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Dear Caroline

ORR opinion (under our Managing Change Policy) on Network Rail's reporting of passenger satisfaction on scorecards

Thank you for your letter dated 08 September 2021 outlining Network Rail's proposed change for measuring passenger satisfaction on scorecards, which involves replacing the National Rail Passenger Survey (NRPS) with Wavelength as the data source for the overall passenger satisfaction measure.

ORR recognises that changes can occur during the control period, which may impact region and/or System Operator (SO) accountability and funding. Therefore, we developed our [Managing Change Policy](#) to ensure any changes relative to region or SO settlements, set in ORR's [Final Determination](#), are managed appropriately – balancing the need for Network Rail to respond flexibly to changing circumstances and providing greater certainty to the regions and SO (and their customers and funders) whilst ensuring accountability for the delivery of CP6 commitments. Our policy also supports us in comparing regions' performance, across CP6 and beyond. Network Rail is required, under its [Network Licence](#), to comply with this policy.

As noted in your letter, this change is classed as a Level III Relevant Change under ORR's Managing Change Policy and requires an ORR opinion, which is set out in this letter.

Timings

This change has already been applied to the 2021-22 scorecards and ORR's opinion is now being sought retrospectively.

Some working level discussions took place prior to the start of financial year 2021-22 as issues over NRPS data availability were apparent then and it was agreed this was a relevant change in May 2021. However, Network Rail only provided its formal letter



to ORR in September 2021. We acknowledge that it was not possible to provide the formal letter in advance of the change being included in 2021-22 scorecards, but we are disappointed in the lack of timeliness. We encourage Network Rail to ensure future managing change cases are progressed in a more timely manner.

Impact of the change

We note that this change impacts the National, Regional Comparison, Region and System Operator 2021-22 scorecards with overall passenger satisfaction now being measured by Wavelength. We recognise the benefits of more frequent (periodic) reporting compared to the NRPS (twice-yearly pre-pandemic years).

We acknowledge in your letter that no suitable alternatives are currently available for the passenger satisfaction at managed stations measure. We recognise that work is ongoing in relation to this measure, and we would like to continue our engagement with you on this. We also welcome your offer to discuss the support you have been providing to Transport Focus and supporting data that is being used for internal monitoring. We will be in touch to arrange an update meeting for November to agree the reporting of this measure in the 2021-22 scorecards, in the continued absence of NRPS data.

Stakeholder engagement

As set out in our Managing Change Policy, we expect Network Rail to engage with its stakeholders about changes relative to its settlement. This approach should be consistent with the [principles of good stakeholder engagement](#).

We welcome Network Rail's engagement with its business units and relevant industry stakeholders such as DfT, Rail Boards and RDG and acknowledge the support for this change to using Wavelength. Should any stakeholders raise any concerns about the reporting of overall passenger satisfaction or passenger satisfaction with managed stations measures, please inform ORR as soon as possible.

ORR opinion and holding to account

ORR's opinion is that it is appropriate for us to agree to this Level III Relevant Change to replace the data source used for the overall passenger satisfaction measure with Wavelength. We support this change and recognise that work is ongoing to provide alternatives for the measurement of passenger satisfaction with managed stations. We look forward to continuing our engagement on suitable options for this measure.

We acknowledge that Wavelength results will be available in scorecards each period for the overall passenger satisfaction measure. Scorecards will be published on Network Rail's website at the end of each financial year as part of the Annual Return and Accounts.



Lastly, we expect Network Rail to keep us updated on any potential future impact and/or changes to the passenger satisfaction measures as early as possible.

Yours sincerely

Richard Coates

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