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Dear Sir or Madam

ORR's approach to transparency – consultation response

Thank you for providing Passenger Focus with the opportunity to offer comment on the above consultation. Like ORR, Passenger Focus shares the view that increasing the amount of data and information available to passengers enables choice and facilitates decisions and travel options. It also empowers passengers, ensures the accountability of service providers and helps drive up standards.

Passenger appetite for improved availability and disaggregation of information has been an increasingly significant theme across many areas of our work. It is entirely understandable that passengers want information to be broken down to show and reflect their actual experiences. Overall averages for performance can mask highs and lows across services, times of day and different points along the route. For information to be useful and provide potential to drive change, as a minimum, data needs to be available at route-level and with localised details. Ultimately there should be no reason why a passenger should not be able to check on the performance of their specific train, using a database of performance statistics. Similarly, information about investment in stations or staff availability will be most meaningful in relation to specific locations.

Passenger Focus therefore supports the efforts that ORR has already taken to get the industry to publish information at a more disaggregated level and is happy that the transparency agenda appears to be gaining pace.

As you will know from the joint piece of research that we conducted with ORR[1], passengers believe there is a role for increased information. They see the benefit chiefly coming by virtue of its existence and availability, believing that this would increase the transparency of the rail industry and lead to improvements through the industry being under greater scrutiny. The role of scrutiny and challenge was generally seen as one for appropriate representative bodies empowered, and with the experience, to take the passenger agenda forward to make operators more publically accountable. A range of measures were felt to capture passenger experience, these included: punctuality and reliability, investment, comfort, fares, staff, station facilities and journey time. Passengers felt that this should be updated at least every three to six months and provided by a 'trusted source'. Passengers can often be distrustful of figures released directly by operators themselves, so it is important that an independent body such as the ORR, continues to perform the role of scrutineer, to set the standard and ensure that data on a particular aspect of the service complies to a common standard.

If data is to be useful to the public it needs to be both consistent and accurate, so whilst we are supportive of the role third parties play in disseminating it, the organisations responsible for providing it to them must exercise some quality control measures. It is also important that the context in which that information is provided is clear. For example, if two third party app developers make use of real time timetable information but actually use slightly different sources of data there is a danger that the information could conflict (creating doubt) or that one of the developers does not provide the full picture. The consultation document describes how ORR is considering the possibility of publishing duty holder specific KPIs on safety, in order to help provide useful insight and examples of best practice. This is certainly something that could have merit, but once in the public domain data on safety will need to be provided with the appropriate background information so that any negative results could not be unduly misinterpreted.

Simplicity, in the presentation of information, is also key. As part of our Franchise research, in which we conducted a number of route based surveys, we asked passengers what types of information (if made available) they would want to use. The most common answers related to the ability to be able to compare fares for similar journeys undertaken by passengers on other routes. Whilst this type of information is already available, the results of the research could suggest that passengers don't feel that it's in a format that easily allows them to make the comparisons they wish to make. Although we are conscious that this consultation is more about the overarching principles, we would be happy to share this data with you if desired.

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[1] Putting rail information in the public domain, Passenger Focus and ORR, May 2011
http://www.passengerfocus.org.uk/media/bad419c601347efc5b7965015b2dcd7a937d4e00/passenger_information_in_the_public_domain__final.pdf

The research we are currently undertaking with ORR and National Rail Enquiries will shed further light on how performance and potentially other data might best be provided to passengers.

A wide range of data is already collected by the rail industry in the course of operation. Much of this could easily be made accessible, whether in raw format (for personal interrogation or translation via application developers) or more formally published. As an example data is currently collected on ticket queuing times and the Passenger Assist reservation service.

Whilst a very useful tool, the NRT Portal could provide a more comprehensive research tool by disaggregating data even further, e.g. by line of route. In the long term, there could be benefit to passengers if complaints data was made more granular. At present there are a limited number of categories, some of which cover a huge range of issues such as service performance. If a passenger could see that they were not the only one to complain about a particular train service being consistently late or an element of the service at their local station, there would be a greater opportunity to apply pressure for change at a more local level.

Encouragingly the rail industry has already acknowledged passengers' legitimate interests in a range of data areas. As you rightly mention in your consultation document, some of the more progressive operators are already taking steps towards publishing a wider spectrum of data and making this available at a disaggregated level. However, there are still gaps that need to be covered; for example, more comprehensive right time data. We understand but do not accept the concerns of the industry in publishing this data and their belief that it will allow unfair comparisons between, say, airlines and long distance rail operators. Passengers making a choice between modes do so primarily on cost and convenience rather than a more detailed investigation into performance. We also know from our research that there is a direct link between passenger satisfaction and punctuality[2]. Passengers' satisfaction begins to drop from the point a train is late (i.e. right-time) rather than from the point a train is declared late (i.e. 5 or 10 minute threshold). The better the focus on a right-time railway the bigger the passenger satisfaction 'dividend'. Transparency of data will help maintain this operational focus. We also think there are gaps in data provision when it comes to crowding data. ORRs research with SWT shows that that telling people that certain trains are less busy can lead to a shift in travel patterns.

Passenger Focus is keen to see the industry implement a ticket and retailing strategy that will increase transparency and trust in the fares structure. Passenger focus has an extensive body of

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[2]http://www.passengerfocus.org.uk/media/53ea8eb364a2ff2b2e2bae3935b06bde3a2b423b/examining_the_links_between_performance_measures_and_customer_satisfaction_nxea.pdf

work on passenger attitudes to fares and ticketing[3]. One of the consistent themes is that passengers do not trust the system to give them the right fare – something confirmed in ORRs own research. The rail industry must think differently about ticket retailing: the onus should be on train companies and retailers to sell the right ticket and less on the passenger to buy the right ticket. Passengers need to be guided more effectively to the right thing for them, not have to guess from a baffling array of different tickets. The options to trade up for greater flexibility, onboard quality etc. and the options to pay less for reduced flexibility should be fully-transparent. The industry must make it far harder to overpay and should make it a selling point that if you do, the difference will be refunded.

Our submission to the DfT's fares and ticketing review[4] sets out a number of recommendations – of particular relevance are:

- That validity restrictions should be printed on 'walk up' tickets, whichever purchasing-channel is used.
- That booking offices, TVMs and websites should be able to show passengers the "permitted routes" applicable to any 'walk up' or season ticket.
- That season tickets should be sold with a "permitted routes" map.
- That to guard against passenger perception that no or very few tickets are available at the advertised headline price (e.g. A to B one way from £8), train companies should be transparent about how many tickets they have sold at the lowest Advance price for their key passenger flows.

To achieve the full benefits of the open data agenda and to ensure that relevant information is provided across the board, Passenger Focus advocates that, alongside other measures, franchise contracts and the metrics for Control Period 5/Periodic Review 13 are specifically used to embed open data principles and requirements within the frameworks governing the rail industry.

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[3] Ticket to ride May 2012,
Passenger Perceptions of fares and ticket options May 2011,
Fares and Ticketing Study 2009,
Buying a ticket at the station – research on ticket machine use October 2008
Ticket Vending Machine Usability, July 2010
[4] Passenger Focus response to the Government's rail fares and ticketing review. June 2012
http://www.passengerfocus.org.uk/media/5e9965ac9a71d50b08c4073a2836e71ac1de2b7e/Passenger%20Focus%20response%20to%20the%20rail%20fares%20and%20ticketing%20review%20-%20June%202012.pdf

In conclusion, Passenger Focus welcomes the steps ORR is taking towards increasing the transparency of the rail industry and supports the presumption in favour of release of information.

Yours sincerely

Dan Taylor

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