

# **ORR'S PURPOSE**

To protect the interests of rail and road users; improving the safety, value and performance of railways and roads, today and in the future.

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### **FOREWORD**

This business plan sets out our approach to support improvements in the areas that matter most to road and rail users and to funders.

The year ahead is a particularly important one as it is the start of a new control period for Network Rail. We will be focusing more closely than ever on the company's core commitments around train service performance, efficiency and the system operator function, while implementing our new policies on holding Network Rail to account. And we will be monitoring implementation of the changes Network Rail is planning to make to its organisational structure through its Putting Passengers First programme.

More broadly, we will complete the periodic review of High Speed 1 and continue our work with other infrastructure providers, such as potential third party investors.

We will build on the successful work to date with the industry and complete our plans to improve the travel assistance it provides to passengers who need it. We will continue our new cross industry initiative to improve the information provided to all passengers.

Alongside these areas of change, the UK Government's Rail Review provides an important opportunity to set the future direction of the rail industry. We are engaging positively with the Review and its chair Keith Williams. We will provide advice on how regulation can support different industry options and structures and we will publish the specific pieces of advice on accessibility and compensation which Keith Williams has asked us to provide.

2019/20 is also an important year for our work as Highways Monitor. We will provide independent expert advice to the Secretary of State on the efficiency that Highways England should be tasked with delivering in RIS2. This needs to strike the

right balance between being challenging but also deliverable, in order to deliver benefits to road users that can be achieved given the funds available.

But while 2019 will be a period of opportunity and change, we must also ensure that we keep focus on our day to day activities, on which the industry and passengers rely. This includes our crucial role to deliver a safer railway, as well as our work authorising new vehicles and infrastructure, oversight of track access, promoting competition and as a national statistics authority – to name but a few. These activities sometimes attract less attention, but without them the rail network could not operate effectively.

It will also be a busy year for us from a corporate perspective as we will be relocating our London office from Holborn to our new office in Canary Wharf from September. This move will enable us to stay close to the majority of our stakeholders, while not increasing our office costs. We also continue to have offices in Glasgow, Manchester, York, Birmingham and Bristol to ensure we have staff located across the country to provide the best possible service across all our responsibilities.



John Larkinson
ORR Chief Executive



## THE VALUE OF REGULATION

As a regulator, our role is to ensure our railways and roads are safe, reliable and good value for money. This brings benefits for everyone: passengers, funders, train companies, rail workers, road users and taxpayers.

At ORR our core purpose is to protect the interests of rail and road users, improving the safety, value and performance of railways and roads today and in the future.

We believe that a strong and independent regulator working effectively with industry and governments plays an essential role, ensuring that our transport networks support the economy and benefit society as a whole. The disruption following last May's railway timetable changes means that the whole industry must be focused on openness and rebuilding trust.

Effective regulation has a role in highlighting performance to ensure transparency, delivering the ability to compare different routes and providers in rail, therefore driving improvements. It also works to balance the potentially competing interests of those who use the networks, freight customers, governments, taxpayers and the general public fairly and efficiently.

Our functions are set out in legislation and we are accountable to Parliament and the public. We aim to drive improvement by **working collaboratively and constructively** across industry and with all stakeholders. At the same time we are clear in carrying out our legal duties and our responsibility to monitor and report transparently on performance, good or bad.

# **OUR STRATEGIC OBJECTIVES**





BETTER RAIL CUSTOMER SERVICE









# By striving for excellence and ensuring compliance with the law, ORR aims to secure a safe travelling and working environment on Britain's railways.

This year the rail industry must remain vigilant but also move forward. Our focus, as set out in our annual health and safety report, will be on three key challenges:

- Responding to increased pressure on the system from declining performance, introduction of new trains and ageing assets
- Managing the effective introduction of new technology whilst taking human interactions into account
- **Supporting our people**, who are often the last line of defence in preventing a major failure.

A priority for us continues to be the industry's response to the tragic incident in 2016 on **London Trams**. This year we have shifted our focus to operational delivery of the Rail Accident Investigation Branch's (RAIB) recommendations. Building on the progress the tramway sector made last year, we will continue to monitor how it is fulfilling its commitments, particularly opportunities presented by rapidly-developing driver assistance technologies. We will continue to support the Light Rail Safety and Standards Board, promoting leadership and GB-wide cooperation in developing risk control requirements. Our expanded team will begin delivery of our new strategy for regulation of health and safety risks on tramways.

Following scrutiny of **Network Rail's Business Plans for Control Period 6**, we will focus on ensuring that the devolved routes deliver sustained safe management of physical assets, workforce and passengers. We welcome the adoption of the **Risk Management Maturity Model (RM3)** by Network Rail's routes and will engage in constructive dialogue on our findings. We will continue to focus on Network Rail's assurance arrangements, believing that improving this area will promote better, more consistent management maturity and risk control. Each of our inspection teams will be examining the effectiveness of assurance activities at Maintenance Delivery Unit level.

When it comes to testing Network Rail's ability to prevent and mitigate precursors to **catastrophic risk**, we have selected the adequacy of drainage at higher risk assets such as tunnel portals and cuttings as the focus of a network-wide inspection programme. We will also examine topics related to track, structures, earthworks and electrical assets, continuing to inspect the safety and occupational health of track workers.

Our inspection plan also includes the standard of emergency planning by passenger train operators (such as risks for passengers evacuating stranded trains) and freight operators (such as dangerous goods incidents).

Train operators are introducing **many new fleets of trains** and our inspection activity will check that risks have been designed out, or seek reasonable remedial action. We are increasing our work on vehicle systems and acceptance processes through a dedicated new rolling stock role within our inspectorate.

Risk to passengers at the **platform-train interface**, particularly as the train moves away, will continue to be an area of work.

We will continue to work with the **freight** community to reduce the risk of derailments, supporting the increasingly effective industry working groups. Following several serious accidents involving young trespassers in recent years, we will test measures to prevent trespass in freight yards and stations.

We have monitored **Transport for London's** significant Transformation Programme over the year. With further changes likely, we will continue our engagement to ensure LUL's good safety record is maintained, with a particular focus on maintenance of assets.

We will continue to engage with the **Crossrail** project and maintain our strong commitment to ensuring that all regulatory requirements incumbent on ORR are met and discharged on time or ahead of time.

We are expanding our supervisory capability of **the heritage sector** and will begin implementing our risk-based supervisory programme to ensure that it is strengthening its safety management systems.

ORR also provides expert advice and secretariat support to the UK delegation of the Intergovernmental Commission (IGC) for the Channel Tunnel as well as to the **Channel Tunnel** Safety Authority (CTSA) and associated working groups. We will continue to ensure these functions are resourced to support bi-national regulation of the Tunnel through a period of change, including preparations for the UK's departure from the EU, revision of the legislation and the introduction of new equipment and rolling stock.

More generally, we will continue to seek improved implementation of **health and safety by design** as new strategic assets are introduced across the industry.

We will conclude our review of our policy and strategy on **crowding**, following the expected conclusion of new independent research.

We will continue with our statutory responsibilities for **safety certificates and authorisations** and continue to work closely with train and freight companies on licence matters now that the 31 October 2018 deadline to license all train drivers has been met and a new suite of supporting guidance documents has been published.

As ever, the management of **train driver competence**, **fitness and performance** is an important focus for us. A key aspect this year will be the recent rise in the number of Signals Passed at Danger (SPADs). We will focus on the revision of Railway Operations and Other Guided Systems (Safety) Regulations (ROGS) 2006 guidance and the introduction of human factors requirements within the Safety Management System. We will continue advising on the development of the digital railway, as well as publishing revised fatigue guidance and refreshing our capability in this important area.

Continuing our focus on **supporting our people**, ORR has made good progress on the important topic of occupational health, but there is more to do. Our own programme has now ended and the industry has accepted greater leadership, making headway with the Health & Wellbeing Roadmap. ORR will continue to monitor this, publishing a substantive review of health data that will inform an update of the Health Strategic Risk Chapter and our future activity. However, we continue to seek improvements in diesel fumes and silica dust by adopting a "healthy by design" approach. Inspectors will continue to look for improvements in health risk during site visits.

We strive to improve our **organisational capability**, continuously developing ORR's regulatory processes and effectiveness. This year, we plan to explore innovative ways of collecting and analysing wider data sources to inform our understanding of railway risk and better target our activities. We will provide training in High Integrity Software-based systems. Developing our staff and maintaining succession plans remains key.

Following **Brexit**, we will revise our guidance and processes as necessary and support the industry to manage its safety and driver licensing obligations through any legislative change, identifying opportunities for improvements. We will continue to engage internationally with other safety authorities, including developing new relationships where required.



In a period of rising passenger numbers and expectations, we have a key role in ensuring that rail companies understand their obligations and deliver improved service across the network.

We want the rail industry to put customers at the heart of what it does. Our consumer work therefore focuses on supporting passengers' interests, monitoring and, where necessary, enforcing consumer protection law to ensure compliance with both the conditions in Network Rail's and train operators' licences and consumer law.

We are committed to proactive engagement with industry and consumer stakeholders. We focus on collecting relevant data and evidence to provide a robust base for our consumer activities. Dedicated to transparency, we aim to give a balanced picture of performance, recognising industry achievements but taking enforcement action where necessary.

We will continue to test our consumer policy work and more broadly how we regulate in this area with our independent Consumer Expert Panel and other independent stakeholder groups, and will support our activities with consumer research.

The research and data we have collected on customer service has shown that significant

improvements need to be made, particularly in the area of Assisted Travel, and this has driven our priorities for 2019-20.

A priority will be to develop a **compliance and enforcement policy** specific to the key consumer protection obligations set out in operator licence conditions and in general consumer law.

We will continue to focus our research and policy work in the following specific areas: **information provision to passengers, accessibility, complaints handling and ticket retailing**.

On **passenger information**, we want operators to provide appropriate, accurate and timely information, so that passengers can plan and make journeys with reasonable assurance, including during disruption. Improvements to passenger information will therefore be a priority for ORR.

We will take forward the results of research into identifying good practice and potential shortfalls in information delivery across train operators and

Network Rail. We will work with industry to roll out an information maturity model across train operating companies and Network Rail, and develop a plan to focus on improvements. Last year we carried out enforcement investigations into the provision of passenger information in the lead up to, and following, the 20 May 2018 timetable change and we will continue to learn from and build on this in 2019-20.

On accessibility, our focus will be finalising our work to improve Assisted Travel. We will start to implement the results of our recent consultation to improve reliability, disability awareness, journey planning, training and information across the industry. We will publish new Disabled People's Protection Policies (DPPP) guidance and approve operators' policies against it. We will also undertake mystery shopping research, focussing this year on the provision of Assisted Travel information at stations and on information provision from station help points. Last year we stated that we expected all operators to be aware of the Secretary of State's Stations Code of Practice on Design Standards for Accessible Stations and this year we will undertake greater proactive monitoring of operators' compliance in implementing the Code.

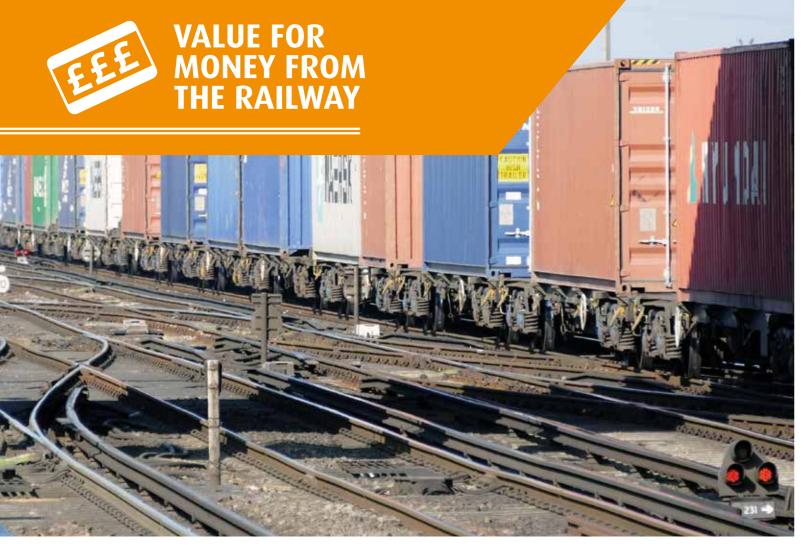
On **complaints handling**, a priority for ORR is to enhance our monitoring of Complaints Handling Procedures (CHP). We will use the results of comparative research on complaints handling in other regulated sectors with an ombudsman scheme to promote best practice and improvements to operators' processes. We will engage with the new Rail Ombudsman, building on work done on the changes to passenger and stations licences and CHPs during facilitation of the Ombudsman's introduction.

**On ticket retailing**, we will focus on improving the clarity of key consumer terms and conditions, building on the output of research, and promoting greater understanding amongst passengers of their rights (such as to compensation and refunds).

Our annual consumer report, 'Measuring Up', draws together all our work on customer service and will be published in July. It will set out industry performance across each of our consumer areas and present comparative performance data, along with detailed data on individual operators, as a positive way to drive change. The report will include case studies showing where regulatory intervention has delivered improvement for people's and will look ahead to the challenges and areas for improvement in the following regulatory year and beyond.



Following a request from Keith Williams, ORR will be contributing to the wide-ranging **Williams review** of the British rail industry. This is recognition of ORR's strong reputation in consumer issues, and specific expertise in the areas of accessibility and compensation. A project team has been set up to coordinate our response. We are currently developing an evidence-base, drawing on our knowledge of areas such as Disabled People's Protection Policies and Complaints Handling. We will use this, alongside engagement with rail stakeholders and comparators in other sectors and countries, to develop a problem statement and understanding of the scope for improvement. Following workshops with ORR staff and Board, we will develop policy proposals: options that can be implemented against different structural models, and in the short, medium and long-term. Our final report will be published by early summer.



We support the delivery of an efficient, high performing rail service that provides value for money for passengers, freight customers, governments and taxpayers.

ORR has an important role to play in holding Network Rail and HS1 to account for their performance, stewardship and enhancement of the network. We do this through **monitoring**, **public reporting and escalation**.

A key objective in 2019-20 is to drive improvements in Network Rail's train service performance (ie punctuality), efficiency and sustainability. This year we will take a new approach to holding Network Rail to account – we will, for the first time, use the new route-based system to make comparisons between routes across the country and will publish these in league tables. The new focus of our public reporting aims to highlight good practice and use reputational drivers to encourage improvement across Britain's network.

Following a consultation on additional tools at our disposal to drive positive change, we will be looking at the use of public hearings and requirements on companies for improvement plans. The last resort will continue to be formal action and fines where there is a breach of licence conditions.

To put these priorities into practice, we will **build**ORR's capability for 2019/20. Some internal structural adjustments will allow us to focus on system-wide risks and our activities will be supported with significant new resourcing: four new route posts to lead on monitoring, escalation and public reporting; two additional asset management posts to enable more direct contact with route specialists; a performance specialist post to provide technical support; and a post to project manage investigations, hearings and the managing change process.

When it comes to Network Rail's future delivery plans, the Final Determination on the Periodic Review 2018 (PR18) was made in October last year and this year we will work to embed PR18 and support **Control Period 6 (CP6)** which started on 1 April 2019, developing a long term approach to monitoring and reporting and including cost analysis through route benchmarking. We will develop an approach to the regulation of High Speed 2 (HS2) which will require coordinated activities across the whole of ORR.



ORR monitors **HS1** Ltd's delivery of its plans for their current control period (CP2, 2015-20), publishing a full annual report on the company in July each year. This year is an important year as we conclude our Periodic Review of HS12019 (PR19).

ORR launched PR19 in January 2018. Since then, it has worked with the company and its stakeholders to understand HS1's plans for Control Period 3 (2020-25), which will be published in April 2020. This includes plans for the regulatory framework, the structure of charges and the level of regulated access charges, and has allowed ORR to progressively assure the development of HS1's future approach to asset management.

Following the submission of HS1's draft Five Year Asset Management Statement at the end of February 2019, we will continue to work with HS1 and associated stakeholders until this is finalised in May. ORR will then publish its Draft Determination on HS1's plans, for consultation, followed by a Final Determination in January 2020.

Our role as a **competition** authority is central to achieving value for money. This year we will continue our structured market review programme, with a

pipeline of market studies in development. This complements our work in exercising our competition law enforcement powers and our regulatory tools.

Priorities for 2019-20 include: Open Access Operator monitoring and potentially wider open access work; a final review of commitments following ORR's Freightliner investigation and any required followup; a response to the review of concurrency by the Department for Business, Energy and Industrial Strategy; and casework under the Competition Act 1998. We will also be aiming to share information on our competition work more widely with stakeholders and increase its external profile through, for example, speaking engagements.

ORR will continue our role on **hearing appeals** from the industry brought under Part M of the Network Code, against determinations made by the Access Disputes Committee. Last year, we determined appeals brought by GB Railfreight and DB Cargo, with the final part of GB Railfreight's appeal due to be determined shortly. We also continue to determine appeals brought under the Access & Management Regulations 2016, although none were brought last year.

Our business as usual work on **track and station licensing** will continue throughout 2019-20, providing a core service to the industry. Last year we worked on over 300 access and licensing applications and this year we will take the same approach in running an efficient and effective process.

A number of changes are being introduced for open access operators from 1 April 2019. New operators that run certain services will pay additional track access charges. At the same time, we are making changes to our access policy that mean these services will benefit from greater access to the network. We are also changing the way we assess applications in response to new legislation. We will work closely with open access operators and industry as these changes take effect. Last year we developed a framework for monitoring the impact of, and response to, open access, in order to ensure that these operators are able to prosper and grow their businesses, while producing sustainable benefits for passengers. We will be implementing this framework this year and it should ensure that open access operators enjoy fair market conditions. It will also act as an early warning system, enabling us to be a more proactive competition regulator.

ORR has monitored preparedness across the industry, including the System Operator (SO), for the December 2018, May 2019 and December 2019 timetable changes. This has included regular engagement with Network Rail at a senior and working level, and monitoring and reporting against the immediate actions set out in the timetabling investigation letter to Network Rail of 27 July 2018. We also issued a Final Order to Network Rail in January 2018 setting out four requirements to improve the timetabling process. Network Rail delivered its report on these actions on 1 April 2019 as required. In addition, in CP6 the SO has committed to produce scorecards and publish an annual narrative report in CP6 to explain its performance and reflect on the quality of its service and areas for improvement. As part of the Final Order, we have required Network Rail to incorporate reporting on leading indicators on SO timetabling capability and resource into this reporting as well as on progress on strengthening timetable technology capability, with reference in particular to the £60m programme of improvement works set out within the CP6 Final Determination, by 1 April 2019.

We will continue to look at opportunities around **third party investment** in our railways and will work with those seeking to invest. We offer expert advice on safety, access, charging and legal issues, and will publish supporting materials and FAQs as well as reviewing aspects of the investment framework. We will also be working on the regulatory aspects of the transfer of the Core Valley Lines in Wales from Network Rail to Keolis Amey, which formed part of the Welsh franchise awarded by the Welsh government in 2018.

Information and analysis remains an important and highly valued function of ORR. We will continue to publish a range of statistics about railway performance, rail usage and safety – to support performance evaluation, analysis and decision-making for the railway industry. We will listen to our users to ensure that the range of statistical products that we produce continues to reflect their needs. For those with a general interest in rail, we will publish statistical releases that provide commentary and interpretation on trends across a variety of rail-related themes. For those interested in more detail, data will continue to be published on our data portal.

We are confident that ORR is prepared for the impact of **Brexit** on our activities and that this is manageable under foreseeable scenarios. We have been supporting the industry to understand how the UK leaving the EU affects their businesses, especially where these involve cross-border services or supply chains, and to plan mitigations to risks that may arise. We have also advised government on their development of legislation to bring European competences into UK law, and ensure a stable regulatory environment after Brexit. We will continue to provide advice and support over the coming year. We will also be doing further work on Eurotunnel's accounting separation and charges.

On other non-Network Rail regulation we will continue our work on Crossrail to finalise access arrangements.

Our work on Northern Ireland's economic regulation also continues, covering terms of access and charges and accounting separation requirements, all the while ensuring a proportionate approach given the relative size of Northern Ireland's railways.





We have a vital role in monitoring Highways England's performance, to make sure that its customers – those using England's strategic road network – enjoy predictable journeys on England's safe, good quality roads.

Our approach remains similar to regulating rail – we monitor against metrics, gather data and publish reports to provide impartial commentary on Highways England's performance. This year, we plan to make more of those synergies by **sharing our expertise across the sectors** – whilst continuing to apply scrutiny in both.

Over the past year, we published our third annual assessment of Highways England's performance and our benchmarking update report. We also carried out work to advise government on its emerging priorities for the next road investment strategy (RIS2) and worked with Highways England to understand its plans for improving its management of assets and performance outcomes.

In doing so, we continue to work closely with Highways England and the Department for Transport, so that we target our work in the right places.

As we enter our fifth year of monitoring, our focus will be on two priority areas: continued monitoring of Highways England's performance over the first road

period (RP1, from 2015 to 2020) and work to **inform RIS2**, which covers the next road period (RP2, from 2020 to 2025).

In 2019-20, we expect to target our **monitoring** work to where performance on the strategic road network appears most challenging. For example, we will review the measures that Highways England is taking to improve road user satisfaction and safety. We will also continue to monitor how it is improving the maintenance and renewal of the network.

We will hold Highways England to account and where we identify issues we will consider the need for escalation. Building visibility and credibility with wider stakeholders, particularly Highways England's supply chain, will be important for our success.

We plan to place greater emphasis on monitoring the company's performance across the first five-year road period – particularly in areas where targets were set for the end of that period. We want to ensure that evidence to support efficiency reporting continues to improve, with better quality, and more accurate



understanding of costs and outputs. This will support our monitoring of efficiency over the long-term.

And it is important that we and Highways England closely track delivery of its major schemes over the coming year. Changes to its plans in this area can have significant impact on its delivery in the first road period, and also its proposals for the next one.

This year is a critical one for work on **RIS2**. We have an essential role in providing independent expert advice to the Secretary of State for Transport on the performance and investment that Highways England will be tasked with delivering in RIS2.

Early this year, we will be carrying out a detailed review of Highways England's plans for RP2. We will assess whether its plans strike the right balance between being challenging but also deliverable, including its plans for becoming more efficient. In summer 2019 we will set out our findings in our Efficiency Review.

Over the coming year, we will make further progress in our cost and performance benchmarking studies. This will support our Efficiency Review and also inform our longer-term benchmarking programme. We will publish our next benchmarking report in winter 2019.

Finally, as we approach the next road period, we will be carrying out work to prepare for implementing RIS2. We will continue to work collaboratively with the Department for Transport, Highways England and Transport Focus to support delivery of commitments. We will review our approach to monitoring for RIS2, including the impact of any changes to Highways England's licence.

Internally, we will continue to create a more joined-up approach. We will explore how integrating our road and rail regulatory activities can build our capabilities and improve our effectiveness across the board, while maintaining an essential level of scrutiny. This will also improve our staff's career opportunities and workforce retention, ensuring ORR is equipped with the skills and talent it needs for the regulatory challenges of the future.



# RUNNING ORR

In the interests of all stakeholders, we have a responsibility to carry out our regulatory duties effectively, transparently and in a way that provides best value for money.

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In the coming year, our **commitment to transparency** will continue to drive improvements in the quality of our data releases, will promote greater access to our data and reports and their use, and will demonstrate the benefits of openness across the rail and road industries.

We are also a **listening regulator** and continue to consult widely on our plans and intentions, also increasing our face-to-face engagement. We have an expanding **regional** presence among our staff, all the way up to the leadership of the organisation.

Our **income** streams relate to our three main lines of business: railway health and safety regulation, railway economic regulation and the monitoring of the strategic road network. There is no potential for cross-subsidy between these three funding streams.

On the rail side, we receive income from the rail industry to fund our core work, with health and safety regulation and economic regulation accounting for 51% and 42% of our annual income respectively. Our monitoring of the strategic road network is funded in the form of a direct grant from the Department for Transport and provides around 7% of the budget.

In 2019-20 although our core rail budget will remain the same as last year in real terms, employer pension contributions are increasing from 1 April 2019, which will cost an extra £1.0m in 2019-20. This means that we will raise £31.9 million in statutory charges, plus a one-off charge of around £2.0m for the move to our new London office in the autumn (see below). Our roads budget from the DfT will be slightly lower this year at £2.4 million (a £50,000 reduction).

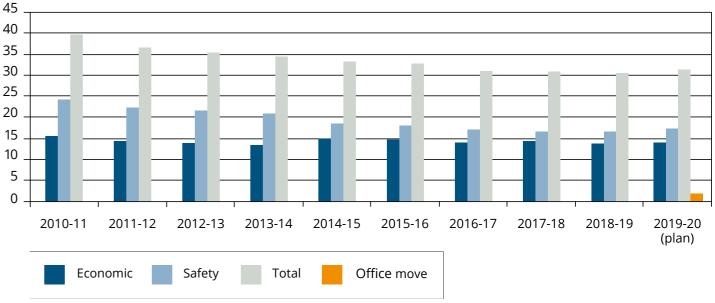
ORR is an organisation built around its people, so the majority of our **expenditure** is on staff costs and the overheads that are necessary for them to carry out their work, such as building maintenance and IT. We have a good track record of delivering **year-on-year** cost efficiencies in our core expenditure and have made savings in real terms of around **24%** since 2010-11.

We will achieve our budget by cost efficient management in line with the Civil Service, of which we are part. We are already benefiting significantly from **our IT transformation programme** and bringing IT services in-house, which has saved us around £500,000 annually compared to the previous outsourced arrangement.

The current lease on our London office comes to an end in December 2019, and we will relocate to Canary Wharf in the autumn. Annual running costs for the new office are expected to be similar to our current building, but in 2019-20 we expect to incur around £2.0m of additional operating costs for the office move, which will be charged to our funders.



#### Maximum statutory charges to rail industry (£m) 2018-19 prices using RPI





## **SERVICE STANDARDS FOR 2019-20**

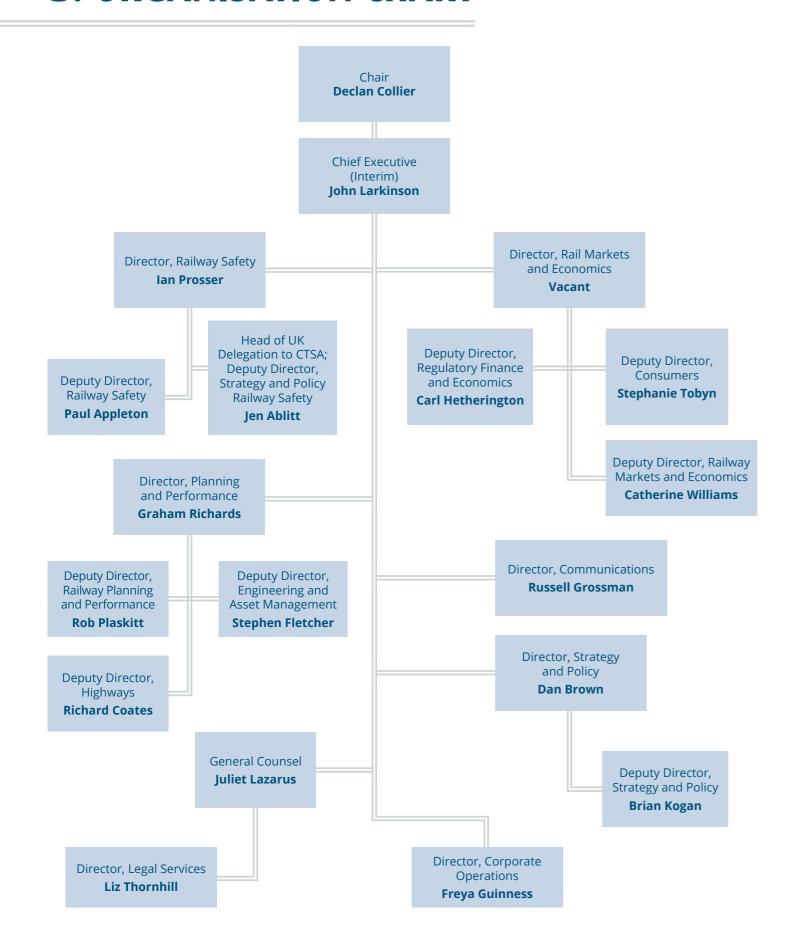
Much of ORR's 'business as usual' involves providing services to those in the industry or others with an interest in our work. As an organisation that is largely funded, directly or indirectly, by the public it is essential that we publish service standards as part of our commitment to transparency.

#### Progress against the Business Plan – service standards

Provision	Standard	Performance outturn to Q3 2018/19
Issue new or revised train driver licences	100% of applications processed within one month of receipt of all necessary documentation	100%
ROGS safety certificates and authorisations	100% determined within four months of receiving completed application	96%
Report to Rail Accident Investigation Branch (RAIB) on the progress of recommendations	100% response to RAIB recommendations within 1 year of associated RAIB report being published	100%
Efficient processing of technical authorisations	100% of responses within 28 days of receiving complete submission	100%
Access and licensing casework	100% decided within 2 months of receipt of all relevant information	100%
Freedom of Information requests	90% of requests for information responded to within 20 working days of receipt	95%
General complaints and enquiries	95% of enquiries and complaints responded to within 20 working days of receipt	94%
Prompt payment of suppliers' invoices to ORR	80% paid within 10 days of valid invoice 100% paid within 30 days of valid invoice	95% 100%
We will target at least hal with Network Rail and ot	50%	

Performance against service standards is measured quarterly as well as cumulatively.

## **B: ORGANISATION CHART**



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