OFFICE OF RAIL AND ROAD

A review into our rail industry-facing service standards

26 September 2025

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1. Introduction

1.1 In March 2025 HM Treasury (HMT) published its policy paper A new approach to ensure regulators and regulation support growth, which included a commitment to reduce bureaucracy for businesses and cut administrative costs for business created by regulation by 25% by the end of Parliament.

1.2 As part of this work, ORR has engaged with the rail sector to review our industry-facing service standards to check they are relevant and challenging, and whether other standards would be useful. This report is the culmination of that review. It meets the commitment set out in our current Business Plan and is in line with our Q2 publishing commitment which was agreed with the Department for Transport (DfT) and the Department for Business and Trade (DBT).

1.3 This review of service standards sits alongside three other ORR projects:

(a) Seeking to reduce by a quarter over the next five years the administrative burden of our regulation and monitoring on London St Pancras Highspeed and National Highways by reviewing our policies and data and information requirements. This will support our duty to ensure that we are acting in a proportionate and targeted way while effectively fulfilling our statutory roles.

(b) Engagement with Network Rail to identify and implement opportunities to increase the effectiveness and efficiency of how the railway delivers for its stakeholders, ensuring we are using resources in ways that add most value. A letter is on our website.

(c) A deep dive into the rail network investment framework with the supply chain to encourage direct investment into railway infrastructure.

1.4 As an organisation focused on delivering high quality, impactful regulation, ORR keeps its processes and practices continuously under review. This review builds on the work that we have already done to improve our performance. Reflecting this, some of the commitments cited within this report were already underway at the start of the project.

1.5 Finally, it is important to note that the rail reform programme and the creation of Great British Railways (GBR) will lead to changes in what we do and how we do it. These changes will enable further opportunities for us to review our approach to regulation, consider how we can continue to have a tangible effect on driving growth and investment, as well as tackle the complexity and burden of regulation.

2. Our current rail industry-facing service standards

2.1 The provisions and service standards that we committed to for 2025 to 2026 are outlined in our Business Plan. These also include a range of provisions and standards that do not face the rail industry. Our 2025 to 2026 rail industry-facing service standards are outlined in Table 2.1 below.

Table 2.1 Rail industry-facing 2025 to 2026 service standards

Number	Provision	Current standard
1	Issue new or revised train driving licences	100% of applications decided within one month of receipt of all necessary documentation
2	ROGS safety certificates and authorisations (Railway and Other Guided Transport Systems Regulations)	100% decided within four months of receiving completed application
3	Report to the Rail Accident Investigations Branch (RAIB) on the progress of its recommendations	100% response to RAIB recommendations within one year of associated RAIB report being published
4	Efficient processing of technical authorisations	100% of responses within 28 days of receiving complete submission
5	Approve the Accessible Travel Policy of a new licence holder	100% approved within six weeks of receipt of all relevant information
6	Track, station and depot access applications	100% decided within six weeks of receipt of all relevant information
7	Operator licence and licence exemption applications	100% decided within two months of receipt of all relevant information
8	Market Studies	100% of interim market study reports published within 6 months of launch of market study 100% of final market study reports published within 12 months of launch of market study

2.2 As a result of this review, and in addition to the new service standards identified later in this report, we will re-word two of the standards to more accurately reflect the process they relate to. The new wording will be in our 2026 to 2027 Business Plan.

- Row 4: 'Efficient processing of technical authorisations' will become 'Efficient processing of *interoperability* authorisations'.
- Row 6: The wording of the track, station and depot access applications provision will change to reflect our track access application guidance. This change will be: '100% of applications will be decided within six weeks of receipt of all relevant information *for uncontentious or supported applications (12 weeks for contentious or unsupported applications).*'

3. Process of the review

3.1 The approach we took to the review was:

(a) Comparative research into our regulatory peers

(b) Engagement (both internal and external)

(c) Amending our service standards

Research into our regulatory peers

3.2 We reviewed performance reporting across a number of regulators including:

- Ofgem
- Ofwat
- Health and Safety Executive
- Civil Aviation Authority
- Medicines & Healthcare Products Regulatory Agency

3.3 For each regulator, we considered the number of service standards or key performance indicators they have, the detail of what is being measured, the annual target and the performance against them as a comparison to our own.

Engagement

3.4 We adopted a collaborative approach to undertaking this review. We gathered internal and external stakeholder feedback on our current rail industry-facing service standards as well as proposals for improving or strengthening them. We also asked for ideas and opportunities in relation to new rail industry-facing service standards.

Internal

3.5 We engaged with internal colleagues across the organisation. This included meeting with rail industry-facing service standard owners and teams whose work is directly or indirectly related to service standards.

External

3.6 We engaged with DfT and with representatives from the rail sector, including:

- Freightliner
- London St Pancras Highspeed
- Network Rail
- Rail Delivery Group
- Railway Industry Association
- South Western Railway

Amending our service standards

3.7 Following the process of gathering feedback, we outlined a list of proposals that were either direct amendments to current standards or improvements to the process that underpins them or new standalone standards. We considered the potential benefits of each proposal focussing mainly on the benefits to the stakeholders involved. We took into account the feasibility of overcoming any significant barriers such as risks, legal barriers and resource constraints.

3.8 We met with relevant internal teams associated with the service standard proposals to secure buy-in and through following our governance process turned the proposals into commitments.

Categorising our commitments

3.9 We have 15 new rail industry-facing service standard commitments. We have categorised these into different timescales:

- Already in progress
- Short term
- Longer term
- Legislative changes

3.10 In chapter eight we have outlined some future opportunities which are not yet commitments but could be explored further.

Next steps

3.11 We will review the progress of implementing these commitments after 12 months.

4. Already in progress commitments

4.1 The commitments within this chapter are categorised as 'already in progress'. This means work has begun on delivering them.

Service standard: efficient processing of technical authorisations

Commitment

4.2 Reduce the Service Level Agreement (SLA) for infrastructure authorisations from 28 to 21 days upon receiving a complete submission.

Description

4.3 Our current service standard in this area is 100% of technical (interoperability) authorisation responses for new, major, upgraded or renewed infrastructure or rolling stock projects will be processed within 28 days of receiving a complete submission.

4.4 We have identified that we can improve on this processing time for infrastructure authorisations and reduce the number of days it takes us to complete this to 21 days for any applicants who pre-engage with us.

4.5 We will notify applicants of the reduced SLA for the review of applications following submission of a complete technical file including associated signed off endorsements from accredited assurers and Network Rail's Safety Review Panel (SRP) and the Network Rail Assurance Panel (NRAP).

Benefits

4.6 Reducing the SLA places more emphasis on the applicant getting their submission correct first time and reduces additional burden through extra assurance work and engagement with DfT relating to non-compliance. The applicant currently plans a four-week period on their project plan for ORR's review before taking into service. Revising this period to three weeks will provide time saving benefits to the applicant.

Timescales

4.7 We will implement this change to the service standard for infrastructure authorisations from January 2026.

Service standard: issue new or revised train driving licences

Commitment

4.8 Continuously improve our new portal for train driving licence applications. Additionally, work with all operators to ensure that known burdens arising from the requirements under Train Driving Licences and Certificates Regulations 2010 (TDLCR) are reduced as far as possible.

Description

4.9 Our current service standard in this area is that 100% of applications for new, renewed or revised train driving licences will be decided within one month of receipt of all necessary documentation. Applications are made to us by train driver's employers using an online 'portal'.

4.10 Although we do not plan to amend the service standard directly to reduce this timescale (which is set for us in the TDLCR), we have committed to continuously improve the new portal we launched in early August 2025.

Benefits

4.11 The latest version of the portal already makes changes which improve the efficiency for making applications to us in particular allowing operators to do much more online.

4.12 Importantly, we also know that there are some requirements under TDLCR that create known administrative inefficiencies, such as the need for operators to tell us about all 'passed' medicals, not just those which are failed. We are committed to working with operators to provide them with the maximum amount of flexibility within the current regulations to reduce administration, ahead of plans by government for legal reform of the entire regime.

Timescales

4.13 We will be asking for feedback from all portal users later in 2025 to find out what further improvements could be made for their benefit.

Service standard: track, station and depot access applications

Commitment

4.14 Enhance the useability of our track access guidance.

Description

4.15 Our current service standard in this area is 100% of uncontentious or supported applications for track, station and depot access will be decided within six weeks of receipt of all relevant information (12 weeks for contentious or unsupported applications). This remains appropriate and we do not propose to amend it.

4.16 Our current track access guidance is split into topic-based modules. This year we will improve its accessibility by creating a smaller number of documents that more closely align to a users' experience of the access process. Information will be more readily located, and the ability to cross reference processes improved.

Benefits

4.17 This will improve the process for train operating companies and Network Rail by producing a consolidated simplified version of the guidance that is easier to understand. This improves the quality of information we give our regulated entities.

Timescales

4.18 The changes will not alter current policy or introduce new policy. We do not envisage a need to consult prior to publishing these documents in autumn 2025.

Service standard: track, station and depot access appeals

Commitment

4.19 100% of access appeals will be decided within six weeks of receipt of all relevant information.

Description

4.20 Currently, we determine access appeals made to us under Regulation 32 of the Access & Management Regulations within a predetermined and reasonable time which is within six weeks of the date of receipt of all relevant information.

4.21 We feel that we can go one step further and make this a service standard commitment. This will be included in our next business plan.

Benefits

4.22 This helps us to provide transparency to appellants in relation to how long the appeals process will take upon receipt of all relevant information.

Timescales

4.23 We intend to implement this new service standard and track our progress on it immediately.

Service standard: approve the Accessible Travel Policy (ATP) of a new licence holder

Commitment

4.24 Reduce the processing time for approval of an Accessible Travel Policy of a new licence holder from six to four weeks upon receipt of all relevant information.

Description

4.25 An ATP sets out, amongst other things, the arrangements and assistance that an operator will provide for disabled people and passengers with reduced mobility using its services.

4.26 Our current service standard in this area is 100% of Accessible Travel Policies of a new licence holder will be approved within six weeks of receipt of all relevant information.

4.27 We have identified that we can improve on this processing time for approval of an Accessible Travel Policy of a new licence holder and reduce the number of weeks it takes us to complete this to four weeks.

Benefits

4.28 This commitment will benefit new licence holders by reducing the time they need to allow for their Accessible Travel Policies to be approved and so for operations to begin.

Timescales

4.29 We have implemented our new processing time expectation already and all Accessible Travel Policies will now be subjected to the reduced timescale.

Service standard: ROGS safety certificates and authorisations (Railway and Other Guided Transport Systems Regulations)

Commitment

4.30 100% of authorisations to be published (including exemptions) against a target of five working days.

4.31 100% of expired authorisations (including exemptions) to be removed from the website against a target of five working days.

Description

4.32 Currently, we publish safety authorisations (including exemptions) as soon as is practically possible factoring in competing priorities and other Business as Usual work.

4.33 We feel we can strengthen our approach in this area by committing to a new standard associated with the service provision of ROGS safety certificates and authorisations. We plan to formalise current best practice arrangements by turning this practice into a service standard.

4.34 We also commit to removing expired authorisations or exemptions from our website to the same timescale of five working days.

Benefits

4.35 The benefits of this will be greater transparency for duty holders and external stakeholders.

Timescales

4.36 We intend to implement this commitment with immediate effect.

Service standard: ROGS safety certificates and authorisations (Railway and Other Guided Transport Systems Regulations)

Commitment

4.37 Review the ROGS assessment manual in our Quality Management System (QMS) manual to consider our approach to assurance in this area.

Description

4.38 Our current service standard in this area is 100% of ROGS safety certificates and authorisation applications will be decided within four months of receiving a complete submission.

4.39 Although we do not plan to amend the service standard directly to reduce this timescale, as part of a business plan commitment we will review the QMS manual to look for opportunities to improve our approach to assurance.

Benefits

4.40 This commitment will provide greater clarity of internal processes and improve processing efficiency.

Timescales

4.41 We intend to implement this review by 1 April 2026 (to cover the review of the assessment criteria to ensure they strike the appropriate balance between statutory compliance without over-excessive evaluation i.e. a targeted and proportionate review to meet statutory requirements and no more).

Service standard: Competition complaints

Commitment

4.42 100% of competition complaints will receive an initial response within ten working days. This response may include acknowledgement, referral to our guidance, and/or an outline of next steps, depending on the nature of the complaint.

Description

4.43 This is currently not a service standard, however we are proposing it as a new service standard relating to our competition role.

4.44 On 22 September we published our refreshed Competition Act 1998 guidance which included a target date of ten days to provide an initial response to a competition complaint.

4.45 Our initial response to a competition complaint may:

- acknowledge the complaint;
- refer the complainant to relevant parts of our guidance; and

- provide any other information which could include outlining our next steps to investigate the complaint further.

4.46 A competition complaint would satisfy all of the following criteria:

- Alleges anti-competitive conduct (e.g. abuse of dominance, collusion, exclusionary practices);
- Relates to a market or service in which ORR has competition powers;
- Is submitted by a party with a commercial or consumer interest in the market; and
- Requests or implies a regulatory or enforcement response under competition law or sector-specific powers.

Benefits

4.47 The benefits of this new service standard to competition complainants will be to ensure that ORR acts swiftly to address potential market distortions, reinforcing trust in its regulatory oversight. This commitment enhances transparency and accountability, providing stakeholders with greater confidence in the fairness of rail sector competition.

Timescales

4.48 We intend to implement this new service standard immediately.

5. Short term commitments

5.1 The commitment within this chapter is categorised as short term, which means it could be delivered within a 12–24-month period.

Service standard: ROGS safety certificates and authorisations (Railway and Other Guided Transport Systems Regulations)

Commitment

5.2 100% of exemptions to be processed within four months of receiving a completed application.

Description

5.3 There is no statutory timeline to complete exemptions, and we receive small numbers of exemption applications annually (under ten). Currently, we aim to process safety exemptions within four months to align with the ROGS safety certificates and authorisations processing time.

5.4 Our guidance refers to a four-month window already in which ORR will assess an application for an exemption, so committing to this new standard would be confirming what we are already doing in practice.

Benefits

5.5 This commitment will clarify the expectations for processing exemptions and provide consistency with ROGS Safety Certificates and Authorisation timelines.

Timescales

5.6 We intend to implement this commitment by 1 April 2026 starting with new exemption applications.

6. Longer term commitments

6.1 The commitments within this chapter are categorised as longer term which means that they could be delivered beyond a 12–24-month period.

Service standard: track, station and depot access applications

Commitment

6.2 Web-interface based submission process for access applications and/or appeals (including basic completeness checks).

Description

6.3 We recognise that there is the opportunity to improve and update our current submission process to digitise it. We currently have some data mapping work underway to help us understand what options are available and how data is currently used and processed in relation to access applications and appeals.

6.4 We are also exploring whether we can link the process of submitting a digital application or appeal to the publication of applications or appeals to improve the administration and visibility of that information.

Benefits

6.5 Digitising the submission process could reduce the amount of manual handling of data and speed up our process. This would benefit applicants by reducing the time it takes for them to pre-engage with us and provide all of the relevant information that we need in order to make a decision. It could also improve access to Management Information (MI) data (e.g. to track performance of regions, other service standards such as case processing time etc).

6.6 Implementation of any solution must be compatible with our future appeals role under reform.

Timescales

6.7 We intend to begin developing requirements in autumn 2025 with a view to securing budget to develop the solution in 2026, subject to higher priority work.

Service standard: track, station and depot access applications

Commitment

6.8 Implementation of a digital process to automatically publish representations related to access applications for new, disputed contracts (section 17), disputed amendments to contracts (section 22A) and appeals.

Description

6.9 Section 17 access applications relate to decisions on new contracts where Network Rail and the train operator could not reach an agreement, and section 22A access applications relate to amendments to contracts where the same applies. ORR also receives appeals under the Network Code and The Access and Management Regulations.

6.10 Currently, representations are published by ORR as soon as practically possible with factors such as quality, accessibility, formatting, commercial confidentiality and General Data Protection Regulation (GDPR) related redactions taken into account.

6.11 Copies of the representations are emailed to the relevant party as soon as practically possible, to enable them to send their responses in. We recognise that other parties may also have an interest and want to send their responses in, so it is important to publish representations in a timely manner.

6.12 We are committed to exploring a digital process which would automatically publish representations related to access applications for new, disputed contracts (section 17), disputed amendments to contracts (section 22A) and appeals.

Benefits

6.13 This would improve transparency for on interested parties as they would gain access to other representations as soon as they were automatically published allowing their representation to reflect comments made by another interested party.

Timescales

6.14 We intend to commit to exploring this further as part of the web-interface based submission process work.

Service standard: ROGS safety certificates and authorisations (Railway and Other Guided Transport Systems Regulations)

Commitment

6.15 Explore the potential to create a digital portal for ROGS safety and authorisation applications and/or explore options to improve the ROGS guidance.

Description

6.16 We are already exploring digitisation of processes associated with service standards for train driving licencing applications and track, station and depot access applications as referenced earlier within this report.

6.17 We plan to use some of the good practice learning from these digitisation projects to explore the potential of creating something similar for ROGS safety and authorisation applications.

6.18 We also commit to exploring options of how to improve the ROGS guidance for users.

Benefits

6.19 The benefits of this are the creation of a one-stop-shop for duty holders, moving away from e-mail exchanges and spreadsheets, to a more modern, ‘digital approach'. We expect this to bring consistency and efficiency benefits too.

Timescales

6.20 We intend to explore options as part of ORR’s wider digital strategy.

7. Legislative change commitments

7.1 The commitment within this chapter requires legislative change. As such, this work would have to be led by DfT with our support.

Service standard: Issuing new or revised train driving licences

Commitment

7.2 Support the review and reform of the Train Driving Licences and Certificates Regulations (TDLCR) 2010.

Description

7.3 TDLCR 2010 (and associated legislation) set a common administrative regime for the training, examination and monitoring of drivers, as well as the conditions for gaining and maintaining a valid train driving licence. ORR is the issuing authority for train driving licences and has to consider and determine applications within one month of receipt of all required information.

Benefits

7.4 In the last few years, we have improved the efficiency for issuing, renewing and updating licences via our new online portal. We've also clarified roles and processes in our guidance and, wherever possible, increased our administrative efficiency. More substantial improvements to the licensing and certificate regime for train drivers will firstly require legal changes to TDLCR.

7.5 To help achieve this, we are working with the DfT on plans to reform the regulations which build on the 2023 DfT Post Implementation Review exercise which found strong evidence from unions, operators and others for change in many areas.

Timescales

7.6 In its 2025 consultation on rail reform legislation, the Government outlined plans to introduce a permanent power for the Secretary of State to update, amend or revoke provision in the TDLCR, to address a gap in regulatory powers resulting from EU exit. This power is expected to be introduced via the forthcoming Railways Bill, expected to be laid in Parliament later in 2025 and will allow the Government to amend and update TDLCR as necessary.

7.7 The next steps are for DfT to explore the changes that would remove these known burdens and costs and create a regime that is fit for the future. This may include a government public consultation at some point in 2026.

8. Future opportunities

8.1 This chapter contains proposals to be explored in the future with a view to creating new or amending current service standards.

A new key performance indicator (KPI) on fatal accident investigations

Potential commitment

8.2 A new KPI on fatal accident investigations.

Description

8.3 We are currently exploring the possibility of introducing a new KPI in the sensitive area of fatal accident investigations which requires careful consideration.

8.4 Our next steps are to carry out a feasibility study to examine the practicalities of developing a KPI in line with our current policy of conducting initial enquiries into all railway related fatalities (which includes trespass and suicides).

8.5 We will learn from the Health and Safety Executive (HSE) experience, who have committed to a KPI and start the 12-month measure from the point of obtaining investigation primacy.

Benefits

8.6 The benefits of this new KPI would be recognition of the impact of work-related deaths on families and businesses and the need to progress these as quickly as possible. It also demonstrates a public commitment to securing justice and ensuring any lessons learned are identified and shared at the earliest opportunity.

Timescales

8.7 We aim to do a feasibility study in 2026-27.

ORR's role as an appeals body for Great British Railway (GBR) decisions

Potential commitment

8.8 To explore potential new service standards on processing GBR appeal applications within a certain timescale upon receiving all relevant information.

Description

8.9 Under rail reform, ORR's role will change. One proposed change is for a new role in the appeals space for GBR decisions (our role on appeals for other Infrastructure Managers will stay the same).

8.10 The details of this policy are still being explored and will be consulted on after Royal Assent of the Railways Bill.

8.11 We recognise that it may be beneficial to appeal applicants to establish indicative timescales of how long the appeals process might take and will explore this as our policy develops. It is possible that legislation may include indicative timescales for ORR to work towards.

Benefits

8.12 Providing service standard commitments in this area could provide transparency to appellants in relation to how long the appeals process will take upon receipt of all relevant information.

Timescales

8.13 We will continue to explore our new appeals role (and engage with industry) throughout the rest of 2025 and 2026 whilst the Railways Bill passes through Parliament. It may take some time to determine whether appeal service standards would be appropriate, and if so, for feasible but stretching service standards to be generated given that this is a change in role for ORR and a new structure for the rail industry under GBR.

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