Feras Alshaker
Director, Planning & Performance
Office of Rail and Road

Paul McMahon
Director, Planning & Regulation
Network Rail Infrastructure Ltd

Sent by email

13 February 2024

Dear Feras

Data quality compliance

Thank you for your letter dated 18 December 2023 in which you raised concerns about the quality of data Network Rail supplies to ORR. I am writing to address the issues raised in that letter and provide a high-level summary of our plan, setting out what we are doing to improve the quality of data we provide to you.

Issues raised

As you observed, Network Rail provides ORR with a large amount of data. This data covers a wide range of activities, is derived from multiple sources and collated by numerous individuals. Occasionally, things can go wrong – for example, errors in spreadsheet formulas, different interpretations of what is required; or mistakes when manually inputted numbers. However, we accept that the level of errors is a concern and that we need to take further action to address this.

Our plan

Over the past six months, we have been working on a plan to improve the quality and consistency of data assurance. We are setting up a Data Assurance Framework to provide consistent guidance and tools to data providers, and to provide an additional layer of assurance. We have recently shared the details of our plan to improve the quality of data that we provide to you with members of your team for comment. In summary, we intend to undertake several improvement activities with a phased implementation to deliver the various initiatives. The key high-level steps of our plan are as follows:

	Activity	Target date
1	Work with Network Rail steering and working groups, to finalise and endorse the Data Assurance: Best Practice Guide, with support provided by ORR.	March 2024
2	Provide appropriate training on the Best Practice Guide to data providers and setup data quality monitoring process.	April 2024

3	Provide second-level assurance to data providers for Tier 1 success measures as detailed in the Data Protocol.	Q1 2024/25
4	Apply Best Practice Guide to 2024 Annual Return and Regulatory Data Projects during the financial year 2024/25.	Q1 2024/25
5	Provide second-level assurance to data providers for Tier 2 supporting measures, and Tier 3 measures including supplementary data requests as and when agreed.	Q2 and Q3 2024/25
6	Review application of Best Practice Guide to the Data Protocol, 2024 Annual Return and Regulatory Data Projects, and apply lessons learnt to Regulatory Reporting data submissions for the financial year 2025/26.	Q3 and Q4 2024/25

Governance and accountability

We have set up an internal steering group and working group and have shared the responsibilities of these groups with you. The steering group has representatives from each region and key functions, and will oversee the implementation of the Data Assurance Framework. It will be chaired by the Director, Planning & Regulation, and have overall accountability for the quality of regulatory data. The working group consists of data providers and data systems owners, and will support the implementation and embedding of the Data Assurance Framework.

We propose that progress against this plan is jointly monitored by Network Rail and ORR, predominantly through the existing Data Protocol forum.

Summary

We recognise the importance of accurate data, and the obligation on us to provide this. We believe that by implementing the steps set out in this letter, and the details that we've shared with your team, we will reduce the risk and frequency of data errors and provide robust quality assurance. We look forward to working closely with you and your team on the implementation of our improvement plan.

If you require any more information, please do not hesitate to contact me.

Yours sincerely

Paul McMahon
Director, Planning & Regulation