Annual report and accounts 2024 to 2025

Performance report: Performance analysis

The performance analysis section provides a more detailed analysis of how we have performed against the strategic objectives and deliverables set out in our business plan for 2024-25.

Future plans

In our deliverables for 2025-26, we have committed to the following priorities:

- monitoring Network Rail's CP7 Delivery Plan commitments, including delivery of safe and reliable assets;
- inspections on worker fatigue risk management;
- a targeted inspection initiative on level crossing safety;
- training for ORR inspectors to improve digital safety capability;
- working with DfT to implement the minimum age change for train drivers and secure wider reform of the train driving licensing regime;
- consulting with industry as part of ROGS statutory review;
- reporting on civil assets management by London Underground;
- delivering joint ORR/Heritage Association safety workshops; and
- reporting on the implementation of recommendations from our costs and benefits of safety report.

Strategic objective 1: A safer railway

ORR is the health and safety regulator for all of Britain's rail industry. Our strategic objective is to enforce the law and ensure that the industry delivers continuous improvement in the health and

safety of passengers, the workforce and public, by achieving excellence in health and safety culture, management and risk control.

In July 2024 we published our annual report of health and safety on Britain's railways. These continue to be amongst the safest in the world, but we cautioned against complacency, given the significant challenges the industry faces.

Network Rail and mainline operators

In 2024-25 we remained focused on supporting Great Britain's railways to run safely through a period of considerable change. New dedicated internal resource allowed greater integration between health and safety and economics colleagues to progress the safety aspects of Network Rail's delivery plan for control period 7 (CP7).

The challenges of the funding settlement are resulting in fewer asset renewals and an increasing reliance on maintenance and refurbishment. We examined Network Rail's approach to maintaining the safety of its assets and realising the benefits of its 'modernising maintenance' programme. We delivered a strategic, structured and targeted intervention programme, concluding in early 2025-26.

We worked cross-departmentally to address concerns about Network Rail's ability to manage both the safety and performance of its structural assets, to ensure legal compliance and timely, well-informed decisions that maintain asset life and performance.

We continued to support the government on its proposals for rail reform and the creation of Great British Railways (GBR). The first train operators to return to public ownership have submitted applications to ORR for safety authorisation, as required by the Railways and Other Guided Transport System (Safety) Regulations 2006 (ROGS). We have a programme in place to complete the timely assessment of these and further applications as they arrive.

During the year we contributed to the Rail Resilience Strategy Development Group (RRSDG) and its vision of a resilient railway that is better able to detect, prevent and manage current and future threats – such as climate change, extreme weather, major power outages, and engineering integrity. We will work with RRSDG to progress an agreed action plan.

Extreme weather events in particular, and their impact on buildings and structures management, have continued to be a significant issue for the industry. As part of our multi-year strategic

intervention programme, we undertook several observations of regional extreme weather preparation meetings in the run-up to named storms and warnings. This allowed us to assess whether Network Rail's current standard had been met and is sufficient to achieve the level of control required. We completed this year's interventions by carrying out regional assurance audits of Network Rail's arrangements, with the aim of developing a national picture of compliance within the requirements of health and safety law. Further work will inform a consolidated report in 2026.

In May we commenced discussions between track and train duty holders on their approach to protecting passengers during stranded train events, following a number of high-profile incidents in 2024. Further details on this work can be found in the 'better rail customer service' section.

We welcomed efforts by industry this year to collaborate on risk management maturity model (RM3) assessments and action plans. Through our membership of industry groups, we worked with train operating companies and Network Rail on areas such as risks to passengers at the platform-train interface (PTI), participating in regular cross-sector workshops.

Our strategic liaison with the Freight Safe Working Group has focussed on embedding RM3 industry self-evaluation of management systems. The need to make significant improvements in welfare provision (for example, for lone freight drivers working out-of-hours) has been recognised and a workstream is being developed for a more coordinated industry approach. Our inspection visits to freight yards and depots have prioritised ensuring adequate welfare provision.

Fatigue in railway staff is a causal factor in rail incidents and failure to manage this properly can have catastrophic consequences. Following a consultation, our updated managing rail staff fatigue guidance was published in August. We hosted an event with stakeholders to discuss how to work with the guidance and better manage fatigue risk. Interventions planned in 2025-26 will determine industry's awareness of the guidance and how it has helped.

The occupational health, safety and wellbeing of railway workers has remained a priority this year. We have continued our focus on the health impacts of exposure to welding fumes and our interventions have allowed us to gather insights on Network Rail's progress in controlling these risks. Inspections next year will assess compliance with the use of appropriate risk controls and our findings will be used to generate specific region and route reports, informing a national overview.

We continued to provide input on industry policy, legislation and guidance as it relates to health and safety on the railways. Throughout the year we worked closely with DfT on the proposed

policy to lower the minimum age for licensed train drivers from 20 to 18 years, supporting the government's consultation and management of responses, and providing advice on how we would expect industry to prepare for this change. We will work with DfT to introduce the necessary legislation and with the sector to review implementation plans.

We have been influential in gaining ministerial commitment to resume work with DfT to explore potential wider legislative reforms of the train driving licensing regime, following our post implementation review of the Train Driving Licences and Certificates Regulations 2010. This work will roll into the next business year, when we will re-engage with stakeholders to develop firm policy proposals for consultation.

We refreshed our health and safety crowding position statement which sets out our public position on crowding on trains and at stations, and our expectations of operators and passengers. Whilst we did not identify any significant new research that would fundamentally alter the current statement, we took the opportunity to improve the language and presentation to allow everyone to locate relevant messages more easily.

New technologies and innovative approaches are being brought in across the industry. Throughout the year, as well as investing in our own expertise, we have continued to engage with stakeholders, including Network Rail and train operating companies, to understand how digital safety risks are being managed.

We presented at CyberSenate and a fleet cyber security conference on the need to manage digital safety risks through a complementary safety management system approach. As part of the UK health and safety regulators network, we have led an AI sub-group looking at how AI can be embraced as part of regulatory practice, and how we regulate AI itself. We have also engaged with the Light Rail Safety and Standards Board on their cyber security project for the sector. We have had regular engagement with DfT, the National Cyber Security Centre and Rail Safety and Standards Board (RSSB) on the topic of cyber security and the application of new digital technology. Work will continue into 2025-26, as we build capability.

Non-mainline operators

A key achievement this year has been our work with Transport for London on asset management and management of change risk. We collaborated to understand the key safety challenges and risk control arrangements it has in place for the roll-out of London Underground's hugely ambitious four lines modernisation (4LM) project. Using expert support, we evaluated its approach and

recommended actions to consider ahead of further progress of the project.

We have held the tramway sector to account for delivery of health and safety improvements, with a focus on how operators are managing the risk of collision between tram vehicles, other vehicles and vulnerable road users, through the use of effective management systems.

Supporting health and safety leadership across the heritage sector has also been a key area of work. In January and February, we delivered six, one-day, workshops in collaboration with the Heritage Railway Association, at venues around the country. The events were successful in driving collaboration, exploring key issues and sharing the health and safety message more widely, and feedback has been positive.

Across the non-mainline sector we focused on asbestos exposure risks and will continue to support 'duty to manage' compliance checks throughout the coming year.

We have continued to engage with Strathclyde Partnership for Transport on the long-term modernisation project on the Glasgow Subway system, with a focus on the safe management of change. During 2024-2025 a step change was achieved as a fleet of new trains was successfully placed in service completely replacing stock ordered in the 1970s, and further work was undertaken to modernise and improve station safety. Our intervention work in this area is part of a multi-year engagement around significant changes to fleet, signalling and station safety arrangements as the system moves towards potential driverless operation.

We completed work with colleagues across ORR to support the successful introduction of the new 555 fleet on the Tyne and Wear Metro and will continue to monitor health and safety related arrangements as the implementation continues. We also conducted interventions focused on Nexus's asset management system and PTI risk management arrangements during the year.

Channel Tunnel

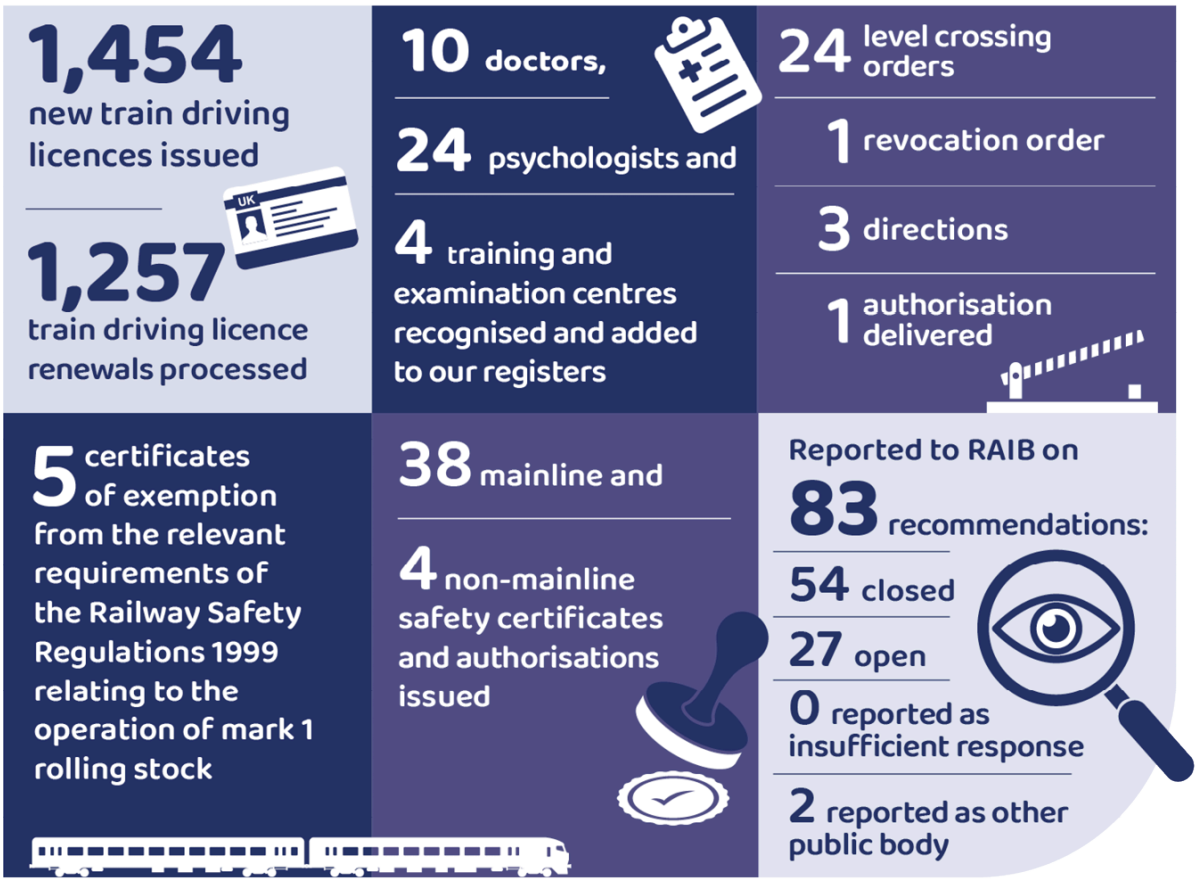
The timescales for implementation of new Channel Tunnel bi-national regulatory arrangements remain subject to UK parliamentary processes and therefore National Safety Authority (NSA) responsibilities for the UK half of the tunnel have not yet been transferred to ORR. Nevertheless, we have been proactive in providing input into the drafting of the technical framework agreement.

Workshops were held in December 2024 and January 2025 with tunnel duty holders to help facilitate a smooth and effective transition through understanding the implications of the

changes. We have continued to build positive relations with our colleagues at the French railway national safety authority, Établissement Public de Sécurité Ferroviaire (EPSF) following the establishment of the NSA sub-group last year.

Regulation and certification

We grant a range of health and safety permissions and approvals, and in some cases, we have statutory deadlines to meet. This work helps provide an effective framework for railway safety and, in the case of train drivers, establishes a common regime for licensing. This year there has been a very high volume of train driver licensing work to process in relation to both new and renewed licences. We met all of our service standards for the year.



Investigation and enforcement

Prohibition notices stop activities that pose a risk of serious personal injury and improvement notices identify serious breaches of the law that require changes to be made. During the year we

issued four improvement notices and no prohibition notices.

Where appropriate we prosecuted duty holders in the courts to ensure compliance with the law. We successfully concluded a number of prosecutions under the Health and Safety at Work etc. Act 1974.

In September, Severn Valley Railway (Holdings) PLC was fined £40,000 following an incident in 2021 in which a locomotive and carriage painter suffered neck and back injuries after falling 13 feet onto a concrete floor. The worker was working alone and was not wearing a safety harness. Our investigation found that the company had failed to put in place industry standard measures for working at height, and had not provided safe systems of work, instruction, planning or supervision.

In February, Network Rail Infrastructure Limited was fined £3.75 million after two track workers were fatally injured from being struck by a train at Margam East Junction in 2019, and a third narrowly avoided death or serious injury. ORR's investigation found systematic and wide-ranging safety failures by Network Rail in its measures to protect those working on or near the line. We subsequently served Network Rail two improvement notices, requiring it to implement preventive and protective measures.

Network Rail also pleaded guilty in February to breaching health and safety legislation following an incident in Surbiton in 2021, in which a track worker working in a four-person group was fatally injured after being struck by a train. ORR's investigation identified failings with the planning, monitoring and supervision of the work to ensure the workers were adequately protected and the company was fined £3.41 million.

Following learnings from the Margam and Surbiton prosecutions and Network Rail's compliance with ORR improvement notices in 2022, track worker safety near misses have reduced significantly in recent years from 65 per year to around 25 per year. We have continued to engage with Network Rail to ensure it embeds the commitments made in its CP7 track worker safety strategy and will monitor progress in 2025-26.

Another significant piece of work this year has been supporting the fatal accident inquiry to examine the full circumstances surrounding the tragic deaths of three people (two railway staff and one passenger) from the derailment of a train at Carmont, Aberdeenshire, in 2020. We continue to attend the preliminary hearings, in preparation for the final hearing expected later in 2025.

We provided evidence to the fatal accident inquiry into the death of a pedestrian at Saughton tram crossing in Edinburgh in 2018, working closely with the Crown and other parties.

We also supported the multi-agency investigation following the train collision incident at Talerddig, Powys, in October, when two Transport for Wales passenger services collided on the Cambrian line. One passenger died, four other people were seriously injured and eleven more sustained injuries requiring hospital treatment. Our investigation is ongoing.

We have continued to develop our internal systems and processes to improve management oversight, efficiency, consistency and delivery. Our new case management system helps to standardise information, processes and milestones so that everyone involved has easy access to data – from initial inspections through to investigations and prosecutions. The inspection app provides a digitised system for recording our inspection activity, tracking progress and extracting intelligence.

Our performance against 2024-25 business plan deliverables

2024-25 Commitment	Status
Convene an event to bring together senior leaders from track and train dutyholders to engage in the industry's rail resilience capability	Met
Deliver a strategic, structured and targeted intervention programme on Network Rail's approach to maintaining the safety of assets, specifically focused on maintenance delivery activities (including 'modernising maintenance')	Met
Work with DfT to secure legislative changes following the Post Implementation Review of the Train Driving Licences and Certificates Regulations 2010.	Delayed [note 1]

2024-25 Commitment	Status
Deliver a strategic, structured and targeted intervention programme to assess the adequacy of industry's risk management arrangements for operating during extreme weather	Met
Secure transfer to ORR of National Safety Authority (NSA) responsibilities for the UK half of the Channel Tunnel	Delayed [note 2]
Review and influence industry's new Platform Train Interface strategy	Met
Undertake a focused inspection programme to look at rail workers' welding fumes exposure	Met
Develop and deliver face-to-face engagement activities to drive improvements in health and safety risk management across the heritage sector.	Met
Review outputs from the rail resilience capability event to develop future areas of work	Met

Note 1: We continue to work with DfT on legislative changes for the Train Driver Licences Regulations 2010 which are expected to be made later in the year.

Note 2: The transfer of NSA responsibilities to ORR is dependent on DfT's timetable.

Strategic objective 2: Better rail customer service

We have a key role to improve the rail passenger experience and take prompt and effective action to improve the service that passengers receive where it is required.

In fulfilling this key role, we focus on the four areas where we have regulatory responsibility and where we have built enhanced capability:

- The provision of assistance to passengers who depend on additional support to make their journey.
- The provision of passenger information, including when there is disruption, so that passengers can make informed choices.
- The provision of a complaints handling service, awareness of the compensation process where passengers are subject to delay, and independent resolution through an ombudsman where necessary.
- Ticket retailing, specifically the ease with which passengers can purchase tickets and, where necessary, receive a refund for their ticket.

Our Consumer Expert Panel has continued to provide independent advice and challenge and given us an important consumer perspective to our policy and regulatory decisions, which has helped keep our focus on passengers.

We do this work alongside how we hold Network Rail to account for the quality of the rail infrastructure, which is a contributor to train performance, to ensure a joined up approach. We also provide transparency through publication of key statistics.

Another large area of our work to ensure better customer rail service on the railway is our regulation of access to the network for passenger services and freight companies.

Passenger accessibility

Work continued this year on our priority area of accessibility to the rail network and services for all passengers, and particularly those with disabilities.

In November we carried out a review of station operators' processes for maintaining and operating help points at stations, which provide an important backup for passengers seeking journey information, assistance, or a way to report emergencies. Data on help points at more than

2,500 stations in Britain revealed that customers cannot consistently rely on these to request assistance. We recommended that operators review and improve their management and monitoring of help point availability, with regular inspection, maintenance and a better understanding of usage. We also recommended risk assessments for unstaffed and partially staffed stations on their network.

In December we unveiled plans to develop a new benchmarking process to rate how well train companies provide assistance to disabled passengers. We know from passenger feedback that when assistance is delivered it is usually done well, but when it fails it has a significant impact. Our new assessment, developed through engagement with disabled people's organisations, intends to strengthen our ability to hold operators to account for poor performance, highlight good practice to share across the industry, and drive improvements in the provision of this important service. Based on the outcome of our consultation on the proposals, the rating will launch in 2025.

We have started to publish biannual statistics on the performance of lifts at stations, the majority of which are managed by Network Rail. We expect Network Rail to deliver improved performance, which the company recognises, and it has shared an improvement plan, progress on which we will continue to monitor closely.

This year we had intended to consult on proposals to require operators to take passenger views into account when considering staffing changes that might affect how disabled passengers are supported. We have paused this project and are engaging with operators under current requirements in the accessible travel policy guidance.

Passenger information and ticketing

We continued to hold operators to account for better quality passenger information, monitoring performance against companies' customer information pledges, and maintaining our focus on how passengers are kept informed during unplanned disruption.

In December, we published a report calling for better information on board rail replacement bus services. We welcomed the good progress made over the past year on the quality of advance information, but concerns remain with the lack of information during the journey itself. We tasked operators to review their approach and demonstrate to us how their processes are fit for purpose. An industry workshop in early 2025 discussed the report's findings and recommendations.

Working with Transport Focus, in January we brought together over 70 senior leaders from across

the rail industry to collaborate on improving the experiences of passengers on trains stranded between stations, following a number of high-profile incidents in 2024. The event heard from industry colleagues on work to review, update and test processes for helping passengers and keeping them safe. We were greatly encouraged by the level of engagement and we, together with Transport Focus, will work further with industry to ensure focus is maintained on this important issue.

Work continued on the transparency of fees charged by third party ticket retailers through their websites and apps. Seatfrog was added to the seven retailers we had previously written to with our concerns: MyTrainTicket, Omio, Raileasy, Rail Europe, Train Hugger, Trainline and Trainpal.

Following constructive engagement, we were pleased to confirm that all have now improved the presentation of information about their fees to address our concerns. Changes include incorporating fees into the total price at the earliest opportunity, more transparent fee information throughout the booking process, and improved FAQs. The Digital Markets, Competition and Consumers Act 2024, which took effect from April 2025, strengthens requirements and we recommended that retailers have processes in place to ensure compliance.

In November we were asked by the then Secretary of State to review train operators' and retailers' revenue protection practices, such as how they communicate ticket conditions and the use of penalty fares and prosecutions. We provided recommendations to Government in May 2025.

Our plans to review the existing retail information code of practice were paused while we undertook the revenue protection review and will now be delivered in 2025-26.

Complaints handling and redress

In April we published a report on disabled passengers' experience of making complaints, including access to redress, following last year's comprehensive review. We found that some disabled passengers experience inadequate standards of service in the complaints process, including accessibility issues and lack of information on how to seek redress for booked assistance failures. We also found that in the previous two years 36% of disabled passengers didn't complain when they believed they had cause to and 45% didn't seek redress on any occasion when they could have.

We identified some non-compliance with the complaints code of practice and accessible travel policy guidance and engaged with relevant operators to drive improvement. We also asked all

operators to look at complaints specifically from disabled passengers and report what they have done to rectify the issues in their annual reports. We will continue to follow up on the research findings and monitor operators' actions.

We have continued to hold the Rail Ombudsman to account for effective delivery of contractual requirements and improvements. This includes improving passenger and train operator user experience through the rollout of a new website and case management system. These new systems will also meet the recently updated web content accessibility guidelines, and the website will provide consumers with a British Sign Language video version of their quick start guide.

In July we published the annual consumer report, highlighting the work that we had undertaken in the previous year to protect the interests of passengers and improve their experience of the 1.6 billion rail journeys they made. We committed to continuing targeted interventions to tackle under performance and drive service improvements.

Access (capacity use including timetabling) and licensing

We continued to engage closely with DfT and the GBR transition team on proposals for reform of the law and our role on access to the network. We published updates to our evidence on assessing the costs and benefits of open access passenger services. We also updated our guidance on starting new rail operations and on open access, including taking into account the new government's expectations.

During the year, we continued to perform our statutory role of reviewing, approving and where necessary directing alternative decisions taken by Network Rail on the use of network capacity (as well as station and depot assets). This enabled Network Rail and train operating companies to enter contracts to provide new or amended train services for the benefit of passenger and freight customers.

Meeting all our service standards for access within our statutory timescales, we reviewed and approved 202 new and amended track access contracts for passenger (including open access) and freight operators; and reviewed and approved 613 access contracts for stations, depots, freight terminals, other service facilities and connecting networks. In April 2024, we initiated a programme of work with Network Rail to progress a large number of interacting access applications across some of the most congested parts of the rail network, and we have publicly held Network Rail to account for its delivery against that programme.

Over the course of Autumn 2024, we facilitated the access contractual changes needed to support First Group's acquisition of Grand Union Trains operations supporting First's investment of £500 million in new rolling stock to be manufactured in the UK. In November, we approved a new regional co-operative service in the West Country – giving it the opportunity to secure the finance it needs to start operations. At the end of March 2025, we agreed a long-term extension to Grand Central's open access contract enabling its owner Arriva to invest £300 million in new hydrogen-powered trains.

Regarding international passenger services, we brought senior stakeholders in the market together in June to discuss barriers and opportunities for competition and growth. This identified that depot capacity for international trains is a key constraint, and at the end of March 2025 we published our initial findings from our independent investigation into the availability of capacity at Temple Mills International Depot. We are continuing to work closely with government, London St. Pancras Highspeed, Eurotunnel and operators, including in response to applications for us to direct access to Temple Mills.

Resilient and high-performing timetables are an essential part of providing a good service to passengers and freight customers. In our 2023 periodic review determination, we required Network Rail to return to compliance with timetable production milestones, which results in a published timetable 12 weeks in advance, by December 2024. It is to Network Rail's and the industry's credit that compliance was achieved and has been sustained.

Our licensing work protects the public interest by ensuring that operators of rail assets are fit and proper. During 2024-25, we issued 11 licences or licence exemptions for operators of railway assets, meeting our timescale commitments to industry in every case.

As a condition of its network licence, Network Rail must not dispose of its land and property assets without our consent, to ensure that land that has a reasonably foreseeable railway use is not lost from the railway. During the year, we reviewed 10 proposed disposals, giving consent to each. We also completed to time our annual audit of Network Rail's land disposals, further safeguarding the continued operation and future development of the network. Under Network Rail's financial ringfence licence condition, we also gave the company consent to assist in the construction of a new rail spur, to facilitate the development of Sizewell C's new power plant.

We conducted our annual reviews of network statements for Eurotunnel, HS1, Northern Ireland Railways, Crossrail Central Operating Section, Heathrow Airport and Core Valley Lines. Our activity in this area ensures that all operators, including new entrants to the market, are clear about the

arrangements for getting access to these networks, improving the prospects of them introducing new services that will improve passenger choice.

Our performance against 2024-25 business plan deliverables

Whilst we have made every effort to achieve our customer-focused deliverables for 2024-25, a number of them have been impacted by factors outside of our control, including rail reform.

2024-25 Commitment	Status
Consult on proposals to require operators to take passenger views into account when considering station staffing changes	Paused [note 1]
Report and consult on a review of our open access economic assessment methodology	Met
Publish six-monthly data on ORR and industry's compliance with sale of access and timetabling deadlines	Partially met [note 2]
Assess and report on the quality of passenger information for planned rail replacement services	Met
Develop a new approach to benchmarking operators' performance on provision of assistance to passengers	Not met [note 3]
Conclude and publish the outcome of the review of the Retail Information Code of Practice	Paused [note 4]

2024-25 Commitment	Status
Conduct annual review of network statements for Network Rail, Eurotunnel, HS1, the Heathrow Airport Link and Core Valley Lines	Met

Note 1: The consultation on proposals to take passenger views into account when considering staffing changes has been paused until government policy in this area becomes clearer.

Note 2: The publication date of the second six-monthly report was delayed to 29th April 2025 to provide more time to assess and include information relating to the December 2025 timetable. Data for the first six-month period has been published.

Note 3: The public consultation on our proposed approach to benchmarking operators' performance on provision of assistance to passengers resulted in a wide range of responses from both industry and consumer groups, and we are revisiting aspects of the design of the framework. We now plan to publish the consultation response in Q2 2025-26.

Note 4: The review of the Retail Code of Practice is temporarily paused as it will be directly impacted by the findings of the Revenue Protection Review.

Future plans

In our deliverables for 2025-26, we have committed to the following priorities:

- a focus on passengers who require assistance by developing benchmarking of train companies' assistance provision and reporting on the effectiveness of communications between stations;
- completion of our review of the Retail Information Code of Practice;
- recommendations to government on rail companies' revenue protection practices;
- review our Accessible Travel Policy guidance requirements for failed passenger assistance;
- conclusion of our examination of depot capacity for new international train services and decision on who will use this capacity;
- publication of data on ORR and industry's compliance with sale of access and timetabling deadlines; and

- our annual review of network statements for all regulated infrastructure managers.

Strategic objective 3: Value for money from the railway

ORR works to ensure that the railway is run in the most efficient way for users and funders and holding Network Rail to account is a key role for us. We also regulate other significant elements of the national rail infrastructure, including London St. Pancras Highspeed (formerly High Speed 1) and the UK portion of the Channel Tunnel. In addition, we have a number of roles that help secure a better
deal for rail users now and in the future.

Holding Network Rail to account

Marking the commencement of control period 7 (CP7), we published an open letter in April outlining Network Rail's work for the period. Throughout the year we engaged with the company, monitoring progress against its delivery plan and advising funders, to ensure that the settlement funding is well spent.

Train performance, and how Network Rail can support a more punctual and reliable service for both passengers and freight customers, has been a key focus.

In September we announced we were satisfied with the improvement plan we had ordered Network Rail to produce for the Wales & Western Region, following our 2023 investigation into deteriorating train performance. We have since seen a welcome improvement in reliability for all users, which we will continue to monitor closely.

In October we asked Network Rail to address significant performance issues across the Eastern Region. We advised the company to take a whole-system approach and work closely with train operators and stakeholders to deliver a comprehensive improvement plan.

We have started work with industry to reset Network Rail's passenger train performance trajectories and incentive regime for the last three years of CP7 (2026-27 to 2028-29). In December, after extensive engagement with industry and other stakeholders, we concluded on measures that will help track and train come closer together in delivering more reliable services for passengers and supporting the economy. In 2025-26, we will finalise the passenger train

performance targets and the recalibration of associated financial incentives.

In July we published our annual assessment of Network Rail's delivery to its stakeholders across its regions and functions in the final year of control period 6 (CP6). We found that following a period of declining train service performance, Network Rail had implemented regional improvement plans and train reliability and punctuality had largely stabilised during the year, with the exception of Wales & Western and barring the effects of severe autumn and winter weather.

In October we followed up with our annual efficiency and finance assessment. This concluded that Network Rail delivered its efficiency targets, with £1.1 billion of improvements in the final year of CP6 and £4.0 billion of efficiency improvements in CP6 as a whole. However, the company's financial underperformance meant that it spent £2.8 billion more than expected for what it delivered.

During the year, through engagement with industry experts, we identified an initial set of suitable whole industry "explanatory" indicators on train performance but have accepted stakeholder views that this is not the right time to finalise and publish this data.

Looking ahead to the next funding period (CP8), we engaged with industry and commissioned external research on potential approaches to charges for passenger and freight operators. Our discussion paper, produced in March, is designed to support the industry as the development of the access charges framework moves to GBR.

Cross-industry and government engagement

As the combined safety and economic regulator, we reviewed how costs and benefits are assessed for safety initiatives. Our report, published in March 2025, identified learning points for ORR and industry to deliver best practice.

In the same month we published a report on productivity across the whole rail industry, covering both train operating companies and infrastructure. Productivity is a major driver of economic growth and value, and our report shows that it has improved since the pandemic (in 2020-21) as more trains are run and costs reduce. However, productivity is lower than a decade ago and lags the wider economy for both passenger and freight operators. The report provides a useful baseline for measuring future productivity changes as we look ahead to rail reform.

Throughout the year we have continued to engage with government on how our regulatory

activity can support the right environment for investment at a time of transformation in the industry.

High Speed 1 (HS1)

A significant piece of work this year has been our 2024 periodic review (PR24) of High Speed 1 (HS1) (now London St. Pancras Highspeed), which sets the charges for access to the network for control period 4 (CP4), the five years commencing this April. This was our third periodic review for the route infrastructure and our first review of the four stations. We published our draft determination in September and, following detailed consultation, our final determination in January.

Looking in particular at affordability and asset sustainability, we announced that we would direct the company to lower its charges for passenger and freight train operating companies to use the high-speed line. We identified specific areas for further improvements in the company's spending plans, resulting in savings to users. This will support growth in the freight market and long-term increases in passenger traffic, including the potential introduction of new operators.

In July, we published our annual report on the company, noting that in the period April 2023 to March 2024 traffic volume on the route increased by 3 per cent compared to the previous year but was still 18 per cent lower than before the pandemic.

Promoting competition

In June 2024 we concluded our major market study on the provision of railway station catering services, recommending a number of remedies to increase competition. In February, in light of our findings, we also shared our views on lease protection with the Law Commission as part of its review and consultation related to part 2 of the Landlord and Tenant Act 1954.

We also began looking again at the passenger rolling stock leasing market. In March we launched a review of the transparency order originally imposed by the Competition Commission (now Competition and Markets Authority (CMA)) in 2009, to determine whether there has been a material change in the market that alleviates the competition problems identified. We will complete the review later this year.

We continued to support the CMA on rail-related mergers and, reflecting our concurrent powers in relation to competition law, considered complaints about potential anti-competitive behaviour

(although determined that there were insufficient grounds to open formal investigations this year). We continued to provide other competition advice to government and stakeholders, including on matters related to open access.

Information and analysis

ORR is the publisher of official statistics for rail, and our transparent reporting and analysis helps us hold industry to account. We have increased our use of technology and improved internal processes to provide this valuable information to the public, policymakers and other stakeholders in a more efficient, accessible and engaging way.

In November we published our annual rail industry finance (UK) statistics, an important barometer of the financial health of Britain's railways. We reported that in the year 2023-24 train fare revenue rose by 14 per cent on the previous year, but more slowly than passenger journeys, which rose 16 per cent, and both remained short of pre-pandemic levels. Government support remained substantial at £12.5 billion, just under half of the income for the day-to-day running of the railway. In addition to this, Government provided £9.6 billion of enhancements funding, which included £7.3 billion for HS2.

Our performance against 2024-25 business plan deliverables

2024-25 Commitment	Status
Publish open letter on conclusion of PR23 and outline future CP7 work	Met
Publish final report on railway station catering market study	Met
Publish annual assessment of Network Rail	Met
Publish annual assessment of HS1	Met

2024-25 Commitment	Status
Produce draft determination for HS1 (PR24)	Met
Publish Network Rail annual efficiency and finance assessment	Met
Publish annual assessment of Network Rail's stakeholder engagement	Met
Publish annual rail safety statistics	Met
Publish annual rail industry finance statistics	Met
Publish statistics on annual estimates of station usage	Met
Produce final determination for HS1 (PR24)	Met
Consult on approach to charges for CP8	Met

Future plans

In our deliverables for 2025-26, we have committed to do the following:

- consult on and complete the CP7 passenger train performance reset;
- report on productivity in the rail industry;
- complete our review of the rolling stock market transparency order;
- monitor and report on open access;
- publish our annual assessments of Network Rail and London St. Pancras Highspeed;

- publish our annual assessment of efficiency and finance;
- report on Network Rail's stakeholder engagement;
- release annual statistics on rail safety, station usage estimates and rail industry finance;
- report on our initial engagement with Network Rail to reduce administrative burdens we impose;
- publish the initial findings of our deep dive into the rail investment framework; and
- review our rail industry-facing KPIs following engagement with the sector.

Strategic objective 4: Better highways

ORR is the independent regulator for National Highways. We hold it to account to ensure that it manages, operates and improves the strategic road network (SRN) in England efficiently and effectively on behalf of road users and taxpayers.

Assessing National Highways' performance

During the year we published our annual assessment of National Highways' performance and the outcome of our investigation into the company's performance and delivery.

Our assessment, published in July, reported that National Highways was at risk of not being able to fully deliver the expected benefits of the second road investment strategy (RIS2, 2020-25) for road users and taxpayers. This was due to a combination of factors within and outside of its control. Our assessment for 2024-25 will report on delivery of RIS2 at the end of the road period.

In the same month our investigation report found National Highways to be non-compliant with its licence in relation to information the company must collect, record and provide to enable us to ensure that it is delivering efficiently and effectively for road users and taxpayers. We identified improvements that the company needed to make to address this. The investigation further identified areas where the company needed to improve, particularly on how it gathers and provides evidence of how it makes decisions and how it learns lessons and then applies them to improve its performance and/or delivery.

The company shared its post investigation improvement plan (PIIP) with us in September and we have been monitoring implementation. The plan was comprehensive. The company made good progress delivering the plan over the last year and is continuing to do so into 2025-26. In the round we are pleased with the progress made. It demonstrates clear buy-in from senior leaders and

reflects the significant amount of work done to date by the company. It is important that the company continues to implement the improvements it has identified in its plan. This includes improving its ability to understand the basis upon which it makes interventions, their impacts and how these translate into improved efficiency, effectiveness and performance for road users and taxpayers.

Safety on the strategic road network including smart motorways

Our third annual assessment of safety performance on the SRN was published in March 2025. We found that apart from during the pandemic, when there was significantly less traffic, 2023 had the fewest deaths and serious injuries ever recorded on the SRN. However, it is improbable that National Highways will meet its safety target for the end of 2025.

We found that stopped vehicle detection technology on smart motorways was achieving performance requirements at a national level, but our ability to conclusively assess technology performance this year was affected by the amount of roadworks taking place for the national emergency area retrofit programme.

In March 2025 we also published our quality assurance of National Highways' smart motorways safety update report. We found that the data and evidence included in the report were relevant and appropriate, and that the company continued to follow appropriate analytical assurance processes to ensure the reliability of its analysis.

Preparing for the third road investment strategy (RIS3)

As part of the 2024 Autumn Budget, the government announced that it was delaying the start of the third road period (RP3) until April 2026. As such, the development of RIS3, and our efficiency review, has been delayed. The government also announced that the intervening year would be covered by an interim settlement. In response, we undertook a rapid review of National Highways' plans for the interim period and advised the government on the deliverability and affordability of those plans, and the performance outcomes and delivery outputs that should be expected for the available funding. We will continue to work with DfT and the company over the coming year, to ensure a challenging and deliverable performance framework is in place for the start of RP3.

The delay to RP3 also impacted our plans to refresh our policy on how we hold National Highways to account.

In September we completed a public consultation on this and in 2025-26 we will respond to that consultation and prepare a refreshed policy to come into effect from 1 April 2026. We adjusted our timeframe for issuing the new policy to provide certainty and consistency to the company during the interim settlement year (2025-26).

Our performance against 2024-25 business plan deliverables

2024-25 Commitment	Status
Carry out efficiency review of National Highways' strategic business plan for RIS3	Met
Quality assure National Highways' annual smart motorways safety update report	Met
Publish the outcome of our investigation into National Highways' performance, delivery and capability	Met
Publish our annual assessment of National Highways' performance	Met
Publish regional benchmarking of National Highways' performance	Met
Publish our third annual assessment of safety performance on the strategic road network	Met
Refresh our policy on how we will hold National Highways to account for the third road period (RP3)	Paused [note 1]

Note 1: We have completed a public consultation on our 'holding National Highways to account' policy but have reforecast this commitment as a result of the government announcement to delay RIS3. We intend to publish the response to the consultation and our updated policy ahead of the start of the third road period (RP3) in April 2026.

Future plans

In our deliverables for 2025-26, we have committed to publishing the following:

- an efficiency review of National Highways' strategic business plan for RIS3;
- our annual assessment of National Highways' performance and regional benchmarking of performance;
- our fourth annual assessment of safety performance on the strategic road network;
- our refreshed policy on how we hold National Highways to account; and
- a consultancy report on how National Highways engages with stakeholders.

Our people and performance

As an organisation, we are committed to carrying out our regulatory duties efficiently, effectively and transparently, to deliver the best value for money for all stakeholders. This year we have made good progress on modernising our ways of working and supporting and developing our people.

Technology, data and processes

A significant piece of work this year has been development of our new three-year technology strategy, 'empowering ORR through digital transformation', launched in February. This has allowed us to understand how technology can support delivery of the organisation's goals in a more efficient way, by streamlining and automating processes and harnessing artificial intelligence (AI), in line with civil service objectives. It also improves our ability to upskill our people at scale to use the new, more efficient digital administrative tools we have made available.

A good example of our implementation of tech-driven solutions has been the launch of our HR helpdesk, which contains self-help resources for people to manage queries themselves, before escalating to HR if necessary. This has freed up our HR expertise to focus on key organisational needs, such as providing training and strategic insights. A new service level agreement will enable insights into the types of questions coming to HR and drive further development of the library of

tools and communications.

Alongside the helpdesk we launched a new case management tool to help HR support employee relations, and we expect smarter management of workflows to lead to a reduction in the time taken to resolve cases.

Ensuring that our critical systems and data are safeguarded against potential cyber threats and disruptions has remained a high priority. In line with the 'secure by design' objective in our new technology strategy, we have completed the first cycle of our rolling 12-month cyber security plan, implementing recommendations from audits, security testing and measures required by central government, to align the organisation with industry best practice. We are using AI where possible to help predict cyber threats and enhance protection on our systems.

We have worked with public sector partners externally on exercises to enhance business continuity and ran a successful internal campaign on phishing, which enhanced staff awareness of ever-evolving cyber threats.

Supporting and developing our people

In May we launched our refreshed diversity and inclusion (D&I) strategy, focusing on 'representation, ownership, leadership and engagement'. As we come to the end of year one, a key achievement has been an increase in disability disclosure rates. We have run mandatory equality impact assessment training for our senior leaders, who are disseminating the training to their teams. We have also regularly showcased the good practice and positive organisational impact of people's D&I activity. In November our planned audit of our culture and behaviours gave valuable insights, and we are integrating the feedback into how we operate in a more efficient way, with fewer silos and greater collaboration.

As part of our cycle of D&I learning, we ran mandatory bystander training for all colleagues. This was received positively, giving people the tools to recognise and respond appropriately when they witness or experience bias or harassment in an informal setting. The training was followed by awareness sessions and plans to introduce bystander e-learning into new joiner inductions. Our new sexual harassment risk assessment process went live in March, to examine where colleagues may be most vulnerable to harassment and provide prevention mitigations.

We provided risk management training to our risk champions in May and to deputy directors in July, with positive feedback, and e-learning training was then rolled out to colleagues in the rest of

the organisation. We also provided fraud awareness training to everyone in our corporate functions, which is inherently the highest risk area.

As part of our focus on talent management and enhancing our leadership and management capabilities, we ran monthly learning and development interventions for employees at all levels, focussing on various skills required by the organisation, from project management to presenting data. Our plan to introduce new people data dashboards for managers was cancelled following an announcement in the Government's 2024 Budget to stop all non-essential consultancy spending. However, we have continued to develop our people data packs that are shared quarterly at Executive Committee meetings, containing insights on employee demographics, skills gaps, and so on, to help us identify any interventions needed.

Over the summer, as part of our expanded intern programme to support early careers, we welcomed seven students into our teams. This gave them exposure to subject matter experts, insights into how a professional environment functions, and opportunities to build technical and soft skills. We also continued our successful multi-discipline apprenticeship programme and currently have 15 apprentices.

An objective in last year's business plan was to revise our procurement policy and procedures to comply with the new Procurement Act 2023 and in February we published our updated procurement policy.

Recruitment activity



4,991
total applications received leading to
54
new starters

Our people survey



A response rate of
74%
and an engagement score of
63% overall

Learning and development



91% of all staff completed active bystander training

Employee benefits



52%
of staff are active users of the Reward Gateway benefits portal

Management

83%
of managers have completed the new Civil Service line manager standards



Our performance against 2024-25 business plan deliverables

2024-25 Commitment	Status
Provide risk management training for ORR employees	Met
Provide fraud awareness training for ORR employees	Met
Introduce people information dashboards for managers	Re-planned [note 1]
Complete the first cycle of our rolling 12-month cyber security plan	Met

2024-25 Commitment	Status
Hold an ORR business insight day in partnership with Access Aspiration	Met
Revise ORR procurement policy and procedures to comply with new procurement legislation	Met
Deliver bystander intervention training	Met
Evaluate and benchmark organisational culture via a culture audit	Met
Finalise ORR's new 3-year technology strategy	Met

Note 1: Following the Government's request to stop non-essential consultancy spend, work on a people information dashboard was re-planned.

During 2024-25 we also met a commitment from 2023-24, to fully implement a new case management system.

Future plans

Our deliverables for 2025-26 are to:

- conduct a hardware review and begin a phased rollout of new hardware;
- formalise the digital champions network within ORR;
- embed our new HR helpdesk;
- launch a new recruitment applicant tracking system; and
- provide staff training on new sexual harassment legislation.

Delivery of service standards

Much of ORR's business-as-usual work 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. The service standards below were published in our business plan for 2024-25. The table shows how we performed against each of these.

Our performance against 2024-25 business plan deliverables

2024-25 Commitment	Status
Provide risk management training for ORR employees	Met
Provide fraud awareness training for ORR employees	Met
Introduce people information dashboards for managers	Re-planned [note 1]
Complete the first cycle of our rolling 12-month cyber security plan	Met
Hold an ORR business insight day in partnership with Access Aspiration	Met
Revise ORR procurement policy and procedures to comply with new procurement legislation	Met

2024-25 Commitment	Status
Deliver bystander intervention training	Met
Evaluate and benchmark organisational culture via a culture audit	Met
Finalise ORR's new 3-year technology strategy	Met

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Provision	Service standard	Percentage achieved
Issue new or revised train driver licences	100% of applications decided within one month of receipt of all necessary documentation	100%
ROGS safety certificate and authorisations (Railway and Other Guided Transport Systems Regulations)	100% determined within 4 months of receiving completed application	100%
Report to Rail Accident Investigations Branch (RAIB) on the progress of its recommendations	100% response to RAIB recommendations within 1 year of associated RAIB reporting being published	100%
Efficient processing of technical authorisations	100% of responses within 28 days of receiving complete submission	100%
Approve the accessible travel policy of a new licence holder	100% approved within 6 weeks of receipt of all relevant information	100%
Track, station and depot access applications	100% decided within 6 weeks of receipt of all relevant information	100%

Provision	Service standard	Percentage achieved
Operator licence and licence exemption applications	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	100%
General enquiries and complaints, including adjustment to account for cases investigated	95% of enquiries and complaints responded to within 20 working days of receipt	98%
Prompt payment of suppliers' invoices to ORR	90% paid within 5 days of valid invoice	90%
Prompt payment of suppliers' invoices to ORR	100% paid within 30 days of valid invoice	100%
Publication of the four accredited official quarterly statistical releases	100% published within 4 months after quarter end	100%

Provision	Service standard	Percentage achieved
Market studies	100% of interim market study reports published within 6 months of launch of market study	100%
Market studies	100% of final market study reports published within 12 months of launch of market study	100%
Proactive preventative regulatory interventions	50% (minimum) of ORR inspector time spent on proactive, preventative regulatory interventions.	52%

Risk profile

The key corporate risks managed by ORR during 2024-25 were as follows:

Principal risks and mitigating actions	Risk category	Change in the year
Lack of sufficient trained and competent safety	Reputational	Score was

Principal risks and mitigating actions	Risk category	Change in the year
specialist staff to deliver our statutory and regulatory functions. We have increased oversight of operational work and improved risk-based work planning to manage the loss of experienced staff and target allocation of resource to where it is most needed (including statutory work and legal casework). We have strengthened learning and development support, to address the significant challenges caused by the loss of experienced staff and high proportion of junior and trainee inspectors. We continued to address competency gaps, such as in quantified risk assessment and digital safety, to avoid falling behind the evolving industry risk profile. We conducted succession planning by embedding a fixed annual trainee programme to maintain future inspector numbers.		raised during the year and then remained stable
ORR does not hold Network Rail to account for declining train service performance. We held Network Rail to account in accordance with	Reputational	Score remained the same throughout

Principal risks and mitigating actions	Risk category	Change in the year
our holding to account policy, escalating concerns with train service performance where relevant. We publicly reported on Network Rail's contribution to train service performance, including through our Network Rail annual assessment report. We concluded our investigation into Network Rail's contribution to train service performance in its Wales & Western Region and issued an order, requiring it to develop and deliver a holistic improvement plan. We also required the Eastern Region to provide a performance improvement plan. We engaged with industry stakeholders on our approach to holding to account for train service performance.		the year
New plans for rail reform are based on misunderstandings of the industry structure and regulatory framework. We have worked closely at all levels within DfT to provide support and have engaged with HMT and other key stakeholders to understand their positions and advise.	Strategic	Score was raised during the year and then remained stable

Principal risks and mitigating actions	Risk category	Change in the year
We have ensured our internal experts feed into discussions on rail reform to ensure quality and effectiveness of our input to DfT and others.		
We do not keep pace with emerging cyber security threats which results in a cyber-attack on the critical infrastructure of the business. We continue to keep network management up to date and in accordance with Government standards and best practice. Laptop and mobile device encryption and multi-factor authentication have been in place throughout the year. We continue to review and maintain security policies, including how our data is accessed. Colleagues are reminded of their responsibilities in respect of data security and are encouraged to report potential problems. Regular testing and simulated phishing attacks are used to support colleagues in this area.	Operational	Score remained the same throughout the year

Principal risks and mitigating actions	Risk category	Change in the year
We monitor threats and implement security measures with advice from partner organisations where appropriate.		
ORR's reputation as a health and safety regulator is diminished by Fatal Accident Inquiries (FAIs), challenges to enforcements decisions or negative media coverage. We collaborated closely with our communications teams to manage media narratives and maintain stakeholder confidence, including in coroners' courts and to ensure consistent, informed engagement with external stakeholders to maintain credibility in regulatory decision-making. We implemented strategic and resource-focused approach to managing the increasing scrutiny from FAIs, particularly high-profile cases like Carmont. We strengthened oversight of enforcement decisions to mitigate challenge from dutyholders. We put in place processes to learn from legacy incidents through prior role reviews (PRRs), act on PRR recommendations, and support cross-agency initiatives on health and safety risk policy.	Reputational	Score was raised during the year and then remained stable

Principal risks and mitigating actions	Risk category	Change in the year
Delays and challenges in setting RIS3 lead to a loss of confidence in the roads reform system and impact ORR's advice to the Secretary of State. Following the government's decision to delay the start of the third road period, we undertook a rapid review of National Highways' plans for the interim period and advised government on their deliverability and affordability. RIS3 development has continued throughout the year. We have maintained a flexible approach to the changing programme to ensure that we can provide high quality advice in a timely manner.	Reputational	Score remained the same throughout the year

Sustainability report

Our regulatory functions give us significant influence on the environmental impact of the rail and road industries. We have different environment and sustainability duties for rail and road, and the industries are subject to different goals and legislation. We are also subject to sustainability and reporting duties as a public authority through the Greening Government Commitments.

We regularly meet with statutory environmental bodies across England, Wales and Scotland and contribute to various forums to understand the key sustainability challenges for the industries we regulate, and potential ways to address them.

Looking at work across both rail and road, in November we published our climate change adaptation report as part of the fourth round of reporting (ARP4), a requirement under the Climate Change Act to support government understanding of infrastructure-related climate

change risks and progress in managing and mitigating them. Our report provides a high-level overview of the risks, impacts and barriers facing the main industry bodies we regulate, like Network Rail, National Highways and London St. Pancras Highspeed. It also looks at railway passenger and freight operating companies to understand what they are doing on climate change adaptation in line with their statutory duties.

Holding Network Rail to account

In the past year we have continued to have an increased focus on environmental sustainability across the national rail network, to ensure it is on track to meet key legislative requirements for decarbonisation, biodiversity and environmental improvement.

In this first year of CP7 we have monitored delivery of the more robust environmental outcomes we set Network Rail during PR23, covering carbon emissions, biodiversity and air quality. We are also working with the company to agree new environmental performance measures for whole life infrastructure and circular economy, which will be formally agreed early in year two of CP7 under the PR23 'managing change' process.

Carbon emissions

We are pleased to say that Network Rail has started to address many of the recommendations made by an independent reporter, published in January 2024. This includes updates to Network Rail's forecasts for scope 1 and 2 carbon emissions reductions based on a consistent, best practice methodology for all regions and also now covering emissions from route services operations.

We remain in discussion on these updated forecasts and the assumptions on which they are based and expect to reach agreement early in the new business year. Our focus is on ensuring they represent stretching targets that accurately capture benefits from grid decarbonisation, financial investments in buildings and infrastructure energy efficiency, and transition of Network Rail's fleet of around 10,000 vehicles to zero-emission. We are aware that Network Rail is currently in discussion with DfT regarding possible exemptions to the current DfT milestone for fleet transition of December 2027, and we will work with Network Rail to ensure updated forecasts take account of any exemptions agreed by DfT.

Network Rail's performance in the first year of CP7 fell short of its current target across the network for reducing scope 1 and 2 emissions. Only Eastern Region met its target, with three regions, North West & Central, Scotland and Wales & Western falling significantly short of their

targets. We expect Network Rail to significantly improve its carbon emissions reductions programme in year two of the control period to meet its network-wide and regional plans for decarbonisation.

For scope 3 and infrastructure carbon emissions, Network Rail Scotland has provided a measure and forecast for scope 3, which we anticipate being signed off by ORR early in Q2 2025-26.

We are concerned at Network Rail's delay in producing a robust and fit-for-purpose measure and forecast for whole life infrastructure carbon emissions across the GB network. Moreover, this performance measure does not fully meet the requirements set out in the PR23 final determination. We have taken action to ensure Network Rail demonstrates greater commitment to the development of this measure and forecast. We anticipate signing off an interim measure for year two of CP7 early in Q2 2025-26. We will work with the company in the coming year to produce a more robust measure for the start of year three.

Biodiversity

A metric on biodiversity units on the railway was adopted for the first time in PR23. We have also worked with Network Rail to develop additional assurance performance measures to report performance on managing habitat and reporting biodiversity improvement. These include woodland being actively managed on the railway estate; control of invasive species, which is now being reported; and implementation of nature-based solutions for reporting in years two to five of CP7. This and the feedback that ORR has previously provided on Network Rail's second state of the nature report has been incorporated into future reporting.

There has also been progress by Network Rail on the development of lineside habitat management practices, with the company adopting our recommendations and building these into its performance reporting to ORR on habitat management plans.

Circular economy

We have seen progress over the last year with Network Rail developing a new supporting measure performance metric for the circular economy metric, which will be 'waste re-use'. We are also encouraged to see Network Rail agreeing a number of additional circular economy assurance measures, covering circular design, circular operations and sustainable procurement. This bodes well for the rest of the control period.

Air quality at stations

We have continued to work with Network Rail and DfT on new requirements for the production of air quality improvement plans for priority stations and ensuring these are updated annually. During the year, we worked with the company to agree a definition of the performance measure against which it will report progress over CP7. We anticipate agreement on this during the second quarter of the year. In future, Network Rail will be producing performance milestones in its improvement plans, setting specific actions to improve air quality at stations, and we will be holding the company to account on delivering these milestones.

Weather resilience and climate change adaptation

The impacts of extreme weather, such as Storm Eowyn in early 2025, have continued to cause disruption for the railway. We hold quarterly meetings with Network Rail's weather resilience team to understand their preparedness for seasonal weather events and operational readiness.

CP7 included a new metric for Network Rail on weather resilience, as part of its asset sustainability measures. We have consistently pushed for the company's weather resilience and climate change adaptation (WRCCA) plans to be strengthened, incorporating updated climate forecasts, improved understanding of weather impacts, and clearer, more regionally-focused actions to support resilience.

We have agreed a reporting regime and template to support consistent tracking and are now monitoring delivery against the metric at regional level, working with Network Rail to ensure alignment with its wider business plans. As we move forward, our focus will be on monitoring the delivery of WRCCA plan actions and the adaptation pathways programme.

We have actively engaged at rail industry forums (such as RSSB's climate change adaptation working group) and with other regulators in this area, including the Environment Agency, Natural Resources Wales, and collective forums. This joined-up approach is useful in determining what metrics may be required in the future whilst also considering risk, funding and long-term outcomes.

Holding National Highways to account

We hold National Highways to account on progress against its commitment to deliver better environmental outcomes on the strategic road network. For the second road period (RP2) covering

April 2020 to March 2025, this includes holding the company to account on its performance against four key indicators: biodiversity, carbon emissions, noise and air quality.

We also track progress against several other environmental performance indicators covering carbon emissions from the supply chain, the condition of cultural heritage assets, water quality and litter.

In July, as part of our annual assessment of National Highways' performance in 2023-24, we reported that:

- National Highways has robust plans in place to meet its KPI target to deliver no net loss in biodiversity by the end of RP2. At the end of March 2024, the company was forecasting a net gain of 2,814 biodiversity units. National Highways had responded well to our challenge earlier in the road period, when it was forecasting to miss its target, by developing and delivering a substantial pipeline of biodiversity schemes and we were pleased to see it on track.
- National Highways' corporate carbon emissions continue to be worse than expected. Data showed that at the end of March 2024 the company was off-track to meet its target of a 67% reduction in emissions (from a 2017-18 baseline) by the end of RP2, with a forecast reduction of 65%. This projected gap is equal to 1,360 tonnes of CO2, or 15,173 petrol car journeys from London to Glasgow. Concluding that the additional actions that National Highways identified to meet its target were not expected to be sufficient, we continued to challenge the company to provide more robust evidence to support the decisions it has made.
- National Highways was on track to deliver its target on noise mitigation for those living near the strategic road network. Since the start of RP2 the company's programme of works had mitigated noise for 5,197 households (68% of its target), meaning it would need to deliver a further 2,303 mitigations in the final year of RP2. National Highways had identified 2,431 mitigations that it had high confidence of delivering in time but, given this left little contingency for delays, we have been closely tracking delivery throughout the remainder of the year.
- National Highways appears to have made reasonable progress to date in delivering its obligation on air quality. It is designing and implementing improvement measures for 21 sections of the strategic road network that still exceed legal limits on nitrogen dioxide, a pollutant common in vehicle exhaust emissions, to bring them into compliance.

Our next annual assessment is due to be published in summer 2025, when we will report on National Highways' progress against these environmental metrics during 2024-25.

ORR's own environmental strategy

We are committed to delivering the 2021-25 Greening Government Commitments (GGCs), which set goals for reducing emissions and resource use in the UK Government's estate and operations. Our corporate environmental strategy sets out the role we can play in our day-to-day operations to help advance the UK's sustainable development goals, the progress we have already made and further practical actions we can take, both as an organisation and as individual employees. It showed that we have already reduced our environmental impacts across several GGC metrics in recent years but that there are opportunities for further savings in the short-term and beyond 2025. Our environmental performance data since the 2017-18 baseline year is reported on page 51.

Task Force on Climate-related Financial Disclosures (TCFD)

Compliance statement

We have reported on climate-related financial disclosures consistent with HM Treasury's TCFD-aligned disclosure application guidance which interprets and adapts the framework for the UK public sector. We have complied with the TCFD recommendations and disclosures around:

- Governance (all recommended disclosures)
- Risk management (disclosures (a) to (c))
- Metrics and targets ((disclosures (a) to (c)).

This is in line with central government's TCFD aligned disclosure implementation timetable. We plan to make disclosures for strategy future reporting periods in line with the central government implementation timetable.

Board oversight

The ORR Board provides oversight of climate-related risks and opportunities in its role in holding to account Network Rail and National Highways and receives regular reports for each organisation which cover performance against environmental targets. Board governance arrangements are set out in the governance statement. In its annual horizon scanning exercise, the Board looked at the increasing political and societal focus on environmental issues as a wider external trend and

increased environmental impacts on road and rail as an industry-related trend. The Board also discussed ORR's environment duty in the context of rail reform. The Board also had oversight of the periodic review process of HS1 Ltd (PR24), which included HS1's environmental strategies and plans.

Management's role

The executive team is responsible for managing climate-related risks and opportunities on a day-to-day basis and for delivering our corporate environmental strategy. Executive governance arrangements are set out in the governance statement. Environmental issues impacting the rail and roads sectors are monitored through the Regulation and Policy Committee.

Risk management

Climate is not a principal risk for ORR as we are either sub-tenants in government premises or are the tenant of a private landlord in London, so we are limited in our ability to control utilities or waste. Within our control, the most significant impact on climate is business travel. Climate risks from business travel are managed through the travel and expenses policy which provides guidance on sustainable travel options. This is not considered to be a key corporate risk. We have not considered information from external risk frameworks as climate is not a principal risk for us.

The identification, assessment and management of climate-related risks in relation to the industries we regulate are integrated into our regular review of strategic risks as set out in the governance statement on page 70. The risk that climate change impacts on the rail and roads sectors are more severe than modelled in current and future funding settlements features in our strategic risk register, and the director-level risk owner for this risk is responsible for ensuring that it is actively managed.

Metrics and targets

We align our reporting with the current Greening Government Commitments framework covering the period 2021 to 2025, and targets are measured against a 2017-18 baseline to be achieved by March 2025. At March 2025 we had met all the GGC targets which are relevant to us, except for the target to reduce domestic flight emissions by 30%, where we have reduced emissions by 23%. 2024-25 was distorted by two colleagues who were required to travel frequently for specific timebound pieces of work. If we exclude these flights we would have met the target. In 2025-26 we will increase monitoring of flights taken.

Our work holding Network Rail and Highways England to account for their KPIs for environmental performance is set out above.

	2017-18 baseline	2024-25	% reduction	GGC headline targets
Emissions from electricity, gas and oil (tonnes CO_2)[1]	277	138	50%	✓ Reduce overall greenhouse gas emissions from a 2017-18 baseline
Business travel emissions (tonnes CO_2)[2]	244	136	44%	
Domestic flights emissions (tonnes CO_2)[2]	44	34	23%	✗ Reduce emissions from domestic business flights by at least 30% from a 2017-18 baseline
Total waste[1] (tonnes)	20	3	85%	✓ Reduce the overall amount of waste generated by 15% from the 2017-18 baseline
Paper use (A4 reams)[2]	2,158	455	79%	✓ Reduce government's paper use by at least 50% from the 2017-18 baseline
Water consumption (m^3)[1]	2,329	1,240	47%	✓ Reduce water consumption by at least 8% from the 2017-18 baseline

[Note 1] London data for both years, Glasgow data for 2017-18 only.

[Note 2] all offices

In the past year we have continued to gather data where available on our own environmental performance as an organisation and we report this to government through DfT. We have presented the data as transparently as possible and have noted where it has not been possible to obtain some information. Building-related data is provided only for the offices for which we are leaseholders (our London office and our Glasgow office up to November 2022, when we relocated to government premises). We do not currently receive data for the Government Property Agency offices in which we are resident but are expecting that we will start receiving it in 2025.

Mitigating climate change: working towards net zero by 2050

We have made good progress against this headline target and are on track to meet the sub-targets which are relevant to us.

Greenhouse gas emissions

Tonnes CO_2e

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2
Scope 2: Indirect emissions from the consumption of purchased gas, electricity and oil	277	274	107	24	99	116	15
Scope 3: Emissions from domestic and international	244	169	195	31	77	126	15

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
travel							
Total emissions	521	443	302	55	176	242	30

We do not have any scope 1 emissions. Scope 3 includes emissions from domestic and international travel. The GGC emissions reduction target applies to domestic business travel only. For a breakdown of domestic and international travel, see travel data below.

Energy consumption

Category	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	
Electricity – non-renewable (KWh)	440,157	480,562	243,175	-	-	-	
Electricity – renewable (KWh)	32,261	33,342	103,567	88,734	109,752	110,280	
Gas (KWh)	n.a	n.a.	n.a.	n.a.	414,783	509,160	
Oil (KWh)	251,016	209,180	66,742	-	-	-	
Energy expenditure (£)	83,075	82,709	73,896	75,411	77,007	162,873	

n.a = Data not available

Electricity consumption covers the London office and the Glasgow office until November 2022,

after which the office relocated to premises where another government department holds the responsibility for reporting. Gas reporting is for the London office only and based on an apportionment of the building. Gas consumption for 2024-25 increased due to increased occupancy and due a fault with the heating system which meant that the temperature was temporarily increased. When this was fixed, consumption reduced to a normal level. The figure for total expenditure is for all utilities for the London office and for Glasgow until November 2022.

Business travel

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2
Domestic travel							
Air (Tonnes CO2e)	44	28	39	1	7	21	3
Rail/ underground/ tram (Tonnes CO2e)	89	89	98	5	30	54	6
Car (personal vehicle) (Tonnes CO2e)	88	40	40	22	28	34	2
Hire car (Tonnes CO2e)	13	4	8	3	11	13	1
Total domestic travel (Tonnes CO2e)	234	161	185	31	76	122	1

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2
International travel							
Air – short haul (Tonnes CO2e)	4	8	6	-	1	3	6
Air – long haul (Tonnes CO2e)	2	-	4	-	-	1	1
International rail (Tonnes CO2e)	2	-	-	-	-	-	-
Total international travel (Tonnes CO2e)	8	8	10	-	1	4	2
Total business travel (Tonnes CO2e)	242	169	195	31	77	126	1
Expenditure on official business travel (£)	629,267	651,810	784,837	100,104	283,916	522,771	6

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
Domestic air travel	312,512	210,798	299,279	6,608	81,502	160,347	20

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
International air travel							
Short haul – economy (Km)	64,314	90,666	75,494	3,396	16,718	29,855	59
Short haul – business (Km)	1,027	-	-	-	-	-	-
Short haul – first class (Km)	463	601	2,956	-	-	880	-
Long haul – economy (Km)	-	-	-	2,288	-	9,846	19
Long haul – premium economy (Km)	-	-	35,087	-	-	-	38
Long haul – business (Km)	20,307	-	-	-	-	-	24
Total international air travel (Km)	**86,111**	**91,267**	**113,537**	**5,684**	**16,718**	**40,581**	**14**

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	2023-
No. of domestic flights	530	139	564	14	155	311	409

Business travel is reported for the whole organisation. Greenhouse gas emissions from travel increased in 2021-22 and 2022-23 as more normal travel requirements resumed following the pandemic. Our travel and expenses policy includes a sustainable travel hierarchy, encouraging colleagues to consider public transport first and to choose electric vehicles when hiring a car for business purposes where practical. Air travel can only be considered in specific circumstances.

Minimising waste and promoting resource efficiency

We have met the sub-targets which are relevant to us.

Waste

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
Non-hazardous recycled (Tonnes)	12	11	20	1	3	1	1
Non-hazardous incinerated/ energy from waste (Tonnes)	8	7	36	5	7	4	1
Total waste (Tonnes)	20	18	56	6	10	5	2
Waste collection Expenditure (£)	5,279	8,125	36,415	1,795	3,242	1,818	n.a

n.a = Data not available

Waste figures are for London and Glasgow only. The waste figures include data for the Glasgow office until November 2022, after which the office relocated to premises where another

government department holds responsibility for reporting. London waste figures are for a percentage of the building until September 2022, and actual weights for ORR thereafter. Waste collection costs are for London only and are based on an apportionment of the building. We do not have any waste that goes to landfill. Costs are now included as part of the service charge and are not separately available.

Paper use

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
Paper consumption (A4 reams)	2,158	1,520	995	150	100	355	38
Expenditure (£)	n.a	n.a	n.a	n.a	n.a	n.a	61

n.a = Data not available

Paper consumption is for all offices and has decreased significantly since 2017-18. The increase since 2022-23 is because of a legal requirement to print hard copies of review notices in relation to PR23 in 2023-24, and subsequently the need to purchase more paper in 2024-2025 due to depleted stocks (the paper consumption figure represents paper purchased rather than paper used).

Reducing our water use

Water

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
Water consumption (m3)	2,329	2,063	866	n.a	971	1,285	1,3

	2017-18	2018-19	2019-20	2020-21	2021-22	2022-23	20
Expenditure (£)	5,480	4,820	2,628	1,992	n.a	n.a	n.

n.a = Data not available

Water consumption and expenditure figures are for London only. Most water usage is controlled by the landlord. We work with our landlords to ensure they implement water-saving measures, such as fixing leaks, auditing appliances and installing sensor taps and low flush toilets. Dishwashers in our London office are controlled by cleaning staff to reduce use.

Procuring sustainable products and services

Sustainability is integrated into our procurement strategy proportionate to the spend and suitability of each procurement. We focus on sourcing products and services that align with our environmental and social goals, managing internal demand, and selecting sustainable suppliers where appropriate.

We use Crown Commercial Service (CCS) frameworks for streamlined procurement, thus ensuring environmental, social, and economic factors have been considered alongside price and quality. These cover a diverse range of needs, from everyday office supplies to comprehensive, end-to-end solutions.

We integrate sustainability early into suitable procurements, balancing social, economic, and environmental factors with price and quality for best value, prioritising suppliers with strong sustainability practices to support net zero targets. We follow best practices and guidelines, ensure fair competition, transparency, and proportionality, collaborating with suppliers to promote ethical practices, and encourage small and medium enterprise (SME) involvement to deliver a diverse and sustainable supply chain.

Our practices follow Government Buying Standards contributing to a sustainable future.

Adapting to climate change

We occupy most of our accommodation as sub-tenants of offices, therefore are limited in what is

achievable and practical for us. In our corporate sustainability strategy we have committed to developing a climate change risk assessment for our London office, and to contribute to our landlords' efforts in our regional offices.

Reducing environmental impacts from ICT and digital

We have continued our cloud-first approach to information technology and remain a predominantly cloud-based organisation. We have continued to utilise professional waste management organisations to ensure that our end-of-life technology is sustainably recycled or reused where possible.

Our finances

The public sector budgeting framework

The budgeting system is designed to support the UK's public spending framework. Estimates are the mechanism by which Parliament authorises departmental spending and are presented using the public sector budgeting framework. Through the Estimates process, Parliament is required to vote limits for different budgetary categories of spending. For ORR, these are the:

- Net resource departmental expenditure limit (RDEL) requirement.
- Net capital departmental expenditure limit (CDEL) requirement.
- Net cash requirement (NCR) for the Estimate as a whole.

A breach of any of these voted limits would result in an Excess Vote. Parliament must be asked to vote an actual amount for any control limit. Therefore, in ORR's case, as our income fully covers our costs, the Estimate shows a token £2,000 to be voted.

A summary of our income and expenditure and capital outturn compared to the 2024-25 Estimate is shown in the table below.

	2024-25 outturn (£000)	2024-25 Estimate (£000)	2023-24 outturn (£000)
Economic regulation income	(18,898)	(19,382)	(19,429)
Health and safety regulation income	(18,711)	(19,154)	(17,917)
Highways regulation income	(3,212)	(3,463)	(3,418)
Total income	**(40,821)**	**(41,999)**	**(40,764)**
Staff costs expenditure	31,440	31,891	30,731
Other costs expenditure	9,295	10,042	9,971
Finance costs	88	68	64
Total expenditure	**40,823**	**42,001**	**40,766**
Net operating cost/net resource outturn (RDEL)	2	2	2

	2024-25 outturn (£000)	2024-25 Estimate (£000)	2023-24 outturn (£000)
Net capital outturn (CDEL)	846	1,220	1,051
Net cash requirement (NCR)	370	2,000	(1,973)

This table ties directly to the statement of outturn against Parliamentary Supply on page 91, a key accountability statement which is audited.

Variances between Estimate and outturn

Income

All rail-related costs are recovered via licence fees or the safety levy which are invoiced based on estimated costs. Therefore, any over-recovery is treated as deferred income and any under-recovery as accrued income, as set out in note 5 to the accounts. All highways-related costs are recovered in full from the Department for Transport.

Income from economic regulation comprises income from the licence fee, HS1 and our monitoring of Northern Ireland. Health and safety regulation income includes income from railway service providers and from the Channel Tunnel.

Resource expenditure

In 2024-25 we spent a total of £40.8m compared to a budget of £42.0m and an outturn of £40.8m in 2023-24.

The majority of ORR's costs are staff costs, which accounted for £31.4m (77%) of total costs, compared to £30.7m (75%) in 2023-24. We spent £0.4m (1%) less on staff costs than budgeted, due

to recruitment being slower than expected. Our average staff cost per full-time equivalent (including employer's National Insurance and pension contributions) in 2024-25 was £83,175 compared to £82,168 in 2023-24.

We spent £0.6m (30%) less on consultancy than expected and £0.7m (33%) less than last year. The underspend on consultancy was a result of the Cabinet Office request to stop all non-essential consultancy in November 2024.

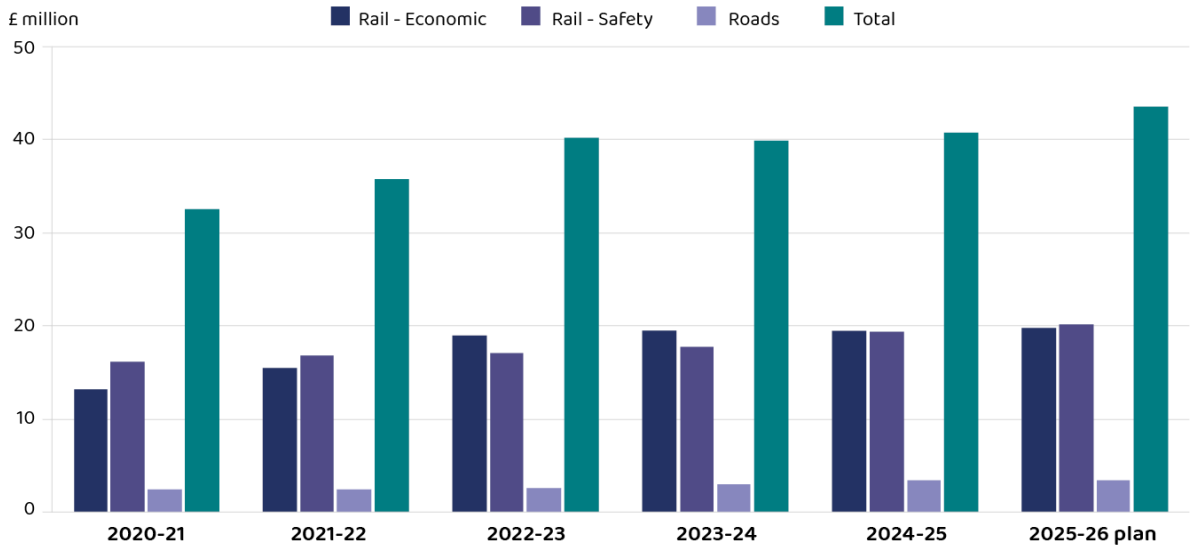
Assets and liabilities

At 31 March 2025, ORR remains in a net liability position. Net liabilities have decreased from £2.7m at 31 March 2024 to £2.2m at 31 March 2025. This has been mainly driven by a £0.7m increase in receivables due to an increase in court fees outstanding at the reporting date and the receivable due from HM Treasury's Consolidated Fund which was a payable at 31 March 2024 (see notes 9 and 13 in the financial statements).

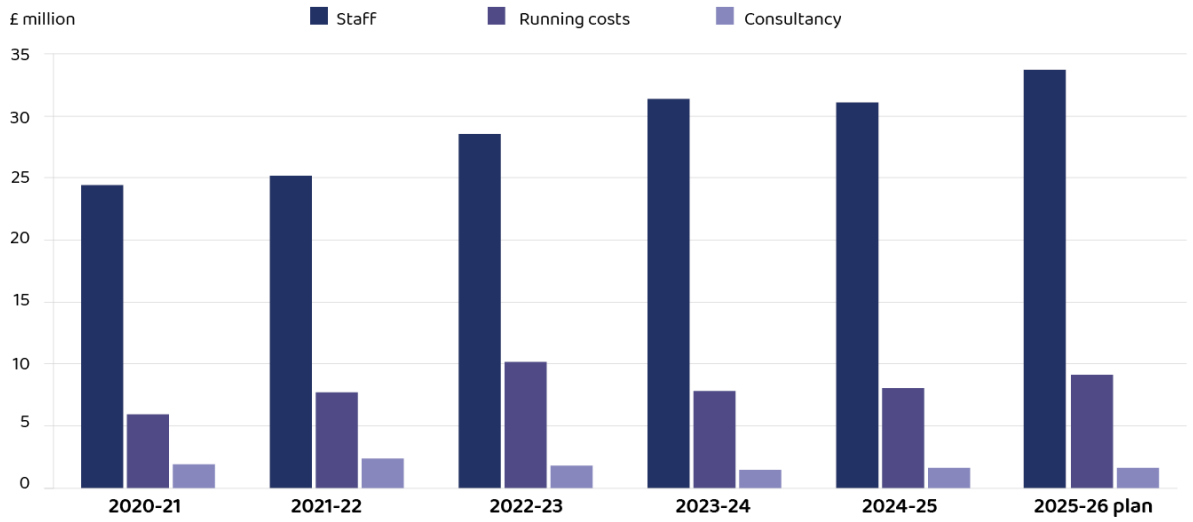
There has also been a decrease of £2.2m in the cash at bank but this is matched by a similar £2.3m decrease in trade and other payables showing that payments have been settled in year rather than accrued. There was also a £0.9m decrease in non-current assets as a result of the depreciation charge being higher than the additions to property, plant and equipment and other assets; and a £0.7m reduction in non-current liabilities as lease liabilities have been settled.

Long-term expenditure trends

The chart below shows our spending pattern, in cash terms, over the last five years and for the 2025-26 plan, split by key work area.

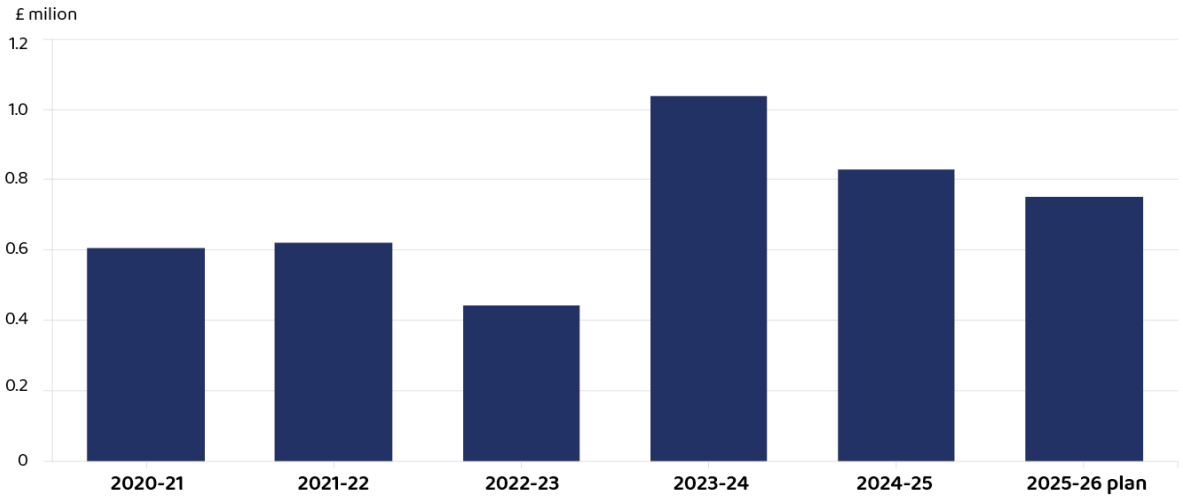


The following chart shows how our spending breaks down by category of spend over the last five years and for the 2025-26 plan.



Capital expenditure

Net capital expenditure was £0.8m compared to £1.2m budget due to planned moves into larger office space not taking place. The chart below shows CDEL outturn for the last five years and for the 2025-26 plan. Capital expenditure was higher than usual in 2023-24 at £1.0m due to a new IFRS 16 lease being entered into.



Net cash requirement

We had a net cash requirement (NCR) of £0.4m compared to £2.0m requested in the Estimate. We request an NCR to cover timing differences.

Future plans

We agreed our 2025-26 budget with HMT Treasury through phase 1 of Spending Review 2025 (SR25). Our overall operating expenditure budget will be £43.5m. We have also secured £0.7 million of capital budget, which we will use largely for renewal of operational assets. Our budget for 2026-27 to 2028-29 will be agreed through phase 2 of SR25.

Performance in other areas

Prompt payment

We are committed to the prompt payment of our suppliers and seek to pay all valid invoices as soon as possible. During 2024-25 100% of invoices were paid within 30 days (100% in 2023-24). We adopted the government standard of 90% of invoices paid within 5 days in 2024-25 and achieved 90%. In 2023-24 we achieved 93% of invoices paid within 10 days (our previous target was 80% paid within 10 days).

Complaints made to the Parliamentary Ombudsman

If someone is unhappy with the service they have received from us, they can raise a formal complaint in writing with the head of the public correspondence team. Their complaint will be acknowledged and passed to the relevant director to respond. If the complainant remains unhappy, they can escalate their concern to the Parliamentary and Health Services Ombudsman (PHSO). In 2024-25 we received five formal complaints which were investigated, with none being escalated directly to the PHSO.

Responding to public correspondence

The majority of correspondence we receive relates to concerns about the rail industry and the strategic road network. ORR is represented at the cross-government complaint handlers' forum and the DfT complaint handlers' working group.

We aim to respond to 95% of all such enquiries within 20 working days of receipt, excluding safety cases which can often take longer than 20 days to investigate due to the complexity of often multi-part enquiries. We aim to respond to 100% of freedom of information requests withing 20 working days or within a permitted extension deadline.

Performance indicator	2024-25	2023-24
No. of general enquiries and complaints received	1,419	1,232
% cleared within 20 working days	98%	97%
No. of freedom of information requests received	156	135
% responded to within 20 working days or within the permitted extension deadline	100%	99%

Smarter regulation/regulatory reform

In May 2024 Government issued the White Paper titled, 'Regulation for innovation, investment and growth: working with regulators to deliver a world-class service'.

One of the reforms within the White Paper was the introduction of the Growth Duty Performance Framework which aimed to enhance transparency and provide accountability for the year-on-year performance of regulators. In August 2024, we submitted our report to the Department for Business and Trade demonstrating how we take account of the growth duty when delivering our health and safety regulatory work, and we continue to look for opportunities to improve and streamline the regulatory framework and our supporting processes.

This year also saw the development of the government's growth mission and regulatory reform agenda. We responded to the Prime Minister's December 2024 letter calling on regulators to propose reforms that will boost economic growth. Our pledge, 'conduct a deep dive into the rail network investment framework with the rail supply chain to encourage direct investment into railway infrastructure' was outlined in a 31 March 2025 government policy paper titled 'New approach to ensure regulators and regulation support growth'. This pledge is included in our 2025-26 business plan as a Q1 deliverable, along with other deliverables linked to the reform of regulators.

From January 2025 we responded to a number of regulatory reform related commissions which supported our sponsoring department, the Department for Transport, with ongoing assessments of our regulatory roles and functions.

With more announcements on regulatory reform and the growth mission due in the coming year, we will continue to support with these requests.

Throughout the year, we worked collaboratively with other economic regulators, principally through the UK Regulators Network (UKRN) of which we are an active member.

Fraud prevention

We have a fraud prevention policy that ensures all employees understand how to prevent fraud and what to do if they suspect that fraud may be taking place. The policy sets out employees' responsibilities under the Fraud Act 2006, the Bribery Act 2010 and the Public Interest Disclosure Act 1998, as well as under Managing Public Money. The policy is reinforced through ORR's conduct

and discipline policies. We have assessed ourselves against functional standard GovS 013 Counter Fraud and consider that we comply with all mandatory elements. No incidents of fraud or bribery have been identified in 2024-25. Fraud awareness training was provided to all members of staff in corporate functions during the year.

Engagement with Parliament

We are accountable to the House of Commons' Transport Select Committee and the courts for our role as an independent health and safety and economic regulator of the railways and in our role as the regulator of National Highways in England. Our parliamentary accountability manifests itself practically in several ways, including the appointment of our Chair being subject to scrutiny by the Transport Select Committee and senior officials regularly contributing to parliamentary committee inquiries.

This year we have contributed to the parliamentary process at Westminster by giving oral evidence to the committee on rail reform.

We offer expert and impartial information and advice to governments and parliamentarians, including members of the Welsh and Scottish Parliaments, to inform their scrutiny of rail and road issues. This year we have met with staff from the Transport Select Committee; the research and information service based in Parliament to assist MPs and their staff, on several occasions; and with members of staff from the House of Commons library. We also provide independent assessment of delivery across key transport strands. We actively engage with parliamentarians on issues which are of interest to them and their constituents through briefings, correspondence, and proactive engagement. In 2024-25 we met with a number of parliamentarians from across the political spectrum. We hosted a parliamentary drop-in event at Westminster which all MPs and Peers were invited to as well as relevant members of staff, and two online webinars explaining rail industry financials for all parliamentarians – one focused on the UK financials and one with a Scottish focus. We also produced four parliamentary newsletters which went to all MPs and Peers.

John Larkinson
Accounting Officer
8 July 2025

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- → Next Accountability report: Corporate governance report