

Annex C: Progress against RDG commitments

Commitment 1 – Revise Accreditation Mandate

1. In January 2019, RDG delivered a revised Accreditation Mandate which was published on RDG accreditation website.¹ This Mandate clarifies the purpose of RDG accreditation.
2. RDG also developed a new approach to governance of non-accredited retail systems to address issues with suppliers failing to comply with the standards (see Commitment 5 below for details of this approach).
3. In addition, RDG has published a list of ‘Accredited Suppliers’ on the RDG website. This is updated regularly by RDG ahead of their bi-monthly governance meetings.

Commitment 2 – Update RDG website

4. In December 2018, RDG updated its website² to provide a simple and easily accessible overview of accreditation, helping new entrants, in particular, to engage with and gain an understanding of the process that they will need to follow to become accredited.
5. The website features an FAQs section and an ‘Accreditation Video’ which explains what accreditation is, why it is necessary, and the steps to go through to gain accreditation.³ Initial feedback suggests that the video has been very helpful.
6. ORR recognises the improvements made to the RDG website and that the information available for TIS suppliers is much clearer, and presented in an accessible way (written in plain English, no more than one-click away from the home page and also presented via a video).

Commitment 3 – Improve Onboarding Guidance

7. To provide new entrants with clearer information about the RDG accreditation process, RDG reviewed its existing guidance and developed a new guidance

¹ <https://www.raildeliverygroup.com/our-services/rdg-accreditation.html>

² <https://www.raildeliverygroup.com/our-services/rdg-accreditation.html>

³ <https://vimeo.com/315608645>

document. RDG also developed workflows and templates which are available via the Accreditation section on the RDG website.⁴

8. ORR considers that this revised guidance is more accessible and provides better support for new entrants.

Commitment 4 – Create Pre-accreditation Process

9. To promote earlier engagement between new entrants and the RDG accreditation team, in September 2018, RDG put in place a pre-accreditation process. RDG has appointed an Accreditation Support Manager who is now leading in this area and working closely with the RDG Licensing team so there is clarity over what a new entrant is being licenced to retail and what that would involve in terms of applicable compliance standards and accreditation.
10. RDG have also set up an internal cross-function steering group which includes both commercial and technical RDG stakeholders. This group meets regularly to discuss innovative ideas brought in by TIS suppliers. RDG has said that this has improved the way in which it engages with emerging developments for which industry compliance standards need to be developed.

Commitment 5 – Review Governance of Standards

11. Following a consultation with stakeholders, RDG published a new approach to governance of standards.⁵ It covers the development and update process for RDG standards, governance, document naming, and internal RDG monitoring and management processes.
12. As noted above, RDG have also set up an internal cross-function steering group which includes both commercial and technical RDG stakeholders. One of the purposes of this group is to identify a person responsible for governance of each particular industry compliance standard.

Commitment 6 – Review Standards

13. To address concerns that standards and tests are perceived to be confusing, duplicated and/or go further than necessary, RDG carried out a review of all of its standards. RDG completed this review in October 2018. RDG concluded that while the standards are fit for purpose, not all standards are applicable to all retailers, as

⁴ <https://www.raildeliverygroup.com/our-services/rdg-accreditation/accreditation-guidance.html>

⁵ The approach is set out in Standard RSPS 9000. RSPS 9000 can be found in Assist, the RDG Accreditation and Standards portal.

their retail offerings may differ. At present, all retailers (including new entrants) are required to accredit against all standards even if they do not use them.

14. RDG is working to introduce a more bespoke approach where standards are categorised and retailers only need to accredit against a set of standards specific to their retailing activities. This is likely to make accreditation easier and potentially cheaper and ensure a more appropriate level of accreditation. RDG is looking to complete this workstream in the next 12-24 months.

Commitment 7 – Pilot Streamlining Testing

15. Earlier this year RDG renewed their existing test library and is continuing to develop and refine the library to make it easier for TIS suppliers to maintain compliance. RDG has removed the requirement for suppliers to share their ongoing regression testing with RDG, which could save suppliers up to a week of time and cost on a major accreditation.
16. RDG has also reviewed the process in relation to accrediting downstream clients of Third Party Retailers (“TPR”).⁶ RDG has removed the requirement for downstream clients to be accredited if the TPR is accredited. The TPR takes responsibility to ensure its downstream clients are compliant with standards. This should also save time and cost.

Commitment 8 – Pilot Retrospective Accreditation

17. Initially, RDG committed to develop a proposal for retrospective accreditation. However, during the market study, RDG considered that an ongoing annual approach would be better suited to agile software development models which underpin modern retailing solutions. Retrospective accreditation would not address the key issues with accrediting on a three year cycle, particularly the large burden on suppliers and the pace of change industry wants to see in the market.
18. Under the ongoing annual accreditation approach, retailers are accredited on an annual basis only against the industry standards that have changed in the preceding year. This approach is more dynamic and is likely to save time and cost for suppliers.
19. RDG has commenced an 18-month trial with three suppliers to test the process, and highlighted that new entrants can move onto this approach once they complete their initial accreditation.

⁶ Such as the Trainline and Raileasy

Commitment 9 – Drive Continuous Improvement

20. RDG has put in place a continuous improvement regime to ensure that RDG embed the new ways of working into the organisation.

Accreditation surgeries

21. RDG introduced accreditation surgeries for new entrants to obtain free advice on accreditation and what it takes to become accredited. RDG held three accreditation surgeries.⁷
22. Experience and feedback from these surgeries has now led RDG to hold individual meetings with suppliers as some were reticent to share their ideas in an open forum. RDG now has engagement with 49 suppliers across all rail retail systems and of that number 14 were new to the process in the last 12-18 months and are presenting a number of different approaches to retailing rather than the traditional approach to retail channels and products.

Compliance mark

23. RDG is developing thinking in relation to the level of ongoing compliance that a retail system has at any given time by implementing a mark which confirms the current level of compliance. This would mean that systems with a 'gold' accreditation mark would be fully compliant with all current industry compliance standards, whilst 'silver' and 'bronze' marks would require lesser levels of compliance. This would provide retailers and suppliers with some flexibility in this area, whilst a 'bronze' level of compliance would still be providing train companies and customers with a sufficient level of assurance in respect of the retailing system they are using. RDG aims to complete this workstream in the next 12 months.

Stakeholder feedback

24. We received five responses to our request for feedback. Overall, the feedback from stakeholders has been positive.
25. The evidence gathered from existing TIS suppliers and potential new entrants shows that RDG accreditation process is less complex. For example, one stakeholder said that: *"These mandate and standards are evolving constantly and with each revision the complexity is reduced with further clarifications to the subject matter."*

⁷ The first one was held 23 November 2018, attended by two potential new entrants, with a subsequent one held 11 January 2019 attended by an existing supplier. A further surgery was held 22 February 2019 attended by a new potential entrant.

26. Feedback also shows suppliers are pleased with the removal of the mandatory three year accreditation. For example, one stakeholder said *“The one major reform that has been gratefully received by all suppliers is the removal of the mandatory 3-year accreditation that was both time consuming and expensive.”*
27. Two stakeholders have noted lack of communication from RDG about the changes being introduced with one stakeholder saying: *“No-one has communicated any changed mandated to us”*. RDG said that it has shared progress on the various workstreams with its members through periodic governance meetings and with suppliers through regular accreditation planning meetings. It has also published updates on its website. RDG acknowledged that it can be challenging to ensure a consistent engagement across such a large and varied number of interested parties, but said they are committed to improving how they interact with them.
28. Overall, we are satisfied with RDG’s delivery of the nine commitments and the positive impact it has had on the industry. However, we will take into account stakeholders’ comments about RDG communication and support issues and we will work with RDG towards continuous review and improvement of RDG accreditation.



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