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Dear Michael,

Network Rail Year 2 CP7 Stakeholder Engagement review

Thank you for providing Network Rail's Year 2 report on the quality of its stakeholder engagement, covering the period from March 2025 to April 2026. ORR's assessment has been informed by your report and by other relevant information available to us during this period.

In our [year 1 assessment](#), we identified areas where Network Rail could strengthen its evidence of the quality of engagement. These included providing clearer evidence of outcomes and impact, making better use of stakeholder feedback, demonstrating governance and assurance arrangements more clearly, and sharing good practice more consistently across the organisation.

Year 2 CP7 assessment

Overall, our year 2 review indicates that Network Rail has a systematic and coordinated approach to stakeholder engagement across the organisation, consistent with the principles set out in its network licence condition. We did not identify any material concerns through our review. As previously noted, Network Rail must continue to demonstrate consistent delivery of these principles across all its engagement activity, supported by ongoing development, training and continuous improvement.

Network Rail continues to demonstrate a strong commitment to inclusive stakeholder engagement, with evidence of activity across a broad range of stakeholder groups and business areas, including rail reform. We observed formal governance and assurance arrangements supporting this activity, as well as evidence that engagement is informing decision-making and delivery across the organisation.

However, while Network Rail remains clearly committed to keeping stakeholders informed, the evidence was less consistent in showing how stakeholder feedback has influenced decisions and outcomes.

We found evidence of progress against the expectations set last year, including:

- more structured and consistent arrangements for assessing, assuring and improving stakeholder engagement across the organisation, supported by an internal metric that scores business unit activity against a stakeholder engagement assessment framework;
- stakeholder engagement activity being delivered across a broad range of stakeholder groups and business areas. An example includes Scotland's Accessibility Forum, which incorporates feedback from disabled passengers into decision-making, and engagement with suppliers, freight operators, elected representatives and local communities across a range of Network Rail activities;
- more established governance and assurance arrangements to oversee stakeholder engagement activity. For example, NW&C demonstrated a structured approach, with tiered stakeholders, regular engagement and proactive communications guided by a defined strategy;
- greater sharing of learning and good practice across the organisation; and
- evidence that stakeholder engagement is increasingly informing decisions and delivery. For example, Southern's use of passenger feedback from station surveys to inform improvements to seating and toilet facilities at major London terminals.

Network Rail has demonstrated a mature and evolving approach to stakeholder engagement. Further refinement of its stakeholder engagement assessment framework, continued sharing of good practice to improve organisational learning, and more consistent demonstration of the outcomes and impacts of stakeholder engagement activities across the organisation will help strengthen existing good practice. This should enable the organisation to improve continuously and build on the outcomes already being delivered.

As the rail industry continues to prepare for significant reform and the transition to Great British Railways (GBR), Network Rail's role in actively engaging stakeholders on rail reform remains particularly important. There is evidence that this engagement is generally inclusive and supported by appropriate governance arrangements. While recognising the sensitivities and careful handling required for reform-related activity, there may be opportunities to enhance the visibility of ongoing activity, recognising that some activity will necessarily remain subject to development or further consideration.

Yours sincerely



Stephanie Tobyn