

Feras Alshaker
Director, Planning and Performance



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Dear Paul

23 March 2022

ORR opinion (under our Managing Change Policy) on changes to measures reported through Network Rail's regional comparison scorecard for 2022-23

Thank you for your letter dated 28 February 2022 outlining Network Rail's proposed changes to four measures to be reported through your regional comparison scorecard for 2022-23 (effective from 1 April 2022).

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.

1. Changes to methodology for On Time

We note the work which has been undertaken by Network Rail during 2021-22 to improve the accuracy in reporting On Time measures (e.g. On Time, Time to 3 and Time to 15) and to align with the adoption of wider system changes for industry reporting of these measures from 1 April 2022. We understand that this change will be reflected in the regional comparison scorecard from 2022-23 Period 1. We welcome Network Rail's decision to refresh datasets back to 2014-15 Period 1. We

have reviewed the data provided to us on 9 March 2022 using the new methodology and note that changes to On Time data are generally very small. We also note that you are still engaging with DfT on the approach taken to set targets. Please continue to keep my team informed of progress on this.

2. Changes to the elements within the Complaints Handling Index

We note Network Rail's proposals to make the following amendments to the Complaints Handling Index:

Element	Previous or New	Status for 2022-23
Average age	Previous	Retain
Complaints received	Previous	Retain
Turnaround time	Previous	Remove
Average customer survey score	New	New
Average score of internal quality assurance assessments	New	New

We welcome the introduction to the index of quality elements, including feedback directly from your customers.

A key change is the removal of Turnaround time (the age of cases when they are closed), with only Average age being retained (the age of cases that are still open). We note that there will be no element reported within the scorecard that captures how long it takes for cases to be closed. However, the regulatory target for Network Rail to close 95% of complaints within 20 working days in relation to managed stations will continue to apply (pending any wider changes that are introduced via our Complaints Code of Practice consultation), although this is not part of the scorecard measure. We will continue to monitor Network Rail's progress on handling managed station complaints through our normal activities.

3. Replacing the data source that comprises the passenger satisfaction measure at managed stations

We welcome Network Rail's proposal to use Viewpoint feedback terminals at Network Rail managed stations as an interim data source for measuring passenger satisfaction at these stations. This will avoid the possibility of reporting no data for this measure in 2022-23, as was the case in 2021-22 due to the National Rail Passenger Survey (NRPS) being suspended; this is analogous to the approach we have agreed with National Highways while the target for the Strategic Road User Survey (SRUS) is suspended. We note there is work being done within the industry to create a single industry survey to capture passenger feedback in future. Please keep my team informed of progress on this and of any implications it may have on

how best to measure passenger satisfaction in future. This applies both to the measure of passenger satisfaction at managed stations and overall passenger satisfaction which changed its data source to Wavelength from NRPS last year (2021-22).

4. Updating the enhancements milestones measure

We note that this proposal reflects feedback and significant engagement you have had with DfT to incorporate Project SPEED benefits within the Enhancements Milestones measure. We consider that the two metrics proposed for tracking delivery of enhancements acceleration through SPEED on the 2022-23 regional comparison scorecard are suitable, i.e. 1) Cost saved through application of SPEED approach (% efficiency) and 2) Time saved through application of SPEED approach (% of original timetable).

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 and Transport Scotland on changes to measures. Should any stakeholders raise any future concerns about reporting these four measures, please inform ORR as soon as possible.

Changes to target ranges in scorecards

Although out of scope of the Managing Change Policy, we also welcome the changes you are making to how target ranges work in your scorecards. We agree that targets equating to 100% achievement is more intuitive for users of the scorecards.

Timings of change

The proposed changes are set to be incorporated into the regional comparison scorecard for 2022-23 (Year 4 of CP6), which will take effect from 1 April 2022.

Conclusion

We support this Level III Relevant Change to four measures reported through Network Rail's regional comparison scorecard for 2022-23. This letter, along with your letter to us, will be published on our website shortly.

Yours sincerelyA handwritten signature in black ink, appearing to be 'Feras Alshaker', written over a light blue circular stamp.**Feras Alshaker**

Director, Planning and Performance