



ARRIVA

Arriva Trains Wales/
Trenau Arriva Cymru Limited
St. Mary's House
47 Penarth Road
Cardiff/Caerdydd
CF10 5DJ

www.arrivatrainswales.co.uk

Philip Wilcox
Office of Rail Regulation
1 Kemble Street
London
WC2B 4AN

02920 720668

15 October 2012

Dear Mr Wilcox

ORR's APPROACH TO TRANSPARENCY – A CONSULTATION

Thank you for inviting us to respond to the above consultation.

Arriva Trains Wales is supportive of the principles of transparency and openness when it is to the benefit of our customers and stakeholders and where there is an opportunity to build a relationship of improved trust. However, information can also be misinterpreted if it is presented in a way that is not clear to its audience or if inappropriate comparisons are made across organisations. There is already much information about rail business in the public domain and many KPIs are already widely publicised. We must be clear that increased transparency leads to more meaningful information being available that improves understanding of our organisations and improves the trust and understanding of our customers and stakeholders.

In your consultation, you have illustrated an example of how unique data can better inform the customer and assist in the choices made. Whilst we support this concept, it should be borne in mind that each TOC business profile is unique and a solution practiced by one is not necessarily transferrable or comparable to another. The data which may be presented in the public domain on one category across all TOCs will not necessarily reflect the true picture for the individual TOC and could lead to an uninformed measure or misinterpretation. In so far as the questions you have tabled in your consultation document, I respond as under:

National Rail Trends Portal (Question 1)

For ATW, I refer to our own sources of statistical information but, for the public domain, we believe the National Rail Trends Portal it is currently fit for purpose.

ORR's Own Processes (Question 2)

We are content with the current information which is available through the NRT Portal and the Annual Health and Safety Report but would wish to clarify how data on safety inspections etc. would be presented on comparative performance according to each Train Operating Company's profile.

Safety (Questions 3 and 4)

We would refer to our response on Question 2 and to clarify how information on best practice would be expressed in the public domain.

Network Rail Initiatives (Questions 5 and 6)

We believe we already have the requisite historical data on which to assess customer demand for our business. Our positive working relationship with Network Rail affords the means by which information is readily shared between the parties for mutual improvement.

The Sector – ORR and Industry Initiatives (Question 7)

We believe that ORR and the Industry are moving in the right direction but that perhaps the pace could be increased. We would however caution on the speed with which further transparency is developed and the potential for industry and public misinterpretation.

The Legal Framework (Question 8)

We have no particular views to express on this matter.

Accessibility and Data Integrity (Question 9)

We agree that there is a risk of widespread misinterpretation if data is presented and not supported with plain English commentary and an appropriate context.

Appraising the Cost and Benefits (Question 10, 11 and 12)

We believe we have our own examples where transparency has resulted in positive change, in particular through stakeholder engagement. There is a danger here however that, potentially, openness can lead to misunderstanding and subsequent reputational risk.

I hope that the comments we have provided will be of use in this consultation process.

Yours sincerely



Mike Bagshaw
Commercial Director