information they needed was not available.

4.42.   Feedback, including from Transport Focus, alerted GTR to this issue and some scheduled buses, still supported by *ad hoc* standby vehicles, were added to journey

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[38] Transport Focus submission to the Inquiry - http://d3cez36w5wymxj.cloudfront.net/wp-content/uploads/2018/07/20155005/Submission-to-Glaister-Inquiry-passenger-impact-July-2018.pdf

planners from 12 June, two weeks after GTR secured the buses for the Great Northern route. This provided passengers with the opportunity to make more informed journey decisions. GTR's action to implement bus services to address timetable gaps was positive, although the information passengers needed was lagging behind the service recovery efforts.
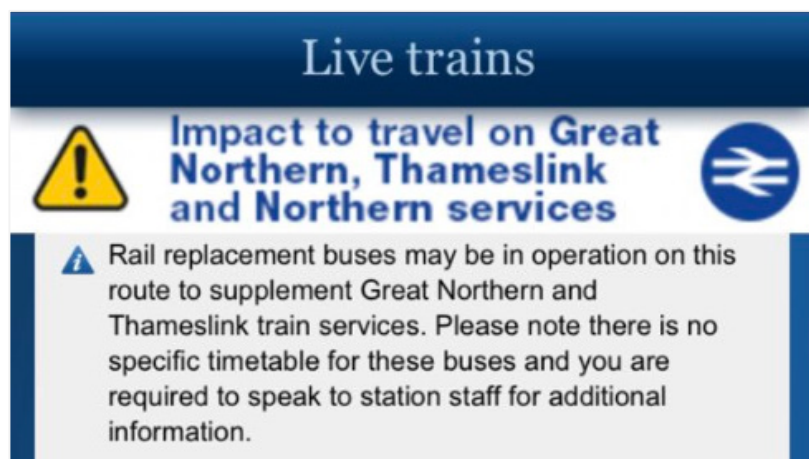
14 June 2018

4.43. The location of replacement bus stops is normally shown on posters at stations. While for most stations it will be the station forecourt, some stations have the buses stopping away from the station.

4.44. When we checked the GTR and NRE websites for this information, the posters providing this information were not available for a number of stations including Hatfield, Welwyn Garden City, Letchworth and Hitchin. We know from issues raised with GTR previously that unlike its west coastway route where replacement bus stops have a distinctive Southern railway replacement bus flag, most replacement bus stops away from stations (for example Bishopstone and Salfords) are not marked as such.

4.45. The good practice guide for passenger information[39] says that planned replacement bus times should be entered into Darwin and bus departures should be shown on real time information screens at stations. Without this information passengers may not benefit from the use of a replacement bus service.

Weekend timetables

4.46. In the pre-20 May period although weekday timetables were provided, the weekend timetable was not. For a period after 20 May, the journey planners were showing incorrect times as the timetable itself had not been finalised by NR. On Thursday 24 May, GTR produced PDF timetables for the following Saturday and posted them on RailPlan2020. Sunday timetables were posted on the Friday. The weekend services represented a much reduced level of service with many of the new Thameslink routes (e.g. Cambridge to Brighton) not operating and service frequencies reduced below that operated before 20 May (e.g. only one fast train each hour from Kings Cross to Cambridge rather than two). On Saturday 26 May, GTR noted that the overnight download of the timetable by Network Rail had resulted in the journey planners showing incorrect times for travel on that day. Corrections for Saturday and Sunday were made manually by Control.

4.47. GTR noted that the base timetable (before engineering work adjustments) for weekends had not been received from Network Rail by Monday 11 June.

4.48. In September, ORR wrote to GTR[40] to highlight the short notice being given to passengers who were trying to plan or make journeys at weekends. In the letter dated 5 September, we noted that alterations for 8 September when the Brighton mainline was to be closed between Three Bridges and Brighton had not been made. Despite the complete closure of the line, through running Thameslink trains were still being shown in journey planners. We also raised this with the Brighton Mainline project which was responsible for providing communications for this work.
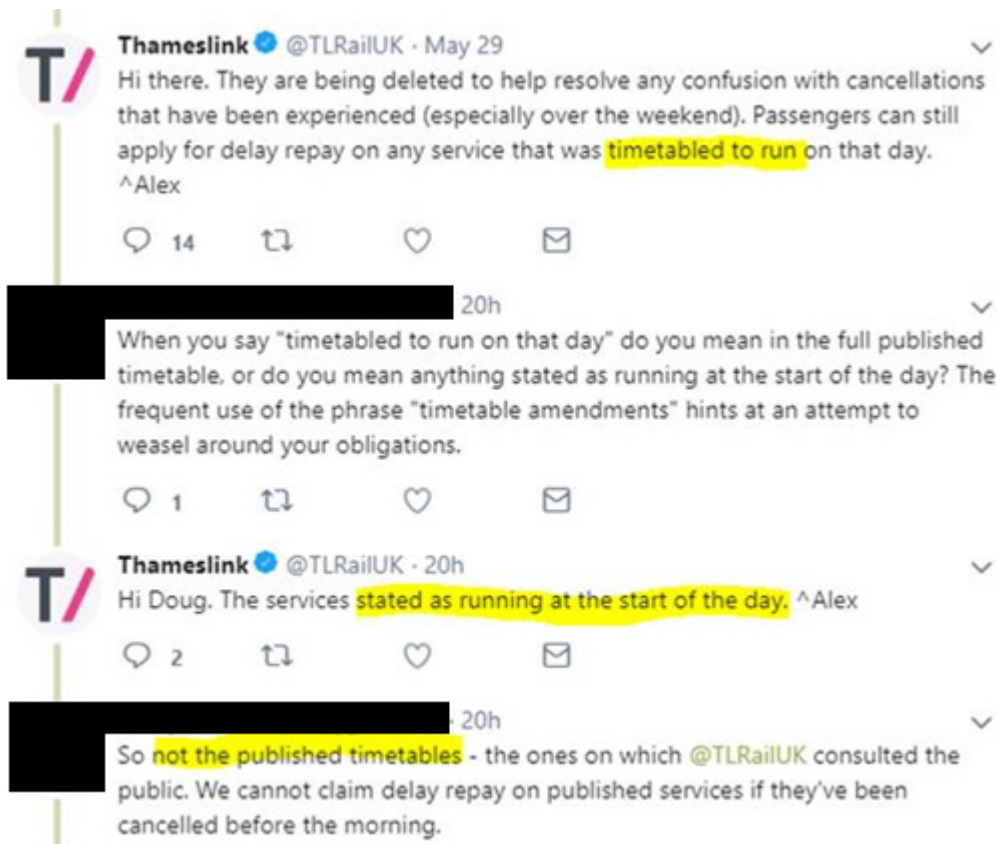
Delay compensation

4.49. Giving passengers good information about compensation in the event of delay is accepted as an important component of the overall passenger experience (whether this information is given during or after the journey itself). Passengers who experienced delays on their journey were encouraged to claim Delay Repay by GTR. In normal circumstances Delay Repay can only be claimed against the 'timetable of the day' meaning that all the trains that had been deleted could not be claimed against. Initially

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[39] ATOC document - not publicly available.
[40] http://orr.gov.uk/__data/assets/pdf_file/0010/39349/inadequate-notice-of-weekend-timetables-letter-to-gtr-2018-09-05.pdf

passengers enquiring on Twitter were given that information and told that they could not claim (although we did see inconsistencies in the advice that was given):

> **Thameslink** ✓ @TLRailUK · May 29
> Hi there. They are being deleted to help resolve any confusion with cancellations that have been experienced (especially over the weekend). Passengers can still apply for delay repay on any service that was ==timetabled to run== on that day. ^Alex
>
> 💬 14   🔁   ♡   ✉

> 20h
> When you say "timetabled to run on that day" do you mean in the full published timetable, or do you mean anything stated as running at the start of the day? The frequent use of the phrase "timetable amendments" hints at an attempt to weasel around your obligations.
>
> 💬 1   🔁   ♡   ✉

> **Thameslink** ✓ @TLRailUK · 20h
> Hi Doug. The services ==stated as running at the start of the day.== ^Alex
>
> 💬 2   🔁   ♡   ✉

> 20h
> So ==not the published timetables== - the ones on which @TLRailUK consulted the public. We cannot claim delay repay on published services if they've been cancelled before the morning.

4.50.   Other passengers were advised they could make claims against services in the original timetable that had been removed from journey planners as well as those listed in journey planners on the day:

> 9h
> @TLRailUK can you please tell me what happened to the 8.19 from Carshalton to Blackfriars, the entire service has disappeared. Is this a new technique to avoid paying compensation?
>
> 💬 1   🔁 1   ♡ 1   ✉

> **Thameslink** ✓ @TLRailUK · 8h
> Hi Jason. No it is not. Delay Repay is still eligible for cancelled services. If a service has been removed it means it has been cancelled. The removal of cancelled trains is to give passengers a clear idea of services actually running ^Nafisa
>
> 💬 1   🔁   ♡   ✉

4.51.   After ORR sought clarification on this issue the messaging was changed on 31 May to make it clear that compensation could be claimed against the original May timetable (which was made available on RailPlan2020) irrespective of what had operated on the day.

4.52. Passengers using the GTR Key smartcard also found that their automatic Delay Repay process became unreliable in this period. In response, the GTR Twitter team advised passengers to make manual claims instead. GTR subsequently informed us that season ticket holders who might have been affected received an e-mail highlighting the issue.

> Due to the recent levels of disruption to services, and short notice alterations, our Auto Delay Repay notification service may not operate as effectively as normal. During this time, we advise Key Smartcard customers to make manual Delay Repay claims via our **online webform**

GN website 10 August
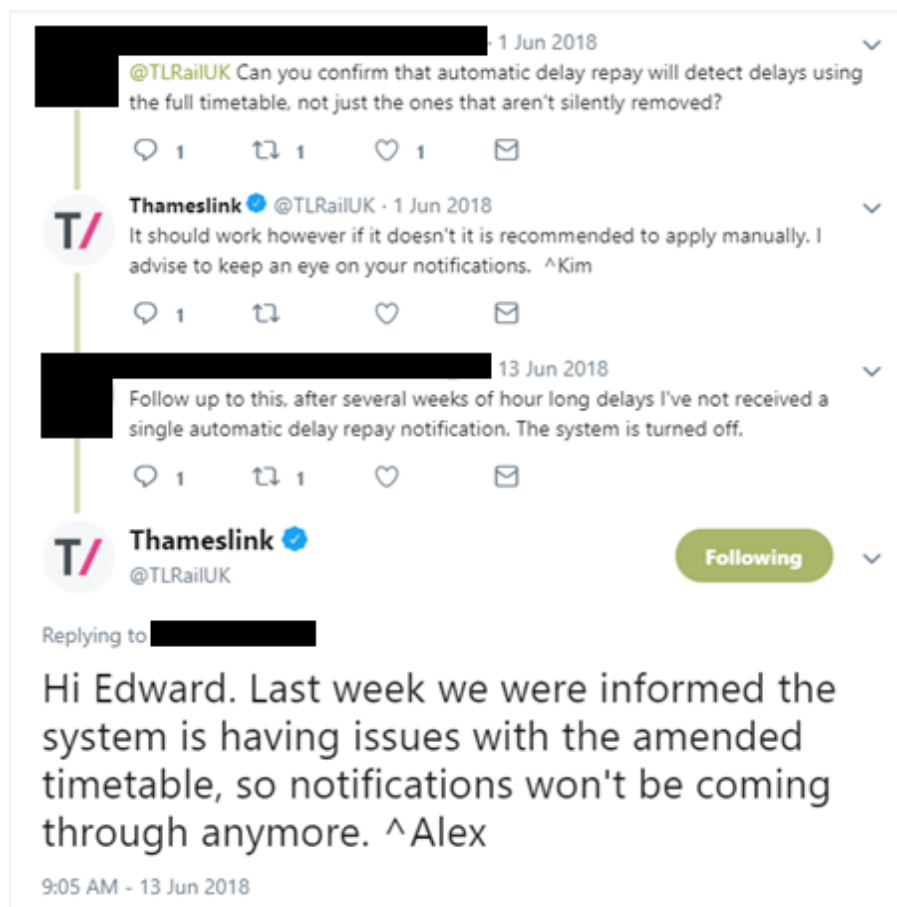
4.53. Although GTR has a 15 minute threshold for compensation it also operates an enhanced compensation scheme[41] for passengers that are delayed by more than 30 minutes on 12 occasions within a 28 day railway period. As it does not offer a claim history service on its Delay Repay website this required passengers to keep a separate note and evidence of these delays which then had to be submitted separately using a paper form. Signposting on the GTR website did draw attention to the enhanced

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[41] https://www.thameslinkrailway.com/help-and-support/journey-problems/delay-repay/enhanced-compensation

compensation provision but because the claims process was potentially confusing and onerous it may have dissuaded some passengers from claiming.

4.54. In July, GTR announced that additional industry compensation would be available to season ticket holders who had been affected by the disruption. Depending on the journey made this could be up to the cost of 4 weeks travel[42]. In August 2018 this was extended to some other regular travellers[43]. Claims for travel between 20 May and 28 July 2018 could be made until 31 January 2019. GTR reported that over 74,000 claims have been made under this scheme.

Related issues

■ Passenger information at King's Cross and St Pancras

4.55. The change of some Great Northern services to Thameslink meant some trains that previously ran from Kings Cross now departed from St Pancras. With the departure boards at King's Cross no longer showing these trains, passengers who previously travelled from King's Cross may not have been aware that their train now operated from St Pancras.

4.56. On the Great Northern where gaps arose in the Thameslink service through Central London, GTR Control arranged for services to run but terminate at or start from Kings Cross rather than St Pancras, as they had before the timetable change. However, passengers were not made aware of this because information about trains departing from the adjacent station was not shown on the Customer Information System (CIS) screens at either station[44]. The two adjacent stations are unusual in railway operations terms as once the trains have departed from London they follow the same route and stopping pattern to their destination. This is why the inclusion of St Pancras departures (for Great Northern stations) is appropriate at Kings Cross but why trains from Liverpool Street to Cambridge which follow a completely different route are not shown.

4.57. Changes to the Customer Information System (CIS) screens at Kings Cross and St Pancras made to highlight these services were not made until September 2018. GTR also arranged for station specific messaging to be added to online live departure boards for those stations. In addition, NRE recognises a new London station in the journey planner, allowing journeys to be planned to or from London Kings Cross St Pancras (All stations) when using the NRE website. However, this station is not available in apps, including those provided by GTR.

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[42] https://www.mynewsdesk.com/uk/govia-thameslink-railway/pressreleases/govia-thameslink-railway-announces-details-of-compensation-for-great-northern-and-thameslink-passengers-2581899

[43] https://www.alistair-burt.co.uk/news/gtr-extends-industry-compensation-scheme-non-season-ticket-holders
[44] ORR wrote to GTR on this issue in September 2018 and improvements have now been made. http://orr.gov.uk/__data/assets/pdf_file/0010/39349/inadequate-notice-of-weekend-timetables-letter-to-gtr-2018-09-05.pdf

4.58. While we welcome the changes that have been made, the switch of London stations was a foreseeable issue and one that the Thameslink project should have addressed before the timetable change.

■ Reasons displayed regarding the causes of delayed or cancelled services

4.59. Aware that some trains would not operate because of suitably trained crew not being in the right places, GTR adopted the term 'operating incident' to describe these occasions. There is no suitable standard industry message that relates to train planning issues and GTR felt that 'due to a shortage of train crew' did not correctly explain the situation. However, in the subsequent disruption when passengers tweeted GTR to ask about the 'operating incident' affecting their intended service, GTR's Twitter team often took a standard approach of responding. Sometimes this served to irritate passengers more and missed an opportunity to explain the issues that were affecting the network. In response to negative passenger feedback about this practice, use of 'operating incident' was officially discontinued on 22 May. However, it was still used and the explanations did not improve. In its submission to the Inquiry, Transport Focus noted the continued use of the phrase "due to an operating incident".

18 Jun 2018
@GNRailUK @TLRailUK we are all waiting here at Finsbury park , told due to operating incident, the train to Cambridge norrth is delayed (the stuff on the platform) doesn't know how long it will be delayed for. Could you tell us what is the 'operating incident' at kgx station

Great Northern @GNRailUK · 18 Jun 2018
Hi there. The next service to Cambridge North is the 09:01, but the next service to Cambridge main is the 07:46. VEry sorry for this. ^Alex

Follow

Replying to @GNRailUK

Thank you Alex, yet we don't know what the operating incident is. Why is it kept hidden from the commuters who spend thousands of pounds every year on trains?

8:22 AM - 18 Jun 2018

Tweet your reply

18 Jun 2018
Replying to @GNRailUK
Operating incident = no driver

May 21
@TLRailUK What is meant by 'operational incident'--- if you haven't got enough drivers, or the timetable does not work, or there is someone on the line. Just tell us. If you want support of customers, integrity and honesty is paramount. Hiding behind jargon alienates everyone.
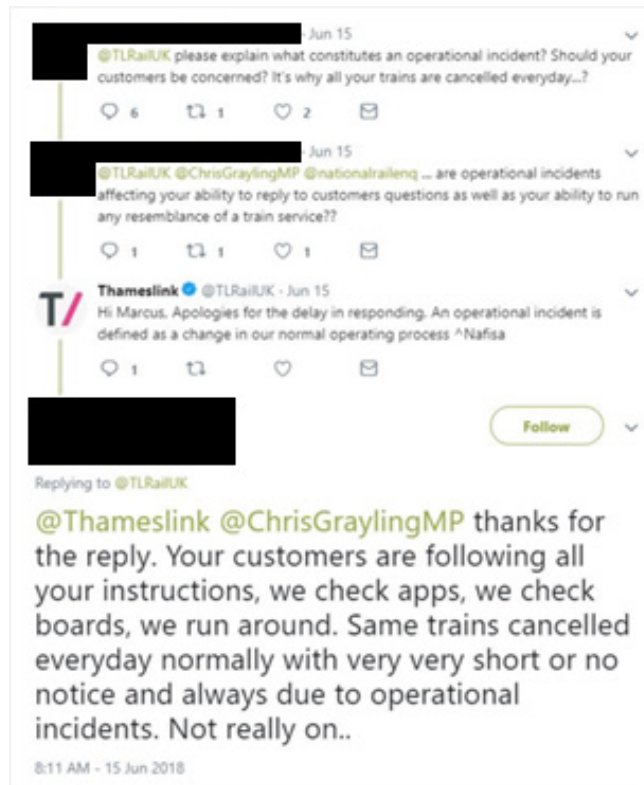
Thameslink @TLRailUK

Following

Replying to

Hi Joseph. Agree with your comment and we do our best to give as much detail normally about disruption. For an operating incident this will be an incident is requiring further investigation. As this can include human error we would be limited in the info that we can give. ^Neil

12:24 PM - 21 May 2018

- ■ Information displayed on the train Passenger Information Systems

4.60. Thameslink services are provided using class 700 trains. These include a modern Passenger Information System (PIS) which gives information such as London Underground status, train loading and toilet availability in addition to route information. Being a fixed formation 8 or 12 car train also means that the trains are too long for the platforms at some of the stations that they routinely call at and selective door operation notices are provided by the system. Drivers programme the system by entering a code for the journey that they are making. There is also a depot code, sometimes referred to as the 'get me home' code which can be used if the journey is different to the standard route. However, this results in the screens displaying a 'please listen to announcements' message.

4.61. The ATOC Code of Practice on Customer Information[45] ('the Code') notes the importance of displaying correct information on the train, especially during disruption. Unfortunately, the short notice changes to calling patterns and changes to train destinations cannot easily be shown on screens on trains which were then either set to 'please listen to announcements' or turned off completely. In addition, a new software download during the period resulted in the screens often getting stuck on particular screens even if the announcements were working.

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[45] https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469771025

4.62. We observed that the faults were being regularly reported to GTR via passengers using Twitter. Due to an apparent lack of improvement in the performance of the screens we wrote to GTR[46] in September 2018 to ask for reassurance that these issues were being taken seriously and that drivers knew that they needed to make announcements.

4.63. In its reply of 17 September, GTR noted that some of its trains would be unable to show the correct information until December 2018[47] , "*A new database is currently being loaded onto the 700 fleet which will add the additional services needed post the May TT introduction. GTR are a third of the way through installation, with all services envisaged to be loaded by December 2018.*"

Findings

4.64. We consider that the exceptional circumstances that followed the introduction of the 20 May timetable meant that providing perfect advance information for all services was, from the outset, an impossible task. Evidence demonstrates that GTR's overriding focus throughout the period that followed 20 May was on providing as much capacity as it could to meet customer demand.

4.65. Our guidance to support compliance with condition 4 recognises that timetabling services and providing information to passengers are difficult, complex tasks. There is a balance to be struck between service delivery and the ability to provide appropriate, accurate and timely information for passengers during sustained periods of disruption. The licence condition is not intended to undermine the primary objective of providing the best available services for passengers.

4.66. We accept that the immediate response to the timetable change required a period of reactivity as both the scale and severity of the disruption emerged. However, we consider that better passenger information should be a core element of the service recovery process and as time progressed an increasingly improving picture should have emerged. Against this context we consider that there is evidence to suggest that GTR failed to achieve an appropriate balance between service recovery and the need for appropriate passenger information to an unacceptable extent and duration throughout the initial phases of the Service Recovery Plan.

4.67. In particular, we found the following failings.

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[46] http://orr.gov.uk/__data/assets/pdf_file/0010/39349/inadequate-notice-of-weekend-timetables-letter-to-gtr-2018-09-05.pdf

[47] https://orr.gov.uk/__data/assets/pdf_file/0009/39348/inadequate-notice-of-weekend-timetables-letter-from-gtr-2018-09-17.pdf

Aligning service recovery with passenger information obligations

4.68.   We consider that GTR took operational decisions with the best of intentions. Nevertheless, evidence from a range of internal and external sources revealed that while the continued efforts being made to improve and stabilise services at an operational level throughout Phase 1 and 2 of the Recovery Plan were having some success, the full benefit of this improvement was not felt in passenger outcomes due to the fact that it was often not supported by appropriate, accurate or timely passenger information.

4.69.   We consider that too often there was a failure in operational decision-making to give adequate regard to the fact that running a train service (or rail replacement bus) is only helpful to passengers if they know when and where the service will arrive, where it is going and how long the journey will take. Moreover, the persistence of these information failures over such a sustained period of time, coupled with the lack of evidence as to the company developing any timely or proportionate response to these issues, lead us to conclude there had been a fundamental problem at both a strategic and functional level in aligning operational recovery with passenger information obligations.

Provision of 'Alpha list' and other journey information

4.70.   One of the key methods used by GTR to achieve stability in its service recovery process was the reduction in train services that resulted from the use of the 'Alpha list'. This required the identification of specific train services that it was unable to run and which could be removed from the timetable. Evidence demonstrates that the Alpha list was used, but was not clearly communicated to passengers between 6 June and 25 June (at which point GTR made PDF timetables available with the Alpha trains removed).

4.71.   The delay in sharing clear information regarding the cancelled Alpha trains meant that passengers were unable to identify trains that were never planned to run on a weekly basis and ones that were removed on a daily basis (from the Beta list). This is evidenced by consistent feedback from passengers regarding their frustration at having very little notice or certainty about which services would be running or cancelled for a prolonged period.

4.72.   GTR wrote to us stating that while the Alpha '*list proved to be generally consistent throughout the period to the 25 June 2018, this was not known at the time, the list was not believed to be a static one and was being constantly reviewed and at times was altered to reflect daily operational circumstances*'. However, we found evidence from internal documentation to indicate that the Alpha list was indeed '*fixed*', including a service recovery governance document that identified 326 trains as '*permanently removed*' from the timetable from 11 June.

4.73. We therefore consider that GTR's failure to clearly communicate known cancellations in a timely manner undermined the ability of prospective passengers to plan ahead and make informed journey decisions. The Alpha list information could have been published sooner than 25 June, which would have provided greater certainty to passengers about services which were not planned to run.

4.74. The provision of rail replacement buses on some routes was a notable example where GTR had allocated significant resource to mitigate disruption and stabilise service provision, yet passengers were unable to take full advantage of this for a sustained period due to delays in making this information available in journey planners.

Day to day amendments

4.75. A related aspect of GTR's Service Recovery Plan was that additional services were removed or cancelled on a day by day basis. This list of services was known as the 'Beta list'. The Beta list trains were removed individually by GTR staff in its Three Bridges Control Centre ('Control') on an overnight basis. This process led to very short notice changes to the timetable and a severe lack of certainty for passengers up until the point of travel. This is evidenced by GTR's advice to passengers to 'check as close to the time of travel as possible' or to 'check immediately before travel'. However, at times, trains in the process of being cancelled in systems were not removed until the train was due to have departed, leading to Customer Information System (CIS) screens showing 'delayed' for a period before the train was subsequently cancelled.

4.76. GTR persevered with this process until the introduction of an interim timetable on 15 July, in effect accepting the ability to make overnight and very late notice changes despite the impact that this had on the provision of passenger information for a prolonged period. Other day to day changes were utilised - for example reinstating Beta trains as crew and rolling stock became available - to increase capacity and thereby benefit passengers, but at times these changes were poorly executed resulting in what passengers referred to as 'ghost trains'.

4.77. Operational decisions taken and implemented to support the recovery process were, in many cases, to the detriment of providing passengers with appropriate, accurate and timely information to an unacceptable extent and duration. Deleting trains from the timetable rather than cancelling services in advance meant that services did not show as cancelled on journey planners or appear at all on CIS screens. Passengers were uncertain what services would run each day; travelling on a particular train on one day was no guarantee that it would run or be shown on station screens on the next day. This added to the confusion for passengers who were still trying to come to terms with a timetable in which the time of every train had changed.

4.78. There is substantial evidence to demonstrate the dedication and commitment of GTR staff in managing significant operational issues in difficult circumstances. However, on a day by day basis the issues described here, and elsewhere in this chapter, also

served to undermine the ability of some frontline staff to have access to the information needed to assist passengers in making their journey.

4.79. We consider that the cumulative effect of the factors described here manifested in the unacceptable passenger outcomes described in our evidence report and in the numerous examples of passenger information failures.

5. Wider observations

Summary

This chapter summarises related observations arising from this investigation.

Introduction

5.1   In considering the evidence gathered as part of this investigation, we have also identified a number of areas for possible future improvements. These are summarised below.

Wider observations

### PIDD arrangements not ideal for longer term disruption

5.2   Industry arrangements for dealing with disruption are mainly focussed on dealing with situations that arise during the day. The procedure for 20 minute updates of the core message may not be suitable for disruption that is likely to run for several weeks. The ACOP notes that

- In the event of longer term disruption – railway undertakings, where possible, should develop a process that enables passenger information to be fed into downstream systems at the earliest practical opportunity for the duration of the disruption.

Using 'yellow triangles' on National Rail Enquiries (NRE)

5.3   Yellow triangles with exclamation marks inside are normally used on NRE to identify services which are disrupted. Other icons that are routinely used include a red triangle for cancelled trains and a blue "information" triangle which is often used for bus services.

5.4   On 9 April, GTR asked that NRE put the following messages on all GTR train services in the current timetable (before 20 May), even those where new Thameslink services would not be operating. The initial impression from seeing a screen full of warning triangles is that there is current disruption.
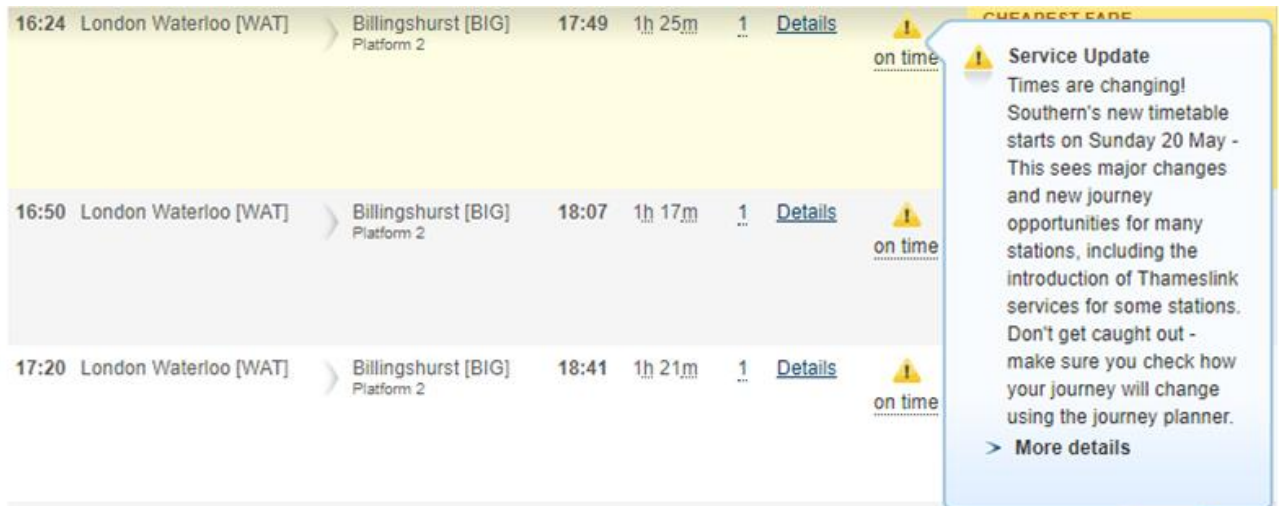
5.5   We recognise that the use of icons in this instance was intended to draw attention to the timetable change. The message itself was unhelpful because the "more details" link just took the user back to the journey planner rather than linking to a site such as RailPlan2020 that gave more information. Its tone was more promotional than informative which is out of step with normal NRE messaging. The blanket labelling of trains in the current timetable with a message that only applies to a future journey, rather than the one that the passenger has researched, was unprecedented.

5.6   Blanket use of yellow triangles can mask actual service disruption. Industry should ensure that appropriate icons are used for service messages and that the icons do not mislead passengers. It should also decide whether it is appropriate to label current trains with a message that only applies to a future journey – when that is not what the passenger has asked for information about. If appropriate this may be better delivered via a live departures station message.

Use of replacement buses

5.7   While replacement buses generally depart from the station forecourt, this is not always the case. In order to give confidence to passengers and to assist rail replacement bus drivers who may not be familiar with the route, bus stops should be clearly marked with a distinctive flag, such as those used by Southern on its West Coastway route.

5.8   The location of the replacement bus stop should be easily available, via station posters and the station facilities feed online. When buses are in use this could be supplemented with additional signs/posters at the station. Our check of station information showed that this was not available for a number of stations where the NRE feed was missing information. Paragraph 7.3 of the ACOP notes the importance of

keeping this information up to date. We suggest that routine checks are made to ensure that the functionality is working as expected.

Disruption mode

5.9   Station Customer Information System (CIS) screens may become overwhelmed or result in numerous announcements about cancelled trains when the service is disrupted. Paragraph 7.3 of the ACOP makes provision for the use of "disruption mode" when large numbers of trains are cancelled. When activated this removes some scheduled messaging and only shows trains that have been confirmed as running.

> **Customer Information Screens**
>
> The accuracy of CIS is incredibly important as an information source for both customers and employees. Ensuring this information is accurate and relevant must be a priority for the station facility owner and consequently it may be necessary to show only trains that are running when large numbers of trains are cancelled.
>
> Station facility owners should document their policy for the suppression of non-critical messages and the action that can be taken if message integrity becomes poor/the system is overwhelmed, including the introduction of "disruption mode".

5.10   In this case GTR reported that widespread use of disruption mode caused some unexpected results and so it switched to deleting cancelled trains instead. The benefit of using disruption mode is that, while trains do not appear on station screens, the cancelled services still show in journey planners and apps. This allows passengers to get a better understanding of what is happening to their normal service. Having arrangements for the implementation of disruption mode is a requirement of the ACOP and should be provided in the local plan.

ANNEXES

Annexes:

Annex A: Glossary

Annex B: Terms of reference of investigation

Annex C: Condition 4 of GB Statement of National Regulatory Provisions: Passenger

Annex D: Legal framework and policy - Railways Act 1993 legislation

Annex A: Glossary

CIS – customer information system – screens on platforms at stations

DARWIN - Darwin is the rail industry's official train running information system.

DfT - Department for Transport

GN – Great Northern –a trading name of Govia Thameslink Railway Ltd

GTR - Govia Thameslink Railway Ltd, operator of the Thameslink, Southern and Great Northern franchise

NR - Network Rail

NRE - National Rail Enquires website www.nationalrail.co.uk

OIS – operational information system – information screens giving general information at some stations

ORR - Office of Rail and Road

PIDD - Passenger Information During Disruption

Railplan 2020 – the GTR website set up to manage passenger communication of the timetable change - www.railplan2020.com

RDG - Rail Delivery Group

SNRP - Statement of National Regulatory Provisions

SO – The Network Rail System Operator

TF - Transport Focus

TLP - Thameslink programme

TOC - Train Operating Company

TOPS - a computer system used for monitoring the progress of trains and tracking delays.

TRUST - Train Running Under System TOPS

Annex B: Terms of Reference for the Investigation

Annex: Terms of reference for a formal investigation into the issues relating to GTR's provision of passenger information ahead of and after implementation of the 20 May 2018 train timetable.

Purpose

To establish whether GTR did everything reasonably practicable to meet its obligations contained in condition 4 of its' Statement of National Regulatory Provisions, namely the provision of passenger information.

Scope

Based on initial analysis of the evidence gathered as part of our inquiry into the timetable disruption in May 2018, ORR is particularly interested in the following areas (although the investigation may be wider depending on the evidence that emerges):

The provision of appropriate, accurate and timely information provided:

> a) to passengers and prospective passengers prior to the implementation of 20 May 2018 timetable; and

> b) to passengers during the subsequent disruption over the weeks following 20 May 2018. This is a formal investigation and is separate to the ongoing monitoring and investigative informed traveller (T12) activities initiated by ORR in February 2018.

Methodology

ORR will use evidence gathered from its current monitoring and inquiry to date and any further information provided to us in the course of this investigation including by GTR, Network Rail, other operators, funders and other parties to assess:

- the steps GTR has taken or is taking to address the issues, make improvements and recover;

- whether there are any systemic issues; and/or

- whether there are any mitigating factors which should be considered in this case.

Investigation team

This investigation is led by Stephanie Tobyn as Deputy Director, using a project team drawn from consumer and network regulation functions, ORR.

How the investigation will be conducted

In carrying out its investigation, ORR expects to draw upon information and reviews already carried out internally as part of its usual regulatory roles as well as any new information relevant parties provide to us during the course of this investigation. The review will engage primarily with GTR, as well as Network Rail and funders. This will be a focused investigation with the aim to completing it by the end of November 2018.

Annex C: Condition 4 of GB Statement of National Regulatory Provisions: Passenger

Condition 4: Information for Passengers

Purpose

1.   The purpose is to secure the provision of appropriate, accurate and timely information to enable railway passengers and prospective passengers to plan and make their journeys with a reasonable degree of assurance, including when there is disruption.

General duty

2.   The SNRP holder shall achieve the purpose to the greatest extent reasonably practicable having regard to all relevant circumstances, including the funding available.

Specific obligations

3.   The following obligations in this condition are without prejudice to the generality of the general duty in paragraph 2 and compliance with these obligations shall not be regarded as exhausting that general duty. In fulfilling these obligations the SNRP holder shall at all times comply with the general duty in paragraph 2.

Planning services

4.   The SNRP holder shall cooperate, as necessary, with Network Rail and other train operators to enable Network Rail to undertake appropriate planning of train services and to establish or change appropriate timetables, including when there is disruption.

5.   In particular, the SNRP holder shall:

(a) provide Network Rail with such information about the SNRP holder's licensed activities as may be reasonably necessary for Network Rail to fulfil its obligations relating to timetabling in its network licence;

(b) participate constructively in any timetabling consultation carried out by Network Rail;

(c) use reasonable endeavours to resolve promptly any timetabling disputes; and

(d) respond expeditiously to any timetabling matter which Network Rail reasonably considers to be urgent.

Code(s) of practice and improvement plan(s)

6.   The SNRP holder shall, unless ORR otherwise consents, publish one or more code(s) of practice or other documents setting out the principles and processes by which it will comply with the general duty in paragraph 2.

7.   Where the SNRP holder considers, or is directed by ORR, that improvements to its arrangements for the provision of information to railway passengers and prospective passengers are necessary or desirable to enable it better to fulfil the general duty in paragraph 2, it shall develop, publish and deliver a plan, which sets out the improvements it intends to make and the dates by which such improvements will be made.

8.   The SNRP holder shall, from time to time and when so directed by ORR, review and, if necessary, revise, following consultation, anything published under paragraph 6 and any plan under paragraph 7 so that they may better fulfil the general duty in paragraph 2.

9.   ORR shall not make any direction under paragraphs 7 or 8 without first consulting the SNRP holder. Provision of information to intermediaries

10.   The SNRP holder shall as soon as reasonably practicable:

      (a) provide to the holders of passenger and station licences; and

      (b) provide to all timetable information providers on request reasonable access to

      appropriate, accurate and timely information to enable each on request to provide passengers with all relevant information to plan their journeys including, so far as reasonably practicable, the fare or fares and any restrictions applicable.

11.   In this condition:

      "Network Rail" means Network Rail Infrastructure Limited (a company registered in England and Wales under number 02904587), and its successors and assigns.

Annex D: ORR's Approach to Economic Enforcement

The statutory framework

ORR enforcement powers and the processes for using these powers are contained in the Railways Act 1993 ("the Act").

ORR must exercise its functions (including its enforcement function) in the manner which it considers best calculated to achieve a series of duties set out at section 4 of the Act. Those duties include protecting the interests of users, the promotion of competition, efficiency and economy in the provision of services and enabling operators to plan their businesses with a reasonable degree of assurance.

Final orders

There is an obligation on ORR to make an enforcement order if we are "satisfied" that a licence condition is being contravened or is likely to be contravened, unless one of the statutory exceptions applies:

- We consider it requisite that we should make a provisional order[48] (see below); or

- One of the relevant statutory exceptions applies, namely:

  - Our section 4 duties preclude us from making the order[49];

  - we are is satisfied that the most appropriate way of proceeding is under the Competition Act 1998[50]; or

- The section 55 (5B) exceptions applies. This applies if we are satisfied that:

  - the licence holder has agreed to take, and is taking, all such steps as it appears to ORR for the time being appropriate to take for the purpose of securing or facilitating compliance with a condition; or

  - the contravention or apprehended contravention will not adversely affect the interests of users of railway services or lead to any increase in public expenditure,

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[48]   Section 55(2).

[49]   Section 55(5)(a).

[50]   Section 55(5A).

in which case, we will only make the final order if we consider it appropriate to do so.[51]

Whenever the statutory exceptions (except section 55(5B)) apply, we are precluded from making a final order. Under section 55(5B), we may still impose a final order even where the substantive elements of the exception are satisfied, "if [ORR] considers it appropriate to do so".

We cannot make an order if the breach happened in the past but is not on-going. We can however impose a penalty for a past breach.

If we decide not to make a final order, or not to make or confirm a provisional order in respect of a licence breach, because we consider that one of the statutory exceptions applies, we must, under section 55(6) of the Act, serve notice of that fact on the licence holder and publish the notice. Although the Act does not specifically require us to set out in the notice our reasons for making such a decision, we would, as a matter of policy, expect to do so.

Provisional orders

A provisional order is, in effect, an interim measure and may last for no more than three months unless it is confirmed. We must make a provisional order, without going through the procedural steps required for a final order, where it appears to us that it is requisite that a provisional order be made. In considering what is requisite, we must have regard, in particular, to the extent to which any person is likely to sustain loss or damage from the breach before a final order may be made.

The requirements for confirming a provisional order are substantially the same as for making a final order (see above).[52]

Penalties

ORR has the discretion to impose a penalty if it is "satisfied" that a licence condition was or is being contravened. This penalty cannot exceed 10% of a licensees' turnover.

The Act states that ORR must publish a statement of policy[53] in respect of the imposition of penalties. This statement can include provisions to be considered when deciding whether or not to impose a penalty. ORR must have regard to this statement of policy when deciding whether or not to impose a penalty.

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[51]   Section 55(5B).
[52]   Section 55(4).

[53] https://orr.gov.uk/__data/assets/pdf_file/0018/4716/economic-enforcement-statement.pdf

Alternative Remedies

Other Statutory Remedies

We have considered our powers under the Competition Act 1998 and are satisfied that these do not offer the most appropriate means of proceeding.

What our economic enforcement policy says

The purpose of enforcement is to ensure delivery and secure compliance with public interest obligations. The possibility of enforcement provides an assurance and acts as an incentive for the industry to deliver in accordance with the public interest. ORR will have regard to this policy when determining whether to pursue formal enforcement action or use alternative remedies.

The Principles of Enforcement

ORR's approach in deciding whether or not to use our formal enforcement powers in the Act is informed by best regulatory practice and the following principles:

Proportionality

We apply the principle of proportionality to all types of licence obligations. When considering whether or not to use our formal enforcement powers we assess the circumstances of each individual case. In general we take account of the following factors:

a) The significance of the failure, including whether it was a one-off incident or part of a systemic or sustained failure. We generally pursue enforcement action in instances where there is evidence of a sustained failure to meet licence obligations, rather than a one-off incident. For one-off incidents, we will generally only take action where it is in the public interest to do so, and where it is symptomatic of a systemic breach. We will also take into account the progress the licence holder has made to rectify the situation.

b) The extent to which the licence holder has a robust, adequately resourced plan to achieve compliance within a reasonable period of time

c) Whether enforcement action would encourage greater effort on the part of the licence holder to remedy the breach

d) Any persistent non-compliance

e) The effect on third parties and their potential right to compensation

Targeting

ORR generally uses its enforcement powers to resolve systemic issues that are not dealt with effectively in contractual relationships. These relationships include access contracts, the Network Code, the Station Code and Depot Code, as well as industry wide arrangements on ticketing. ORR will also focus upon enforcing licence obligations where there is a detrimental effect on passengers, freight customers, funders and other stakeholders.

Consistency

ORR aims to take a similar approach in similar circumstances to achieve similar ends. We apply the same principles in coming to a decision and ensure consistency in our approach to regulation of the industry.

Transparency

We ensure that the industry understands what is expected of it and what is expected of ORR. This report, setting out the evidence and our decision, will therefore be published.

Accountability

ORR is accountable to the public and our decision in respect of the overruns will be subject to scrutiny. ORR will consider any representations made to us about our approach to enforcement and use of our powers.