

Assessment of compliance with the Code of Practice for Official Statistics

Rail Statistics

(produced by the Office of Rail Regulation)

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About the UK Statistics Authority

The UK Statistics Authority is an independent body operating at arm's length from government as a non-ministerial department, directly accountable to Parliament. It was established on 1 April 2008 by the *Statistics and Registration Service Act 2007*.

The Authority's overall objective is to promote and safeguard the production and publication of official statistics that serve the public good. It is also required to promote and safeguard the quality and comprehensiveness of official statistics, and good practice in relation to official statistics.

The Statistics Authority has two main functions:

1. oversight of the Office for National Statistics (ONS) – the executive office of the Authority;
2. independent scrutiny (monitoring and assessment) of all official statistics produced in the UK.

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Assessment of compliance with the Code of Practice for Official Statistics

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ASSESSMENT AND DESIGNATION

The *Statistics and Registration Service Act 2007* gives the UK Statistics Authority a statutory power to assess sets of statistics against the *Code of Practice for Official Statistics*. Assessment will determine whether it is appropriate for the statistics to be designated as National Statistics.

Designation as National Statistics means that the statistics comply with the *Code of Practice*. The *Code* is wide-ranging. Designation can be interpreted to mean that the statistics: meet identified user needs; are produced, managed and disseminated to high standards; and are explained well.

Designation as National Statistics should not be interpreted to mean that the statistics are always correct. For example, whilst the *Code* requires statistics to be produced to a level of accuracy that meets users' needs, it also recognises that errors can occur – in which case it requires them to be corrected and publicised.

Assessment reports will not normally comment further on a set of statistics, for example on their validity as social or economic measures. However, reports may point to such questions if the Authority believes that further research would be desirable.

Assessment reports typically provide an overview of any noteworthy features of the methods used to produce the statistics, and will highlight substantial concerns about quality. Assessment reports also describe aspects of the ways in which the producer addresses the 'sound methods and assured quality' principle of the *Code*, but do not themselves constitute a review of the methods used to produce the statistics. However the *Code* requires producers to "seek to achieve continuous improvement in statistical processes by, for example, undertaking regular reviews".

The Authority may grant designation on condition that the producer body takes steps, within a stated timeframe, to fully meet the *Code's* requirements. This is to avoid public confusion and does not reduce the obligation to comply with the *Code*.

The Authority grants designation on the basis of three main sources of information:

- i. factual evidence and assurances by senior statisticians in the producer body;
- ii. the views of users who we contact, or who contact us, and;
- iii. our own review activity.

Should further information come to light subsequently which changes the Authority's analysis, it may withdraw the Assessment report and revise it as necessary.

It is a statutory requirement on the producer body to ensure that it continues to produce the set of statistics designated as National Statistics in compliance with the *Code of Practice*.

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1 Summary of findings

1.1 Introduction

1.1.1 This is one of a series of reports¹ prepared under the provisions of the *Statistics and Registration Service Act 2007*². The Act requires all statistics currently designated as National Statistics to be assessed against the *Code of Practice for Official Statistics*³. The Act also allows an assessment of other official statistics in order for them to gain National Statistics status. This report is in response to such a request and covers the set of statistics reported in *National Rail Trends quarterly summary*⁴ (NRTQS), produced by the Office of Rail Regulation (ORR), which comprises the separate 'reports'⁵ (collectively referred to in this report as NRT statistics):

- *Passenger Kilometres;*
- *Passenger Journeys;*
- *Passenger Revenue;*
- *Timetabled Train Kilometres;*
- *Public Performance Measure;*
- *Complaints;*
- *National Rail Enquiries;*
- *Peak Crowding and Passenger Demand;*
- *Freight Moved;*
- *Freight Lifted;*
- *Freight Performance Measure;*
- *Safety;*
- *Government Support to the Rail Industry;*
- *Rolling Stock;*
- *Freight Market Indicators;*
- *Rail Fares Index;*
- *Infrastructure on the Railways;*
- *Regional Usage Profiles;*
- *Train Operating Companies;* and
- *Sustainable Development.*

1.1.2 This report was prepared by the Authority's Assessment team, and approved by the Board of the Statistics Authority on the advice of the Head of Assessment.

1.2 Decision concerning designation as National Statistics

1.2.1 The Statistics Authority judges that the statistics covered by this report are readily accessible, produced according to sound methods and managed impartially and objectively in the public interest, subject to any points for action

¹ <http://www.statisticsauthority.gov.uk/assessment/assessment-reports/index.html>

² http://www.opsi.gov.uk/Acts/acts2007/pdf/ukpga_20070018_en.pdf

³ <http://www.statisticsauthority.gov.uk/assessment/code-of-practice/index.html>

⁴ <http://www.rail-reg.gov.uk/upload/pdf/quarterly-nrt-report-q3.pdf>

⁵ <http://dataportal.orr.gov.uk/>

in this report. The Statistics Authority has determined that the statistics published in the products listed in paragraph 1.1.1 can be designated as new National Statistics products, subject to ORR implementing the enhancements listed in section 1.5 and reporting them to the Authority by September 2012.

1.2.2 The ORR has informed the Assessment team that it has started to implement the Requirements listed in section 1.5. The Statistics Authority welcomes this.

1.3 Summary of strengths and weaknesses

1.3.1 ORR undertook a full review of the impact of the *Code* on its statistical organisation in 2009. As a result, ORR has a page⁶ on its website which includes helpful information for users, such as statements on statistical quality and user engagement. ORR needs, however, to publish more detailed information about methods and quality alongside its statistics.

1.3.2 ORR has moved from the publication of an annual compendium to the regular release of separate sets of statistics ('reports') alongside a quarterly summary report (NRTQS). The reason for the change was to improve the timeliness of the published statistics. NRTQS brings together a range of previously published statistics, although the report provides little commentary about the policy and operational context in which the statistics have been collected and will be used.

1.3.3 ORR releases statistics using its National Rail Trends (NRT) Portal. The portal does not link the various statistics together well and does not provide users with easy-to-use entry points.

1.4 Detailed recommendations

1.4.1 The Assessment team identified some areas where it felt that the Office of Rail Regulation could strengthen its compliance with the *Code*. Those which the Assessment team considers essential to enable designation as National Statistics are listed in section 1.5. Other suggestions, which would improve the statistics and the service provided to users, but which are not formally required for their designation, are listed at annex 1.

1.5 Requirements for designation as National Statistics

Requirement 1	Adopt systematic statistical planning arrangements, including transparent priority setting (para 3.4).
Requirement 2	Publish details of how the published timetable takes account of user needs (para 3.5).
Requirement 3	Review the presentation of separate reports across topics to ensure that the information provided is clear and consistent and meets users' needs (para 3.6).

⁶ <http://www.rail-reg.gov.uk/server/show/nav.2255>

Requirement 4	Provide a statement for each separate report explaining the nature and extent of revisions at the same time that they are released (para 3.7).
Requirement 5	Publish detailed methods information which informs users of the administrative sources used and the steps taken by ORR to compile the published statistics, including explanations of why particular choices were made (para 3.10).
Requirement 6	Make plans to assess the burden on data suppliers for the private investment survey and report on progress in reducing this burden (para 3.12).
Requirement 7	Publish information about the quality and reliability of published statistics in relation to the range of potential uses (para 3.15).
Requirement 8	Improve the commentary in the releases so that it aids user interpretation of the statistics (para 3.16).
Requirement 9	Ensure that all its statistics are available in formats that enable users to download information relevant to their needs (para 3.17).
Requirement 10	Make changes to the home page of the NRT Portal to ensure that users are able to easily identify and access the information they require (para 3.18).
Requirement 11	Ensure that <i>NRTQS</i> and all other releases are made available through the National Statistics Publication Hub (para 3.20).
Requirement 12	Update their Statement of Administrative Sources to include all sources used in the production of rail statistics and information about other administrative sources that are not currently being used, but that have the potential to be so used (para 3.21).

2 Subject of the assessment

- 2.1 The Office of Rail Regulation (ORR) is the independent safety and economic regulator for the rail industry in Great Britain; it publishes a range of rail statistics. Following the publication of the White Paper: *The Future of Rail*⁷ in July 2004, responsibility for the compendium statistical publication *National Rail Trends* – which provided an overview of the rail industry in Great Britain – passed from the Strategic Rail Authority⁸ to ORR. In 2009 ORR decided to publish the statistics when they became available rather than waiting to publish them annually in a compendium publication *National Rail Trends*. At the same time, ORR started to publish the statistics using its NRT Portal. ORR continued to produce *National Rail Trends* until 2010-11. Most of the statistics previously published in *National Rail Trends* are now available as freestanding reports on its NRT Portal.
- 2.2 In May 2012 ORR published the first edition of *National Rail Trends Quarterly Summary (NRTQS)*, which brings together a selection of statistics from the separate reports published on its NRT Portal in the previous quarter. In 2012-13, *NRTQS* will be published in August, October, December and April.
- 2.3 The statistics previously published in *National Rail Trends*, and currently published in separate ‘reports’, are drawn from a range of sources, including the LENNON ticketing database and safety and other statistics provided by Network Rail and the Train Operating Companies (TOCs). All of the data used to produce the statistics, with the exception of a survey of financial investment, are from administrative sources. ORR use similar data sources to produce a quarterly publication *Network Rail Monitor*⁹ which contains statistics relating to Network Rail’s delivery of services. ORR told us that the statistics in *Network Rail Monitor* are compiled using different processes to those used to produce the *National Rail Trends* statistics and ORR asked these not to be covered by this assessment.

LENNON ticketing database

- 2.4 LENNON (Latest Earnings Networked Nationally OverNight) is the rail industry’s central ticketing system; it is the basis for passenger kilometres, journeys and revenue data. LENNON is owned and operated by the Association of Train Operating Companies¹⁰ (ATOC) and holds information about the majority of national rail tickets purchased in Great Britain. It is used to allocate the revenue from ticket sales between TOCs. ORR also receives non-LENNON kilometres and journey data from the train operators. Non-LENNON data is information not recorded within the LENNON system, such as operator-specific tickets – it accounts for approximately 1 per cent of total journeys or total kilometres. Since 2010-11, ORR has received non-LENNON data on a

⁷http://webarchive.nationalarchives.gov.uk/20050301192906/http://dft.gov.uk/stellent/groups/dft_railways/documents/page/dft_railways_031105.hcsp

⁸ The Strategic Rail Authority was a non-departmental public body set up under the *Transport Act 2000* to provide strategic direction for the rail industry, and existed between 2001 and 2006

⁹ <http://www.rail-reg.gov.uk/server/show/nav.2284>

¹⁰ <http://www.atoc.org/>

quarterly basis; before this, ORR received non-LENNON data at the end of each financial year. This meant that the statistics would remain provisional until all the non-LENNON data were received. The improved timeliness of the non-LENNON data provided by TOCs means that comparisons with previous quarters can now be made in a timelier manner.

Sources of safety data

2.5 ORR uses three different sources of safety data for publication:

- data from the Safety Management Information System¹¹ operated by the Rail Safety and Standards Board (RSSB) which covers safety on the mainline railways in Great Britain;
- data about safety from the London Underground system; and
- data collected by ORR which covers other safety incidents not reported in statistics from the RSSB or the London Underground.

Other data sources

2.6 ORR publishes data collected using a number of other administrative systems. The data suppliers extract the statistical element of the data from the system and pass it to ORR for publication. These sources include:

- train punctuality data collected by Network Rail. The data are collected by Network Rail for every train planned to run in Great Britain;
- freight moved data collected by Network Rail. The database also works as a billing system between Network Rail and the freight operators; and
- performance data from the National Rail Enquiry Service, also used as management data for ATOC.

2.7 The rail statistics published by ORR are used by:

- Government to inform policy decisions and decisions of where investment in rail and rail subsidies should be focused;
- ORR for management information and to hold Network Rail to account; and
- the Department of Transport to inform publications, such as the compendium publication *Transport Statistics Great Britain*¹².

2.8 The ORR told us that it costs around £40,000 annually to produce rail statistics, which excludes the costs of running the NRT Portal.

¹¹ <http://www.rssb.co.uk/SPR/Pages/SMIS.aspx>

¹² <http://www.dft.gov.uk/statistics/releases/transport-statistics-great-britain-2011/>

3 Assessment findings

Principle 1: Meeting user needs

The production, management and dissemination of official statistics should meet the requirements of informed decision-making by government, public services, business, researchers and the public.

- 3.1 ORR engages with users of rail statistics through the Rail statistics management group (RSMG), and the NRT stakeholder group. The membership of the RSMG includes Network Rail¹³, Passenger Focus and the RSSB as well as representatives from the Department for Transport and the ATOC. The membership of the sub-group includes passenger representatives, individuals representing the train operators, and central government. Both groups meet quarterly. ORR is a member of the Transport Statistics Users Group¹⁴ and attends meetings when relevant topics are discussed. The sub-group discusses issues around the quality of NRT data whereas the RSMG focuses on wider data issues for the whole industry. ORR publishes details, including membership, of both groups¹⁵ in a user engagement section on its website, although information is not published about the issues discussed in these meetings. For completeness, we suggest that ORR publish the minutes and the agendas of the RSMG and sub-group meetings.
- 3.2 ORR has published a statement on user engagement¹⁶ which includes links to the results of a consultation¹⁷ carried out by the former Strategic Rail Authority in 2007. The aim of the consultation was to assess the public value of NRT and to collect users' views on the publication. The results document does not state how many users responded to the consultation, nor does it say what changed as a result. ORR has carried out more recent surveys of users of the NRT Portal and has published the results¹⁸. The final report of a survey of users of the NRT Portal was carried out in September 2011 and included a table of key findings and ORR's response, although the deadlines for many of the actions listed in the table has passed. ORR commissioned independent consultants to carry out a study into the optimal dissemination method for rail statistics. The report, produced in March 2010, recommended the move to the NRT Portal. This final report has not been published as ORR told us they were not happy with the quality of the report. We suggest that ORR provide a summary of the key findings from the report on the move to the NRT Portal. We also suggest ORR ensure that actions resulting from user consultations are kept up to date and communicated to users, such as the key findings table included in the NRT Portal survey report.
- 3.3 ORR asks users for feedback on the statistics on its website. The user engagement page (see footnote 18) also provides details of proposed changes to the methods used to produce the statistics. ORR told us that it receives

¹³ <http://www.networkrail.co.uk/>

¹⁴ <http://www.tsug.org.uk/index.php>

¹⁵ <http://www.rail-reg.gov.uk/server/show/nav.2256>

¹⁶ <http://www.rail-reg.gov.uk/upload/pdf/statistics-statement-user-engagement.pdf>

¹⁷ <http://www.rail-reg.gov.uk/upload/pdf/nrt-survey-results2007.pdf>

¹⁸ http://www.rail-reg.gov.uk/upload/pdf/nrt_portal_survey_summary_sept2011.pdf

relatively few responses to its requests for feedback. Users are able to register on ORR's website for access to additional data and to be included on a mailing list for the NRT newsletter. The registration form requires users to enter their name, email address and organisation. ORR told us that it uses the registration information to maintain a list of users to receive NRT newsletters, and to monitor the types of analysis being carried out on the data in order to encourage wider access to its statistics. While we appreciate that this may be a good way of collecting contact information about users, we suggest that ORR explore other means of collecting information about users and uses of its statistics, as an alternative to the website registration process.

- 3.4 ORR has published a business plan¹⁹ for 2010-11. Theme 7 of the plan refers to high quality data and information for key decisions, although there is no mention of data or statistics in the section on priorities for ORR. ORR told us that during each business planning round, information is collated on work streams and the resources required to produce the NRT statistics. Despite this, ORR has published neither a statistical workplan nor any information about its statistical decision-making process. As part of the designation as National Statistics, ORR should adopt systematic statistical planning arrangements, including transparent priority setting²⁰ (Requirement 1). In meeting this requirement, we suggest that ORR publish and consult on an annual statistical workplan.
- 3.5 ORR publishes a timetable²¹ of publication dates for its statistics. ORR did not provide the Assessment team with information about how user needs are taken into account in planning the timetable of releases. As part of the designation as National Statistics, ORR should publish details of how the published timetable takes account of user needs²² (Requirement 2).

¹⁹ <http://www.rail-reg.gov.uk/upload/pdf/business-plan-2011.pdf>

²⁰ In relation to Principle 1, Practice 3 of the *Code of Practice*

²¹ <http://www.rail-reg.gov.uk/server/show/nav.1862>

²² In relation to Principle 1, Practice 4 of the *Code of Practice*

Principle 2: Impartiality and objectivity

Official statistics, and information about statistical processes, should be managed impartially and objectively.

- 3.6 ORR publishes rail statistics using an online system called the NRT Portal. The NRT Portal contains a number of 'reports' (tables or charts) on specific topics; for each topic there can be a number of separate 'reports'. For example the topic *Passenger Kilometres* has four reports: passenger kilometres by sector – chart; passenger kilometres by sector – table; passenger kilometres – chart; and passenger kilometres by ticket type – table. The arrangement of statistics into separate reports is piecemeal and the information included in each report is not consistent across topics. Each report includes a 'source and notes' section and some reports also include more detailed information about the methods used to produce the statistics, and bullet points of key results. It is not clear which report users should look at in order to access this information. For *Passenger Kilometres*, for example, only two of the reports (passenger kilometres by sector – table, and passenger kilometres by ticket type – table) contain this more detailed information about methods. In addition, the separation of the statistics into separate reports does not enable easy comparison across them. *NRTQS* is intended as a summary of the statistics published in the previous quarter although ORR told us that it would only replicate the most interesting statistics over the quarter. As part of the designation as National Statistics, ORR should review the presentation of separate reports across topics to ensure that the information provided is clear and consistent and meets users' needs²³ (Requirement 3).
- 3.7 ORR has published a revisions policy²⁴ and maintains a revisions log²⁵ which is publicly available. The revisions policy mentions that quarterly statistics from the LENNON ticketing database are marked as provisional as they may be revised, but no further details are given about the nature of the revisions. *Passenger Kilometres*, which is based on LENNON data, for example, has a footnote which states that data for quarters one to three 2011-12 are provisional, but no information is given about when final data will be available or the likely size of the revision. A link is given to the revisions log, but this contains a large amount of information in spreadsheets and does not always explain fully the implications of the revisions for the relevant statistics. As part of the designation as National Statistics, ORR should provide a statement for each separate report explaining the nature and extent of revisions at the same time that they are released²⁶ (Requirement 4).

²³ In relation to Principle 2, Practice 1 of the *Code of Practice*

²⁴ <http://www.rail-reg.gov.uk/upload/pdf/statistics-statement-revisions-policy.pdf>

²⁵ <http://www.rail-reg.gov.uk/upload/xls/stats-revisions-log.xls>

²⁶ In relation to Principle 2, Practice 6 of the *Code of Practice*

Principle 3: Integrity

At all stages in the production, management and dissemination of official statistics, the public interest should prevail over organisational, political or personal interests.

- 3.8 No incidents of political pressures, abuses of trust or complaints relating to professional integrity, quality or standards were reported to or identified by the Assessment team.

Principle 4: Sound methods and assured quality

Statistical methods should be consistent with scientific principles and internationally recognised best practices, and be fully documented. Quality should be monitored and assured taking account of internationally agreed practices.

- 3.9 In 2005 ORR commissioned AEA Technology Rail²⁷ to carry out a review to assess whether the data used to produce the NRT statistics were fit for purpose. A range of users of NRT statistics were consulted as part of the work and ORR published the final report²⁸ on its website in 2006. The report recommended improving the text accompanying the statistics in *NRT* along with more specific improvements to the quality and presentation of the statistics. Although this report is freely available, ORR has not published a response which states which of the recommendations have been addressed. We suggest that ORR review the recommendations included in the review of NRT statistics and provide an update on progress.
- 3.10 The information about methods provided with each report on the NRT Portal does not provide users with sufficient details of how the statistics are produced. For example, the introduction to the discontinued *National Rail Trends* states that LENNON records the majority of ticket information and that some non-LENNON data are recorded separately by the TOCs, such as operator-specific tickets and website tickets. It also states that in order to produce the rail usage statistics, ORR carries out a reconciliation process to add non-LENNON tickets to the existing LENNON data, although no information about this is given in the statistical reports. *Passenger Revenue by Sector* includes a short methods section which does not clearly mention the reconciliation process, although it does mention the use of a mathematical model. Similarly *Public Performance Measure* lists Network Rail as the source of the data used to produce the statistics, although the methods section does not clearly state how the information is collated to produce statistics on the percentage of trains arriving on time. As part of the designation as National Statistics, ORR should publish detailed methods information which informs users of the administrative sources used and the steps taken by ORR to compile the published statistics, including explanations of why particular choices were made²⁹ (Requirement 5).

²⁷ <http://www.aeat.co.uk/cms/>

²⁸ <http://www.rail-reg.gov.uk/upload/pdf/nrtrev.pdf>

²⁹ In relation to Principle 4, Practice 1 of the *Code of Practice*

Principle 5: Confidentiality

Private information about individual persons (including bodies corporate) compiled in the production of official statistics is confidential, and should be used for statistical purposes only.

3.11 ORR has assured us that it takes all necessary steps to protect the confidentiality of the data it collects. ORR told us that the level of data published is agreed with the data suppliers.

Principle 6: Proportionate burden

The cost burden on data suppliers should not be excessive and should be assessed relative to the benefits arising from the use of the statistics.

- 3.12 ORR commissioned the Office for National Statistics to carry out a quarterly survey of around 40 companies in order to collect information about private investment in the rail industry; this information is published under the *Financial* topic heading on the NRT Portal. ORR told us that the cost of the survey is around £3,500 per year, but has not carried out any assessment of the costs to respondents. ORR told us that details of further work to assess the costs of producing all its statistics are included in its quality improvement plan – although this is not published nor is a date given for when this work will be completed. As part of the designation as National Statistics, ORR should make plans to assess the burden on data suppliers for the private investment survey and report on progress in reducing this burden³⁰ (Requirement 6).
- 3.13 ORR told us that if the publication of a new dataset has been proposed, it meets with the data suppliers to discuss the detail of the available data and the cost implications. Discussions are also held at RSMG meetings about the potential of existing data to meet new requirements. Very little explanation is currently given in the published reports about the data that the statistics are based on, or on the process of deciding which data sources to use. We suggest that ORR improve the information about the (mainly administrative) sources that are used to produce its official statistics.

³⁰ In relation to Principle 6, Practice 1 of the *Code of Practice*

Principle 7: Resources

The resources made available for statistical activities should be sufficient to meet the requirements of this Code and should be used efficiently and effectively.

3.14 ORR told us that it is resourced to produce these statistics to the standards required by the *Code of Practice*.

Principle 8: Frankness and accessibility

Official statistics, accompanied by full and frank commentary, should be readily accessible to all users.

- 3.15 All of the reports covered by this assessment include a note which states that ORR will be producing a full quality report for each of the NRT statistics in line with the Government Statistical Service standards for quality reporting. Details of when this report will be available are not given. *NRTQS* includes a section on quality, but makes no mention of methods, procedures and classifications used to compile the statistics, nor does it comment on the quality and reliability of the statistics in relation to the range of potential uses. ORR told us that the main area where improvements to methods are required is for complaints data; ORR told us that it is working with the TOCs to implement changes, which include ensuring that guidelines are kept up-to-date and are followed by the TOCs. The complaints reports available on the NRT Portal do not mention quality issues with the data or the impact of the planned improvements. As part of the designation as National Statistics, ORR should publish information about the quality and reliability of published statistics in relation to the range of potential uses³¹ (Requirement 7). We suggest that ORR inform users when the full quality report for the NRT statistics will be available and publish details of what the report will contain.
- 3.16 ORR publishes each report with a small paragraph of commentary, limited to a description of the latest data. *NRTQS* includes some commentary, but it does not provide information about the operational or policy context for the statistics. As part of the designation as National Statistics, ORR should improve the commentary in the releases so that it aids user interpretation of the statistics³² (Requirement 8). We suggest that in meeting this requirement ORR should consider the points detailed in annex 2. We also suggest that ORR consider whether *NRTQS* could be used to make comparisons across reports, for example, comparing passenger kilometres with passenger journeys.
- 3.17 ORR releases all of its statistics using the NRT Portal. The format of reports is fixed to the pre-created reports although the data are available to download in Excel spreadsheets. ORR told us that users who responded to the NRT Portal user engagement survey reported a preference for being able to access the data in other formats. As a result ORR is investigating whether it would be possible to make the data available in other formats, for example PDF and CSV. The majority of users who responded to the consultation carried out as part of the assessment noted that the accessibility of data was a concern, specifically the difficulties encountered downloading data. As part of the designation as National Statistics, ORR should ensure that all its statistics are available in formats that enable users to download information relevant to their needs³³ (Requirement 9).
- 3.18 The discontinued *National Rail Trends* contained a contents page, which helpfully separated the range of published statistics into broad topic areas, such

³¹ In relation to Principle 8, Practice 1 of the *Code of Practice*

³² In relation to Principle 8, Practice 2 of the *Code of Practice*

³³ In relation to Principle 8, Practices 3 and 6 of the *Code of Practice*

as 'rail usage', 'rail performance' and 'safety'. The data portal attempts to provide a similar categorisation using six shorter topic headings, such as 'financial', 'network capability and assets' and 'rail performance'. These new headings do not indicate the available statistics clearly as the headings do not provide any more information as to what statistics they cover. Once a user has clicked on one of the categories, a list of the reports appears although no description is given other than the title of the table or chart. As part of the designation as National Statistics, ORR should make changes to the home page of the NRT Portal to ensure that users are able to easily identify and access the information they require³⁴ (Requirement 10). This could provide the user with a short description of the statistics to save them having to navigate to the next page to check the contents.

³⁴ In relation to Principle 8, Practice 5 of the *Code of Practice*

Protocol 1: User engagement

Effective user engagement is fundamental both to trust in statistics and securing maximum public value. This Protocol draws together the relevant practices set out elsewhere in the Code and expands on the requirements in relation to consultation.

3.19 The requirements for this Protocol are covered elsewhere in this report.

Protocol 2: Release practices

Statistical reports should be released into the public domain in an orderly manner that promotes public confidence and gives equal access to all, subject to relevant legislation.

- 3.20 Neither *NRTQS* nor the reports are currently available through the National Statistics Publication Hub as they are official statistics. As part of the designation as National Statistics, ORR should ensure that *NRTQS* and all other reports are made available through the Publication Hub³⁵ (Requirement 11).

³⁵ In relation to Protocol 2, Practice 3 of the *Code of Practice*

Protocol 3: The use of administrative sources for statistical purposes

Administrative sources should be fully exploited for statistical purposes, subject to adherence to appropriate safeguards.

3.21 ORR has published a Statement of Administrative Sources³⁶ which includes the LENNON ticket database and the sources of rail safety data. The source information provided as part of the published reports suggests that other administrative sources are used to produce the statistics; for example, the TOCs are listed as the source of complaints statistics. As part of the designation as National Statistics, ORR should update its Statement of Administrative Sources to include all sources used in the production of rail statistics, and information about other administrative sources that are not currently being used, but that have the potential to be so used³⁷ (Requirement 12).

³⁶ <http://www.rail-reg.gov.uk/upload/pdf/statistics-statement-admin-sources.pdf>

³⁷ In relation to Protocol 3, Practice 5 of the *Code of Practice*

Annex 1: Suggestions for improvement

A1.1 This annex includes some suggestions for improvement to ORR's Rail Statistics, in the interest of the public good. These are not formally required for designation, but the Assessment team considers that their implementation will improve public confidence in the production, management and dissemination of official statistics.

- | | |
|----------------------|--|
| Suggestion 1 | Publish the minutes and the agendas of the RSMG and sub-group meetings (para 3.1). |
| Suggestion 2 | Provide a summary of the key findings from the report on the move to the NRT Portal for users (para 3.2). |
| Suggestion 3 | Ensure that actions resulting from user consultations are kept up to date and communicated to users, such as the key findings table included in the NRT Portal survey report (para 3.2). |
| Suggestion 4 | Explore other means of collecting information about users and uses of the statistics, as an alternative to the website registration process (para 3.3). |
| Suggestion 5 | In meeting Requirement 1, publish and consult on an annual statistical workplan (para 3.4). |
| Suggestion 6 | Review the recommendations included in the review of <i>NRT</i> and publish an update on progress (para 3.9). |
| Suggestion 7 | Improve the information about the (mainly administrative) sources that are used to produce its official statistics (para 3.13). |
| Suggestion 8 | Inform users when the full quality report for the NRT statistics will be available and details of what the report will contain (para 3.15). |
| Suggestion 9 | Consider the points detailed in annex 2, in seeking to improve the statistical releases (para 3.16). |
| Suggestion 10 | Consider whether <i>NRTQS</i> could be used to make comparisons across reports, for example, comparing passenger kilometres with passenger journeys (para 3.16). |

Annex 2: Compliance with Standards for Statistical Releases

- A2.1 In October 2010, the Statistics Authority issued a statement on *Standards for Statistical Releases*³⁸. While this is not part of the *Code of Practice for Official Statistics*, the Authority regards it as advice that will promote both understanding and compliance with the *Code*. In relation to the statistical releases associated with *Rail Statistics*, this annex comments on compliance with the statement on standards.
- A2.2 In implementing any Requirements of this report (at paragraph 1.5) which relate to the content of statistical releases, we encourage the producer body to apply the standards as fully as possible.

Appropriate identification of the statistics being released

- A2.3 The titles used to identify reports from the NRT Portal home page do not describe the coverage of the report, nor do they give the period to which the latest statistics relate. Abbreviations are sometimes included in the title, for example, *Public Performance Measure by TOC*. *NRTQS* does, however, give more information about the period covered by the statistics.
- A2.4 Each separate report includes the publication date for the current statistics and the next publication date. The frequency with which the statistics are published is not clear.
- A2.5 The reports do not have an introduction before the table or chart and there is no account of what is included in the report in terms of tables and subjects discussed. It is not clearly stated which of the statistics in the report are new and which have previously been published, particularly when a time series is shown.

Include commentary that is helpful to the non-expert and presents the main messages in plain English

- A2.6 Each report includes a short paragraph on key results which identifies the main messages. The language frequently includes abbreviations and technical terms which are not explained, for example 'all non-franchised operators increased their PPM in Q3 2011-12 when compared to Q3 last year'.
- A2.7 The commentary only describes rises and falls and does not provide additional information that adds insight. For example, *Complaints by Category and TOC – Table* is accompanied by a single sentence of commentary 'In 2011-12 Q3, all TOCs with the exception of Southern receive the majority of their complaints on train service performance'.

Use language that is impartial, objective and professionally sound

³⁸ <http://www.statisticsauthority.gov.uk/news/standards-for-statistical-releases.html>

A2.8 The text is impartial and descriptive statements are consistent with the statistics. Little information is given about the accuracy of the statistics.

Include information about the context and likely uses

A2.9 No information is given in the separate reports about why the statistics are important, to whom and for what they are likely to be used. *NRTQS* includes a short section on the use and users of the statistics.

A2.10 *NRTQS* includes a section which discusses the processes used in the production of the statistics although no information is given for users about the quality and reliability of the statistics in relation to the range of potential uses. The separate reports include a statement about the future publication of a full quality report for each of the NRT statistics.

Include, or link to, appropriate metadata

A2.11 Each report includes information about the source of the data and additional notes on methods underneath each chart. In addition, each report includes a separate 'source and notes' tab although this directs users back to the information provided at the bottom of each report.

A2.12 The page on ORR's website with documents relating to the *Code of Practice* is entitled 'Code of compliance'. For clarity this should be altered to refer either to the *Code of Practice* or compliance with the *Code*.

Annex 3: Summary of assessment process and users' views

A3.1 This assessment was conducted from September 2011 to May 2012.

A3.2 The Assessment team – Catherine Barham and Neil Wilson – agreed the scope of and timetable for this assessment with representatives of ORR in September. The Written Evidence for Assessment was provided on 1 November. The Assessment team subsequently met ORR during November to review compliance with the *Code of Practice*, taking account of the written evidence provided and other relevant sources of evidence.

Summary of users contacted, and issues raised

A3.3 Part of the assessment process involves our consideration of the views of users. We approach some known and potential users of the set of statistics, and we invite comments via an open note on the Authority's website. This process is not a statistical survey, but it enables us to gain some insights about the extent to which the statistics meet users' needs and the extent to which users feel that the producers of those statistics engage with them. We are aware that responses from users may not be representative of wider views, and we take account of this in the way that we prepare Assessment reports.

A3.4 The Assessment team received 12 responses from the user consultation. The respondents were grouped as follows:

Passenger groups	2
Rail companies	2
Other	4
Data suppliers	4

A3.5 Users were positive about the comprehensiveness of the published statistics; the existence of a single source drawing together statistics from a range of sources was seen as valuable. But accessibility was an area of concern, particularly in relation to the NRT Portal – users noted difficulties in downloading data, and the limited time series available. Some users felt that the portal had lost some of the value that the old 'yearbook' (*National Rail Trends*) format added.

Key documents/links provided

Written Evidence for Assessment document

