



campaigning
by the
Railway Development
Society Limited

Policy Committee

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Dear Philip,

ORR's approach to transparency - a consultation

We are pleased to submit this consolidated national response on behalf of Railfuture, which has been prepared by the Policy Committee.

Railfuture is a national voluntary organisation structured in England as twelve regional branches, and two national branches in Wales and Scotland.

National Rail Trends Portal

Q1: We would like to hear consultees' views on the content and functionality of the NRT Portal. For example:

• Is our strategy of publishing official statistics and other key performance metrics, while encouraging the industry to publish everything else, the right approach?

The approach is welcomed but there needs to be a direct link to the data provided by other parts of the industry to link the sources together.

• Is the NRT Portal an appropriate dissemination method for rail statistics?

Subject to suitable links to other industry data this appears to be a suitable method.

• Does the current content and functionality meet users' needs, and if not, how can it be improved?

There is sometimes a lack of granularisation (e.g., no breakdown of journey information to train service groups and detailed statistics masked by certain services – such as Southeastern Highspeed).

• What role should other industry bodies and third parties (for example application developers, passenger bodies and rail companies) play in the dissemination of rail statistics?

Data sources should be linked via a central register to help identify what is available.

• Are the reasons set out in chapter 2 for us having a continuing role in the publication of data and information the right ones?

There does need to be a central role in monitoring the provision and quality of published data. Problem areas do need to be highlighted and further work identified to improve or replace the data sources.

www.railfuture.org.uk www.railfuturescotland.org.uk www.railfuturewales.org.uk
www.railwatch.org.uk

ORR's own processes

Q2: We are interested to hear views on what other areas of our work consultees believe should be published and why.

We believe there is a case for more financial information to be available on the cost of running the rail industry. This would help influence more of the decisions and responses to consultation. Comparison of similar costs will highlight the need for action in some areas.

Safety

Q3: We would be interested to hear consultees' views on our proposals around the publication of the results from our safety inspections and reports on the comparative performance of duty holders from our audit and inspection activities.

Safety information appears to be largely pitched at the right level. However direct links to more detailed reports on lessons learnt and agreed actions would make the process more accountable and spread good practice (and warn of suspect practice).

Q4: We would also be interested to hear views on the benefits and otherwise of duty holders reporting on best practice by the publication of specific KPIs.

KPIs provide a good level of summary data but may be misleading when the 'devil is in the detail'.

Network Rail initiatives

Q5: We would be interested to hear consultees' views as to the potential use that could be made of Network Rail historic performance data. In particular the extent to which this data provides a means by which the market, via third party developers, could meet consumer demand for real time train information products and services and/or information about performance at even more disaggregation than the current route sector publication. (Page 29)

Opening up data sources has dramatically improved the quality and provision of real time data. There are often examples of where this data is ahead of the Customer Information Systems (CIS) at many stations. However there is likely to be a limited value of historic performance data to passengers due to the variability of the sort of incidents that occur on the network (historic data may not be an indication of future performance). However we would expect rail industry partners to prioritise action around negative trends and groups of negative data.

Q6: In what areas of its business could Network Rail, in your view, become more open, and what information or data would you like to see made available as a result?

We are pleased to see the approach of Network Rail in openness and transparency. A clear statement of which decisions will be/are/or were taken will help groups in preparing the case for further improvements in services. Too often the financial costs involved may be hidden behind commercial confidentiality and we would like to see more openness on the cost of projects and services become the norm.

The sector – our and industry initiatives

Q7: We are interested in hearing views on the scope of our and industry activities; whether the sector is moving in the right direction; whether the pace is right; and whether there are other areas that consultees believe would benefit from greater transparency and why.

We would support the view that the industry is heading in the right direction but we still find it hard to identify the real costs of running the service. We have sought to get information about the tax implications for the rail industry for some time as there is concern about the perceived level of money that goes back to the Treasury across the industry, this is excluded from the cost of running the railway and gives rise to the perception that the industry is very expensive to run.

The legal framework

Q8: We are interested in consultees' views on the use of our statutory powers and how they believe they could be applied in the context of transparency.

Although we would normally expect statutory powers to be used to ensure transparency and provision of relevant and correct data, we would be concerned if any regulatory fines or incentives were passed onto the passengers.

Accessibility and data integrity

Q9: Presentation of the data or information is key and we would like to hear views as to the likely risks and pitfalls and how best to address them.

There is probably a good case for the production of source data that can be used by others to interpret – although this can lead to inconsistency and error. A standard reporting model should enable some consistency.

Appraising the costs and benefits

Q10: We would be interested to hear of any other initiatives in the sector or elsewhere where transparency has resulted in positive change.

No response.

Q11: We are also interested in hearing about the risks and any unintended consequences.

The cost of producing the data should be minimised and optimised wherever possible. Priority should be given to accessing existing data sources automatically wherever possible – and perhaps providing a cost effective centralised process rather than requiring additional manual intervention.

There is also a danger that the elements of the rail industry could be driven to improve the statistics provided even when this could be at the cost of a quality service.

Q12: Consultees views are sought on how we should go about evaluating the risks and benefits of more transparency and what factors we should take into account, including how we should measure whether our objectives for transparency are being achieved.

There does need to be a process for monitoring the access to data even if just a numeric value rather than detailed access by user – although detail might be useful if certain data is accessed by a limited group and they can be contacted if required to identify the uses that the data is being used for. There may be examples where the cost of collection becomes too high without any value.

KPIs could be published on the data sources provided and the use that is being made of them – although even one access could be extremely useful to the user and no access now might be a very valuable service later.

We trust you will find these comments of use.

Yours sincerely,



Chris Fribbins
Railfuture – Policy Committee