

Assessment of compliance with the Code of Practice for Statistics

Statistics from the National Rail Passenger Survey

produced by Transport Focus

Office for Statistics Regulation

We provide independent regulation of all official statistics produced in the UK. Statistics are an essential public asset. We aim to enhance public confidence in the trustworthiness, quality and value of statistics produced by government.

We do this by setting the standards they must meet in the *Code of Practice for Statistics*. We ensure that producers of government statistics uphold these standards by conducting assessments against the *Code*. Those which meet the standards are given National Statistics status, indicating that they meet the highest standards of trustworthiness, quality and value. We also report publicly on system-wide issues and on the way statistics are being used, celebrating when the standards are upheld and challenging publicly when they are not.

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Executive Summary

Judgement on National Statistics Status

- ES.1 This assessment focuses on statistics from the [National Rail Passenger Survey](#) (NRPS) which are produced by [Transport Focus](#). Statistics from the NRPS are not currently produced to the standards required of National Statistics and several areas of non-compliance with the Code of Practice for Statistics need to be addressed.
- ES.2 The UK Statistics Authority considers that in their current form statistics from the NRPS have the potential to be misrepresented or used misleadingly. Transport Focus has agreed to publish an action plan setting out its proposals for addressing the assessment's Requirements by January 2020.

Key Findings

Public Value

- ES.3 Statistics from the NRPS have been produced since 1999 and provide a broadly consistent measure of rail passenger satisfaction in Great Britain. The statistics enable the performance of individual Train Operating Companies (TOCs) to be compared over time, and are of considerable public value to the rail industry and passenger interest groups in particular. They have been used as a key performance indicator in most rail franchise agreements over the last decade.
- ES.4 Transport Focus is taking steps to develop the NRPS to ensure that its statistics remain fit for purpose. However, the survey has two significant limitations:
- i. The first is that the NRPS does not reflect the continuous customer experience of rail travel in GB throughout the year, as NRPS results are only produced for spring and autumn. The survey therefore does not measure satisfaction during periods of disruption on the rail network that fall outside of the spring and autumn fieldwork periods¹, such as those experienced by passengers following the timetable changes in May 2018 and December 2019, short-term effects following the annual fare increases each January, and extreme weather events that often affect the railway in summer and winter.
 - ii. Secondly, the NRPS measures rail passengers' satisfaction based on the last rail 'journey', and not passengers' overall satisfaction with a rail operator. While there are methodological and quality benefits of the rail journey approach, the primary use of the statistics is to measure rail operators' 'overall' performance. This difference increases opportunities for the NRPS statistics to be misrepresented or misused and there is currently little in place to mitigate against this.
- ES.5 Transport Focus engages well with rail industry users and train operating companies (TOCs). However, it has few engagement channels for non-rail industry users of NRPS statistics and needs to look for opportunities to enhance its engagement with this broader group of NRPS statistics users to inform the further development of statistics. Transport Focus does not currently provide equal access to the full range of NRPS outputs for all users. Its published information about the quality of the survey estimates and its advice about the overall strengths and limitations to enable appropriate use of the statistics is also limited and the published technical guide needs updating.

¹ NRPS autumn fieldwork covers a 10-week period between September and mid November each year. Spring fieldwork is over a 10-week period from late January, or occasionally mid January, to ensure that it is complete before Easter.

ES.6 Substantial investment is therefore required to allow for more continuous measurement of passenger satisfaction through additional survey waves, more robust statistics for stations and routes at a lower-levels, and the development of broader measures of overall satisfaction for operators' overall levels of service. These limitations coupled with the potential for future changes to rail industry following the [Williams Rail Review](#), increase the need for further development of the NRPS so that its statistics are relevant and valued.

Quality

ES.7 The NRPS' methodology has remained broadly consistent for the majority of its existence and its long time series is highly valued by rail industry users. The NRPS sampling frame is derived from several rail industry administrative sources and updated every two years (or more often for some TOCs if necessary). However, some rail industry users are concerned that NRPS sample has not kept pace with changes in passenger numbers over time and these concerns are not addressed by the available guidance. Users also highlight insufficient sample sizes for more robust lower-level analyses of passengers' satisfaction with smaller stations and routes.

ES.8 Transport Focus has a limited understanding of the quality of the administrative data sources used to create the NRPS sample and its links with the data suppliers to better understand the relative strengths and limitations of these sources should be strengthened.

Trustworthiness

ES.9 NRPS statistics are presented objectively and impartially and there is no evidence of any issue with the independence of the statistics. Statistics from the NRPS are the only official statistics produced by Transport Focus. The organisation could benefit from strengthening its professional links with the wider Government Statistical Service (GSS) and drawing on its expertise, development opportunities and resources.

ES.10 To enhance trustworthiness in the NRPS statistics, several key areas of non-compliance with the Code of Practice for Statistics need to be addressed. These relate to the orderly release of the statistics and the need to publish the statistics in line with a published release calendar, and to reduce the number of individuals granted access to the NRPS statistics both during the external quality assurance period and when in their final form before publication.

Next Steps

ES.11 The statistics team has agreed to develop and publish an action plan which sets out its proposals for addressing the Requirements described in Tables 1, 2 and 3 of this report. The National Statistics designation cannot be awarded until the Requirements have been sufficiently addressed and Transport Focus has enhanced the public value, quality, and trustworthiness of National Rail Passenger Survey statistics. The Authority will decide whether to award the National Statistics designation, based on OSR's advice. Transport Focus has agreed to publish the action plan by January 2020.

Chapter 1: Public Value

Introduction

- 1.1 Value means that the statistics and other numerical information are accessible, remain relevant and benefit society; helping the public to understand important issues and answer key questions.
- 1.2 Value is a product of the interface between the statistics or other numerical information and those who use them as a basis for forming judgements.

Findings

- 1.3 Demand for rail services has more than doubled over the last 20 years, increasing faster than for any other transport mode. Rail is also the most environmentally friendly form of public transport, providing the cleanest mode for commuters, leisure and business customers. As such, informative statistics that contribute to driving improvements for rail passengers and in turn increase service use really matter. The National Rail Passenger Survey (NRPS) is one of the largest, published, rail passenger satisfaction surveys in the world. It provides a consistent and comparable measure of rail passenger satisfaction across GB so that the performance of individual, franchised Train Operating Companies (TOCs) can be compared over time, and which can be amalgamated to produce GB-level trends. The statistics are well-established having been produced for the last 20 years and are considered a valuable and trusted source by users. As a result of their longevity, since 2008 they have been included as a key performance measure in the franchise agreements of many TOCs. The NRPS is used to assess rail passengers' satisfaction with franchised TOC stations, trains, customer services and the handling of delays. The NRPS is clearly an integral, primary and widely used source of data for these businesses.

Figure 1: Spring 2019 GB 'at-a-glance' passenger journey satisfaction



Source: GB 'At-a-glance' [guide](#) available via Transport Focus website

- 1.4 Outside of the rail industry, the NRPS is a fairly unique data source use by a variety of users including academics, campaigning and passenger groups and trade unions. The NRPS statistics are regarded as important, valuable, and meaningful by these users and inform decisions, direct campaigning initiatives, to supplement business cases and academic research. During the user engagement phase of our assessment, a wide range of uses of the National Rail Passenger Survey statistics were highlighted to us, including:
- as a metric for 'basket of measures' in train operating company franchise agreements
 - as a media opportunity by both TOCs and rail campaign groups in press releases
 - to answer policy questions
 - for ministerial briefings, internal briefings, and fact sheets
 - in public debate as a tool to openly challenge and hold the government and rail industry to account
 - to inform ongoing and future academic research
 - as quality assurance when comparing to other relevant rail statistics
 - to support business cases and investment opportunities
 - used as leverage to gain control over other services
 - to feedback internally on staff performance including recognition for high passenger satisfaction scores
 - to make decisions and direct campaigning
 - to input into government consultations on franchise renewals
 - to support and evidence cases for the retainment of staff at stations

As such, the potential public value of these statistics is far reaching. However, this assessment has identified that there is scope for the value of NRPS to be increased and enhanced for a broader range of users.

Engagement

- 1.5 The Insight team at Transport Focus has strong links with expert users of the NRPS, who are primarily representatives from TOCs, government, and professional rail industry bodies. Users that we spoke to from these groups were satisfied with the level of support that they receive from Transport Focus and spoke positively about the teams' engagement with them. Any data queries are answered promptly and efficiently.
- 1.6 In terms of broader public engagement, Transport Focus publishes a monthly newsletter 'Transport User Voice' as a way of keeping users informed about various developments within the organisation. The [August 2019 edition](#) included a feature around gaining more insight from the NRPS in the future. Transport Focus also hosts an online transport user panel which represents users across the country. The panel is contacted by Transport Focus and complete surveys on specific topics, the findings from which inform ad hoc research projects across the organisation.
- 1.7 Overall, our assessment found that Transport Focus has strong engagement with its established NRPS users, and particularly the TOCs. To improve engagement further, these users told us they would like to see the reinstatement of a previously held annual stakeholder meeting and for Transport Focus to have a more proactive role with other groups, such as the Rail Statistics Management Group chaired by the Office of Rail and Road (ORR). We are encouraged to hear that Transport Focus already plans to reinstate its annual stakeholder meeting and would like to see this continue in order to maintain an open dialogue with these key NRPS users.
- 1.8 The NRPS statistics also have a wider public value for a range of other users, such as passenger campaign groups, academics, and trade unions, all of whom use the statistics to inform their own research, campaigns, and priorities. These users currently have little direct engagement with Transport Focus about the NRPS statistics and extending

engagement to these users would help to Transport Focus to better understand these users' needs from the NRPS statistics. **To enhance the public value of the NRPS statistics and further develop its understanding of NRPS users' needs, Transport Focus should engage with a broader range of current and potential users outside of the rail industry, including established statistical groups and organisations.** In meeting this requirement, Transport Focus may find it useful to seek advice and guidance from the [GSS Good Practice Team](#).

Figure 2: Extracts from website showing current online user engagement methods

The screenshot shows two sections of the Transport Focus website. The left section is titled 'Monthly newsletter' and 'Transport User Voice'. It features a background image of cars on a road. Below the title, it states: 'Transport User Voice is our monthly newsletter highlighting some of our work on behalf of:' followed by a bulleted list:

- rail passengers in Britain
- users of the Strategic Road Network in England
- England's bus, coach and tram passengers outside London.

 It includes a link to 'Read the September 2019 issue' and a 'Sign up' button to receive the newsletter.

The right section is titled 'Transport User Panel' and is dated '22nd August 2019'. It features a background image of a modern building entrance. The text explains: 'As the independent watchdog, Transport Focus works to help those who make decisions about transport understand how things might be improved for transport users, and what transport users really think.' It also states: 'To find this out Transport Focus regularly carries out research among those using different forms of transport or making particular journeys. It also has a panel of transport users across the country who are often asked to give their views about specific issues.' Below this, it describes how panel surveys are used to support findings and provides an example of research on strike action. At the bottom, there is a link to 'Explore the research previously completed with the panel further down the page, or click here to see all recent publications.'

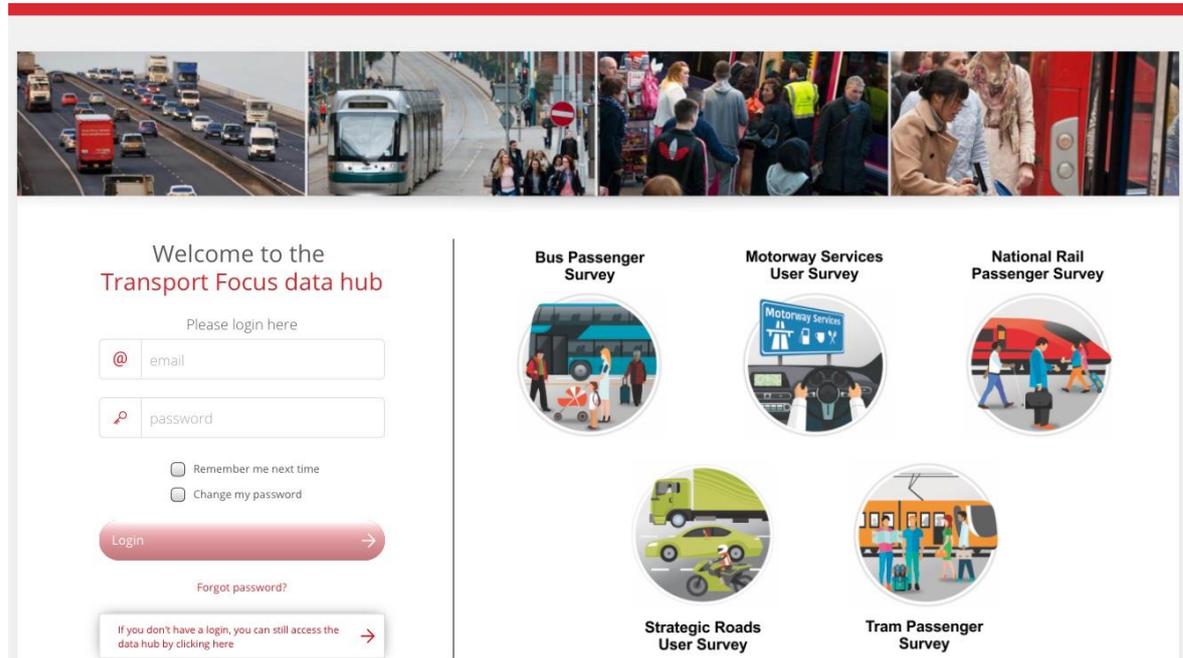
Source: Transport Focus, September 2019

- 1.9 In terms of user engagement about the future development of the NRPS statistics, the results of a formal [stakeholder review](#) were published in 2015, as part of a broader [consultation](#) around the further development of the NRPS. Transport Focus provided a thorough overview of the consultation process at the time, including an external review of the methodology, a transparent account of the different users views that were submitted, and Transport Focus' responses to those views and proposed next steps. Beyond this formal consultation, the current channels for users to influence the future development of the NRPS are limited, with communications primarily designed to share information about the NRPS, rather than to seek users' views on proposals.
- 1.10 Transport Focus should consider how it might take a more transparent approach to engaging with NRPS statistics users about its current development plans on a more ongoing basis. By setting out its approach to engaging with NRPS users, these users will have greater clarity about Transport Focus' overall approach and where they can contribute to the further development of the NRPS. **To support the transparent development of the official statistics and ensure the NRPS remains relevant to a wide range of users, Transport Focus should set out its approach to publicly engaging with a broader range NRPS users and provide channels for them to contribute to the statistics' ongoing development.**

Accessibility of NRPS outputs

- 1.11 The headline NRPS statistics are free and easily accessible to all users online via the Transport Focus [website](#). Using two mouse clicks from the homepage, users can navigate to the main NRPS [report](#) and 'at-a-glance' [reports](#). A new [data hub](#) was launched in July 2019, allowing users to have access to Detailed NRPS data via an online interactive platform. This encourages the re-use of the headline NRPS statistics in an easily accessible way.

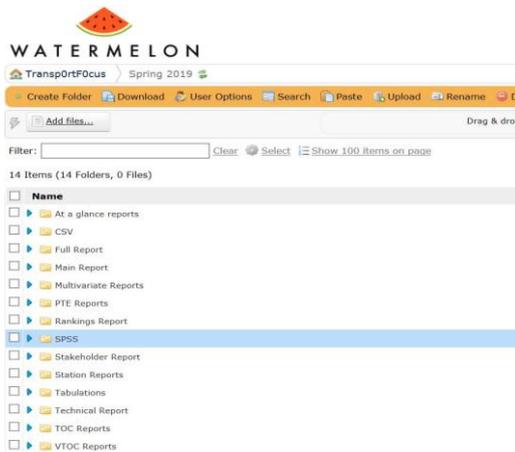
Figure 3: Transport Focus data hub



Source: Transport Focus

1.12 However, TOCs and key stakeholders have access to a more comprehensive suite of detailed NRPS outputs which is not publicly available via a password-restricted site hosted by the NRPS contractor, Watermelon research. During the course of the assessment, we heard from users that they would like to have access to an NRPS time-series to compare levels of passenger satisfaction over time. The current published main report does not include this, yet this information is provided in a more detailed 'Full report' available only on the secure site. Transport Focus informed us that the new data hub now enables users to produce analysis back to wave 1 of the survey.

Figure 4: Screenshot of NRPS secure site



Source: Watermelon research

Figure 5: Screenshot of published reports



Source: Transport Focus

- 1.13 A separate multi-variate drivers of satisfaction report is also only available via the secure site, with many TOC users commenting on the value of this report in particular. The secure site also holds a version of the main NRPS report in CSV format and a separate SPSS microdata file. Both of these would enable further reuse of the NRPS statistics, if they were made available respectively via the Transport Focus website and the [UK Data Service](#). Furthermore, some users of the secure site told us that they found the volume of information overwhelming. Transport Focus informed us that in future, all NRPS data would be available via its data hub on the date of publication.
- 1.14 Users also informed us about a lack of accessible quality and methods documentation to support their use of the NRPS statistics. A general overview of the survey methods is provided at the end of the main NRPS report, but this does not provide straightforward links to more detailed information elsewhere on the website. It is apparent that the most up-to-date technical information is only available via the secure site, with the quality and methods information published on the website being outdated. **To better meet the needs of a wider range of users and enhance the public value and reuse of NRPS statistics, Transport Focus should review its publication strategy to ensure equality of access to the full range of NRPS outputs and at the greatest level of detail possible while remaining non-disclosive. Transport Focus should consult users about how best to present this information and provide clarity about the range of NRPS statistics that users can expect to have access to on the date of publication.**
- 1.15 Transport Focus also produces a range of ad hoc research and publications using data collected from the NRPS. In May 2019, Transport Focus published and submitted an evidence paper [Trust in train operators: an exploration of issues influencing passenger trust in rail](#) as part of the [Williams Rail Review](#). This is a good example of how the NRPS can be used effectively to inform public debate. We suggest Transport Focus improves the signposting on its website between the NRPS statistics and related NRPS research outputs to more clearly illustrate its value. We also suggest that Transport Focus considers the voluntary adoption of the Code of Practice for Statistics for its broader range of data, statistics and analysis that are not published as official statistics. This can be achieved by making a public commitment to uphold the Code's pillars of Trustworthiness, Quality and Value.

Insights from the NRPS

- 1.16 The NRPS measures, on a consistent basis, passengers' satisfaction with their rail journeys, so that the performance of individual, franchised train operating companies (TOCs) can be compared over time. NRPS data for the individual TOCs can also be amalgamated to measure rail passengers' satisfaction over time for GB overall. The measurement of 'journey' satisfaction and not 'overall' satisfaction with an operator was highlighted by users as a limitation of the survey, given that many want to use the NRPS results to gain insights into operators' overall performance. We heard from one user that the results from the NRPS are generalised as overall satisfaction, including by Transport Focus itself. A Transport Focus [press release](#) published in January 2019 is an example of this generalisation '*Passenger satisfaction with rail services has fallen to a 10-year low*'. It is important to recognise this distinction and for Transport Focus to provide clear guidance about what the NRPS statistics does and does not represent, and what its results can and can't be used for and to ensure appropriate presentation of the NRPS statistics with the organisation. Strictly speaking, NRPS statistics should be reporting in the form: 'respondents were satisfied with x% of journeys', rather than 'x% of passengers were satisfied...which is more easily extrapolated to refer to the satisfaction of passengers with overall service. We have significant concerns around the communication of these statistics. It is the responsibility of the producer to provide guidance to users on the appropriate interpretation of statistics and ensure that its own statements and press releases are accurate. Otherwise, there is a significant risk of the NRPS statistics being misrepresented or misused. Transport Focus told us that the last rail journey approach may be more difficult

for some people to understand than a sampling approach based on people, but saw this as a challenge for it to better explain these differences for users.

- 1.17 For official statistics to offer useful insights to users, producers should offer clear guidance and advice about how the statistics can and cannot be used. Transport Focus currently does not offer a meaningful explanation. As highlighted within the 'Waiver' statement published as part of the NRPS report; *'Transport Focus is not responsible for how the information is used, how it is used, how it is interpreted or what reliance is placed upon it'*. This statement is in direct conflict with the Code of Practice, under which it is the responsibility of the producer to present statistics and data clearly, to explain them meaningfully and provide authoritative insights that serve the public good. **To ensure the appropriate use of the NRPS statistics, Transport Focus must provide enhanced guidance about the strengths and limitations of the NRPS statistics including what they should and shouldn't be used for. It is also essential that Transport Focus communicates the NRPS statistics accurately to reduce the risk of the statistics being misrepresented or misused.**
- 1.18 Transport Focus previously published an [NRPS user guidance report](#) which provides general advice about how to use NRPS data, the types of analysis that can be undertaken and accessible information on the likely accuracy of results. The report provides a helpful overview of some aspect of statistical quality, but is quite limited and hasn't been published since 2015. Improved quality information would help to avoid small insignificant changes being reported as actual changes by some TOCs. This seems particularly important to address given operators are obliged to report on passenger satisfaction as part of their franchise agreements. There is currently no up-to date quality information about the margins of error around the NRPS estimates, and in general, public access to up-to-date supporting information is limited. The responsible statistician also plays an important role in providing insight to users and supporting their appropriate use of the statistics. Contact information for the responsible statistician is not included in the NRPS statistics published on the Transport Focus website. However, contact information is included in technical and user guidance reports on the secure Watermelon website. **To support the accurate interpretation and appropriate use of the official statistics, Transport Focus should ensure up-to-date quality measures, methods and quality documentation are published alongside the NRPS statistics each wave; and include the name and contact details of the responsible NRPS statistician in the published official statistics.**
- 1.19 The NRPS statistics are presented objectively but with limited statistical commentary around wider issues affecting the rail network which may impact on levels of passenger satisfaction. With the exception of variables affecting fieldwork, users told us that would like to know what other contributing factors may have influenced rail passenger satisfaction scores. Transport Focus already publishes a range of policy relevant material in its other rail research outputs that could be used to enhance the value of the NRPS statistical commentary. Other relevant rail statistics are also available, for example the Office of Rail and Road produces quarterly statistics on [passenger rail performance](#) including punctuality and reliability measures that might be drawn upon or signposted in the NRPS statistics to highlight a fuller picture of rail service performance in GB. **Transport Focus should enhance the value of the NRPS statistical commentary, adding context and insight from additional sources to help highlight the relevance of the NRPS statistics to pertinent topics that are of interest to users.**

Waiver

Transport Focus has taken care to ensure that the information contained in the NRPS is correct. However, no warranty, express or implied, is given as to its accuracy and Transport Focus does not accept any liability for error or omission. Transport Focus is not responsible for how the information is used, how it is interpreted or what reliance is placed upon it. Transport Focus does not guarantee that the information contained in NRPS is fit for any particular purpose.

Innovation and maximising the public value of the NRPS

- 1.20 The NRPS has been subject of both internal and independent reviews since its first publication in 1999. Transport Focus has made periodic improvements to elements of the NRPS to help ensure it remains relevant and fit for purpose. An [independent technical review](#) of the NRPS was carried out in 2016, by Roberts Miller Associates. A number of recommendations were made as a result which led to two key changes to the survey methodology. A successful pilot was undertaken in spring 2016 and the changes were implemented in spring 2017 onwards. The length of the questionnaire was shortened to tackle the low response rate and an online survey option was introduced for passengers, giving them the choice of completing the survey on paper or online.
- 1.21 Currently, the NRPS is conducted twice a year (two 10-week periods), with waves published for the autumn and spring annually. Autumn wave fieldwork is typically carried out between September and mid November each year, whereas spring wave fieldwork usually starts in late January, or occasionally in mid January, to ensure that it is completed before Easter. Therefore, a principal limitation of the NRPS is that the survey does not reflect the continuous customer experience of rail ‘journeys’ in GB throughout the year. As such, the survey does not measure disruption on the rail network that falls outside of the fieldwork periods. While we recognise that it is important for the NRPS to be consistent, the set spring and autumn snapshots may not truly reflect passenger experience overall. Many users echoed this during our engagement sessions and Transport Focus recognises this having previously explored the introduction of a continuous survey, or additional summer and winter waves. More than one user commented that the timetable change, in May 2018 which caused huge disruption on the rail network, undoubtedly affecting passenger satisfaction with journeys at that time, was not reflected in the NRPS as it occurred outside of the fieldwork period. The impact of disruptions on passenger satisfaction, following the rail timetable changes made in December 2019, was also not measured by the NRPS.
- 1.22 To overcome this issue, some TOCs fund their own additional inter-wave NRPS surveys to complement their bi-annual NRPS results, for other periods throughout the year. The results of these surveys, which are arranged directly with Transport Focus’ contractor are not published but used as management information by such operators. However, some of the operators that we spoke to said that they would be happy to see statistics based on their NRPS inter-wave surveys published. Transport Focus informed us that the additional boosts currently being paid for privately by individual operators, if combined, would be enough to fund an additional two NRPS waves per year. An enhanced sample size would be required to produce data for additional NRPS waves or even year-round passenger satisfaction statistics across all operators, or to understand passenger satisfaction levels for stations and routes at lower levels than the current sample size allows. However, Transport Focus told us that even an enhanced NRPS continuous sample would be unlikely to address users’ requests for robust data on small stations due to the skewed distribution of passengers in GB using around 2,600 stations. It told us that other surveys, including those of the train companies themselves, may be better vehicles for understanding this, though insights may be gained by aggregating NRPS responses from small stations by route or by size.
- 1.23 There is clear demand across the rail industry to have a more continuous measure of rail passenger satisfaction. A regular measure would allow operators to monitor performance more readily, identify issues and be proactive in their responses. Furthermore, in 2016, the Transport Select Committee in its review of [‘The future of rail; Improving the rail passenger experience’](#) concluded that *‘The National Rail Passenger Survey (NRPS) is long-established and methodologically sound, but it could and should be improved to more accurately reflect the everyday experience of passengers’* and recommended that the NRPS be carried out at least quarterly. It also highlighted the need for a broader range of key performance indicators for passenger satisfaction to be presented alongside the NRPS to account for satisfaction beyond individual journeys and surveying the views of non-users of rail travel, including those who were unable to board a train due to overcrowding.

Transport Focus told us that it prepared a costed proposal to conduct continuous interviewing in response to the Transport Select Committee's recommendations, but the Department for Transport decided not to pursue this.

- 1.24 The [Williams Rail Review](#) established in September 2018, has also led to an increased focus by the rail industry to look at ways to improve measurement of passenger satisfaction. The review is looking at the structure of the whole rail industry and the way passenger rail services are delivered. It aims to make recommendations for reform putting the interests of passengers and tax payers at the heart of any changes.
- 1.25 Transport Focus is taking steps to innovate the NRPS, adding value through online data collection and disseminating additional passenger insights from the NRPS in a more-timely way. It has also introduced a 'trust' measure to the NRPS questionnaire which gives a passenger's overall view of a train company. Transport Focus believes this is a more relevant question for assessing the train company brand, rather than satisfaction, which is more appropriate for operational issues. In July 2019, Transport Focus shared its current ideas around *'Getting more from the National Rail Passenger Survey'* with the rail industry and other users. It outlined a number of plans, including piloting follow-up surveys to online respondents, the use of artificial intelligence to identify themes in verbatim comments, and to look at a new tracker survey. We commend Transport Focus for their proactive and engaging approach to innovation and improvement. However, considerable innovation and new or redistributed funding would be required to facilitate additional NRPS waves and more continuous and timely rail passenger satisfaction statistics that better reflect satisfaction with an operators' overall service. Without this investment, the NRPS is unlikely to keep pace with forthcoming changes to the rail industry and increasing demands for more granular, real-time and passenger focused information. **To ensure that the NRPS statistics remain relevant and are more representative of overall rail passenger experience, Transport Focus should take steps to develop the NRPS to measure rail passenger satisfaction on a more continuous basis throughout the year and better reflect satisfaction with an operators' overall level of service.**
- 1.26 In March 2019, the Department for Transport (DfT), submitted an evidence [paper](#) to the Williams Rail Review. The paper outlined the development of an alternative data source of rail passenger satisfaction, namely Wavelength. The programme is being developed by the Rail Delivery Group, and which aims to collect a wider range of information about rail customers' journeys, through an online panel survey. We were told as part of this assessment that all operators would gain access to their own Wavelength data by the end of summer 2019. However, it is unclear what the public value of this data will be in the future. Through our user engagement conversations, some users mentioned the new source as a potential supplementary data source to the NRPS, though many users wanted it in addition to, rather than instead of the established NRPS statistics. Some users raised concerns about sample sizes of Wavelength for detailed analysis and the potential for train operators to misrepresent the information given the data collection would be led by the industry and it could be difficult to hold operators to account. They were also unclear whether its results would be made available to the public.
- 1.27 In light of the forthcoming Williams Rail Review, we encourage Transport Focus to work with the Department for Transport, the Rail Delivery Group, and other partners to develop rail passenger satisfaction statistics that best serve the public interest. They should overcome obstacles and share best practice to ensure that appropriate and valuable statistics on rail passenger satisfaction meet not only operational purposes but also the needs of current and potential users and wider society. This will be essential to ensure that future rail passenger satisfaction statistics offer maximum value to the broadest range of users, at regular intervals and in the greatest level of detail, for the least overall cost.

Table 1: Value – Findings and Requirements

Findings	Examples		Requirement
<p>The NRPS is a valuable data source, with a wide range of uses and users. Engagement with a broad range of users/potential users is currently limited.</p>	<ul style="list-style-type: none"> • Transport Focus primarily engages with rail industry stakeholders and train operating companies • Transport Focus acknowledges more ad hoc engagement with non-industry users has not been a priority 	1	<p>To enhance the public value of the NRPS statistics and further develop its understanding of NRPS users' needs, Transport Focus should engage with a broader range of current and potential users outside of the rail industry, including established statistical groups and organisations.</p> <p>In meeting this requirement, Transport Focus may find it useful to seek advice and guidance from the GSS Good Practice Team.</p>
<p>Extending engagement to a broader range of users would help to ensure that different user perspectives are fed into the future development of the NRPS statistics.</p>	<ul style="list-style-type: none"> • Transport Focus has demonstrated transparent engagement for past NRPS developments • Transport Focus does not invite users views on proposals as an ongoing, transparent way of working 	2	<p>To support the transparent development of the official statistics and ensure the NRPS remains relevant to a wide range of users, Transport Focus should set out its approach to publicly engaging with a broader range NRPS users and provide channels for them to contribute to the statistics' ongoing development.</p>
<p>Transport Focus' overall strategy for publication of the NRPS is not clear. Users do not have equal access to the full range of NRPS statistics that are produced as a broader range of analyses are only made available via a password protected secure site.</p>	<ul style="list-style-type: none"> • Users highlighted the desire to have a published time series • Users highlighted that the volume of outputs available via the secure site can be overwhelming • Transport Focus makes different subsets of the NRPS statistics available through different channels at different times 	3	<p>To better meet the needs of a wider range of users and enhance the public value and reuse of NRPS statistics, Transport Focus should review its publication strategy to ensure equality of access to the full range of NRPS outputs and at the greatest level of detail possible while remaining non-disclosive. Transport Focus should consult users about how best to present this information and provide clarity about the range of NRPS statistics that users can expect to have access to on the date of publication.</p>

Findings	Examples	Requirement
The NRPS statistics can easily be misinterpreted and misused by users.	<ul style="list-style-type: none"> • Users told us that a limitation of the NRPS is that it measures satisfaction of a journey and not overall satisfaction with an operator • The waiver statement offers no assurance that Transport Focus is confident in the NRPS as an official statistic • January 2019 press release published by Transport Focus misrepresents what the NRPS measures 	4 To ensure the appropriate use of the NRPS statistics, Transport Focus must provide enhanced guidance about the strengths and limitations of the NRPS statistics including what they should and shouldn't be used for. It is also essential that Transport Focus communicates the NRPS statistics accurately to reduce the risk of the statistics being misrepresented or misused.
NRPS technical and guidance information on the Transport Focus website is out of date with more-recent material only available from a secure website	<ul style="list-style-type: none"> • The NRPS user report has not been published since 2016 • The latest published version of the NRPS technical report is from 2015 • Name and contact details for the responsible statistician are not published 	5 To support the accurate interpretation and appropriate use of the official statistics, Transport Focus should ensure up-to-date quality measures, methods and quality documentation is published alongside the NRPS statistics each wave; and include the name and contact details of the responsible NRPS statistician in the published official statistics.

Findings	Examples		Requirement
Transport Focus should make improvements to the report to enhance the clarity and insight of the statistics	<ul style="list-style-type: none"> Users told us that they would like to see insightful commentary included Users told us they would like to understand satisfaction scores for operators' overall levels of service 	6	Transport Focus should enhance the value of the NRPS statistical commentary, adding context and insight from additional sources to help highlight the relevance of the NRPS statistics to pertinent topics that are of interest to users.
The NRPS is designed to capture rail passenger satisfaction at snapshots in time and does not reflect true passenger experience	<ul style="list-style-type: none"> Users told us that the NRPS does not measure impacts and changes on the rail network that occur outside of the two 10-week periods each year The survey is based on satisfaction with a previous journey, whereas it is used as a measure of overall operator performance A Transport Select Committee paper highlighted the need for improvements to the NRPS including the needs to publish at least quarterly The rail industry is developing alternative measures of rail passenger satisfaction 	7	<p>To ensure that the NRPS statistics remain relevant and are more representative of overall rail passenger experience, Transport Focus should take steps to develop the NRPS to measure rail passenger satisfaction on a more continuous basis throughout the year and better reflect satisfaction with an operators' overall level of service.</p> <p>We also encourage Transport Focus to work with the Department for Transport, the Rail Delivery Group, and other partners to develop rail passenger satisfaction statistics that best serve the public interest</p>

Chapter 2: Quality

Introduction

- 2.1 Quality means that the statistics and numerical information represent the best available estimate of what they aim to measure at a particular point in time and are not materially misleading.
- 2.2 Quality is analytical in nature and is a product of the professional judgements made in the specification, collection, aggregation, processing, analysis, and dissemination of data.

Findings

Sound methods

- 2.3 Transport Focus occasionally convenes an expert group of rail statisticians from government and research sectors which provides advice on NRPS developments and innovations. Further advice is also provided by Transport Focus' [Statistics Governance Group](#) (SGG). The NRPS methodology has remained broadly consistent since 2003, enabling a long time series which is highly valued by users in the rail industry in particular. The NRPS measures, on a consistent basis, rail passengers' satisfaction with their last journey, so that the performance of individual, franchised train operating companies (TOCs) can be compared over time. NRPS data for the individual TOCs can be amalgamated to measure rail passengers' satisfaction over time for GB overall.
- 2.4 NRPS sampling and weighting is based on an estimate of total 'passenger journeys' across the rail network and a new sampling plan is generated every two years. The survey uses a two-stage sample design for each TOC with different sample sizes set for each TOC to reflect the complexity of routes and the number of passengers that the company carries. Advantages of the rail journey approach include that it focuses the response on a particular current/recent journey, so passenger recall is accurate, is not a generalised opinion about rail services, and is more actionable, as it can be attributed to a particular train, route or station. Transport Focus told us that this also allows other external data to be appended to the survey data, including Public Performance Measurement (PPM) data, which has led to a change in the way that PPM is reported so that it is more passenger centric.
- 2.5 NRPS fieldwork is carried out each spring and autumn for a duration of between 10 and 11 weeks. Questionnaires are distributed to passengers departing from stations on a particular day, during a specific time period. Passengers are given a pre-paid envelope to return completed questionnaires. Alternatively, passengers can choose to complete the questionnaire online through a link to an email address. Once returned, all questionnaires are verified to confirm that they are representative of a true journey and assigned to the appropriate TOC. The results are then weighted to represent passengers using each operator's services in terms of the proportion of commuting, business, and leisure journeys. NRPS data for the individual operators can then be amalgamated to measure rail passengers' satisfaction over time, for Great Britain overall.
- 2.6 The NRPS methods have been developed over time, some of which is documented in published [technical guidance](#). An [independent technical review](#) of the NRPS was carried out in 2014 by Roberts Miller Associates. A number of recommendations were made as a result including a reduction in length of the questionnaire from 12 pages to 8 to help tackle declining response, and to give passengers a choice between completing a paper version of the questionnaire or being sent a link to an online version.
- 2.7 These changes were introduced to the survey methods from spring 2017 onwards. Since then, the proportion of passengers electing to complete the survey online has increased consecutively wave-on-wave, increasing to around 40 per cent in spring 2019, although the

overall NRPS response rate was still only around 25 per cent. In order to limit the length of the questionnaire, separate modules of the questionnaire are rotated across samples and across waves.

- 2.8 Some TOCs informed us that they had seen substantial increases in passenger numbers over time, but that the NRPS sample size had not kept pace with these changes. As previously discussed, an enhanced sample size would be required to produce data for additional NRPS waves or even year-round passenger satisfaction statistics across all operators, or to understand passenger satisfaction levels for stations and routes at lower levels than the current sample size allows.
- 2.9 One TOC also reported having seen increasing differences between the NRPS statistics and its own customer satisfaction survey results. Another user expressed concern that the majority of NRPS responses were from off-peak passengers and that the proportions didn't align with separate Office of Rail and Road statistics. They raised concerns that it may not be practical for interviewers to get through crowded trains to interview commuters at peak times. Transport Focus informed us that it had adjusted the relative NRPS sample sizes for some train companies to ensure train company samples reflect the relative size of the train company, subject to a minimum sample size. They saw users concerns as a methodological misunderstanding which they should seek to address rather than a methodological failing. **To address users' concerns that the NRPS sample is not representative of current rail users and potential changes in sample composition observed for some operators and shown in other official statistics sources, Transport Focus should provide accessible guidance on how the current sampling approach continues to be robust despite such changes.**

Data quality

- 2.10 The NRPS sampling frame is derived from several rail industry administrative sources which are updated every two years. Three datasets are amalgamated to generate estimates of the number of passengers each TOC carries from each station it calls at, and this is used as the basis for the sample design. The sources are:
- ORR data on station entries and interchanges; number of journeys by station (station usage estimates) – (based on LENNON ticketing data, but also considering other information).
 - LENNON data on the number of journeys allocated to each TOC – From the Office of Rail and Road (ORR). These estimates are based on the LENNON ticketing system, but also include adjustments for non-LENNON data where appropriate (e.g. for certain tickets that are not recorded on LENNON)
 - TOC data to inform sampling splits by journey purpose, weekend/weekday and journey estimates (including by station) – particularly important for non-franchised TOCs not necessarily included in ORR data
 - RailPlanner data on the number of services run by each TOC, from each station.
- 2.11 Transport Focus told us that the quality of ORR's station usage estimates had been improving over time, highlighting limitations in a report produced by ORR: [Estimates of Station Usage 2017/18: Methodology and Validation](#), but also stated that this was the only national source of estimates on the number of journeys by station.
- 2.12 Overall, Transport Focus has a limited understanding of the quality of the data sources used to produce the sample and links with the data suppliers to better understand their strengths and limitations should be strengthened. Transport Focus publish very little around strengths and limitations of the data sources used in NRPS sampling and weighting and how these may impact the NRPS results. **To support the production of assured official statistics, Transport Focus should assure itself about the quality of the administrative data used in NRPS sampling and weighting is sufficient for the**

intended uses. and provide an accessible account of its findings for users. In meeting this requirement Transport Focus should refer to the Authority's [Administrative Data Quality Assurance Toolkit](#).

Assured statistics

- 2.13 To help ensure the quality of the NRPS survey operation Transport Focus specifies the expected standards required within its Invitation To Tender (ITT) documentation to ensure that that all fieldwork is done using suitably trained and managed fieldworkers and that statistical analysis of data is carried out using suitably experienced staff. The ITT also states that the survey has to adhere to certain standards in area such as quality management, confidentiality and access to statistical data, pre-release access due to its official statistics status.
- 2.14 As previously discussed (paragraph 1.18), Transport Focus should enhance its guidance about the strengths and limitations of the NRPS statistics and ensure up-to-date methods and quality documentation is published each wave. More broadly, very little information is available about Transport Focus' overall approach to quality management and the measures taken by Transport Focus to ensure quality issues are minimised. This could include Transport Focus' regular processes for reviewing and monitoring the quality of the NRPS, comparisons made to any other relevant statistics or data sources and its approach to periodic external quality and methodology reviews. **To demonstrate its commitment to assured official statistics, Transport Focus should provide a transparent account of its overall approach to statistical quality management.**

Table 2: Quality – Findings and Requirements

Findings	Examples	Requirement
User informed us that the NRPS sample profile has not kept pace with changes in the rail passenger flows.	<ul style="list-style-type: none"> • TOC users told us that the peak/off-peak split between the NRPS and other sources was not comparable and the NRPS sample had not kept pace with increases passenger numbers 	8 To address users' concerns that the NRPS sample is not representative of current rail users and potential changes in sample composition observed for some operators and shown in other official statistics sources, Transport Focus should provide accessible guidance on how the current sampling approach continues to be robust despite such changes.
Transport Focus has demonstrated limited understanding of the quality of the administrative data used to produce the NRPS sampling frame.	<ul style="list-style-type: none"> • Transport Focus has not published information about the relative strengths and weaknesses of the three administrative data sources that are used 	9 To support the production of assured official statistics, Transport Focus should assure itself about the quality of the administrative data used in NRPS sampling and weighting is sufficient for the intended uses, and provide an accessible account of its findings for users. In meeting this requirement Transport Focus should refer to the Authority's Administrative Data Quality Assurance Toolkit.

Findings	Examples	Requirement
Transport Focus does not publish any information about its overall approach to ensuring statistical quality of the statistics it produces.	<ul style="list-style-type: none"> <li data-bbox="593 206 995 331">• The NRPS Invitation to tender includes some aspects of quality that are managed by the NRPS contractor <li data-bbox="593 340 995 474">• Transport Focus' overall approach to quality management isn't clear or transparent 	10 To demonstrate its commitment to assured official statistics, Transport Focus should provide a transparent account of its overall approach to statistical quality management.

Chapter 3: Trustworthiness

Introduction

- 3.1 Trustworthiness means that the statistics and other numerical information are produced free from vested interest, based on the best professional judgement of statisticians and other analysts.
- 3.2 Trustworthiness is a product of the people, systems and processes within organisations that enable and support the production of statistics and other numerical information.

Findings

Statistical governance and leadership

- 3.3 The production of the NRPS is overseen by Transport Focus' Head of Insight, who performs the role of Head of Profession for Statistics and the organisations Statistics Governance Group (SGG). The SGG meets quarterly and is comprised of the Head of Profession for Statistics, the Transport Focus Chief Executive, the Head of Corporate Governance, three non-executive board members and project managers for each of the organisation's transport surveys. The group provides guidance on key decisions and approves proposals put forward by the separate analytical teams. The Head of Profession informed us that although the SGG provides a guidance and approval role, the Head of Profession took final decisions relating to the production and publication of the NRPS statistics.
- 3.4 The Head of Profession told us that professional engagement with the GSS was not as established as it might be due to the NRPS statistics being the only official statistics it produced. The Head of Profession does not attend GSS Heads of Profession meetings. Transport Focus analysts have limited awareness of the consultancy services and resources that are available through the GSS' Good Practice Team, the GSS Methodology Advisory Service and in the broader Best Practice and Impact team.

Release practices

- 3.5 The NRPS statistics and supplementary information are presented impartially and objectively, with results displayed consistently for each TOC, route and region. More generally, we found no evidence of any action or public statement by Transport Focus that might undermine confidence in the independence of the NRPS statistics once published.
- 3.6 However, there have been five reported breaches of the Code of Practice between 2014 and 2019 relating to the unintended release of NRPS results in advance of their publication. The reasons behind each breach vary, although primarily related to breaches by individuals granted 24 hours pre-release access to NRPS statistics in their final form ahead of their publication, sharing headline NRPS results with individuals that are not on the list. Two of these breaches resulted in headline NRPS findings entering the public domain via the media before publication of the NRPS statistics.
- 3.7 As a result, Transport Focus has re-emphasised the responsibilities of those granted access and informed us that it reviews the pre-release list ahead of each publication and aims to keep number of individuals granted access to a minimum. Transport Focus also has a published [pre-release access policy](#) and provided us with a copy of its autumn 2018 pre-release access list as part of its evidence for assessment. The risk of a breach increases as more individuals are granted access and while the list shared with us is shorter than the [latest published version](#) from spring 2016, it is still considerably long, including over 90 listed individuals external to Transport Focus, with some of the individual entries covering multiple managers and advisors. **In the interest of transparency and to**

support confidence in the production of the official statistics, Transport Focus should reduce the number of individuals granted pre-release access to NRPS statistics in their final form; provide justifications to us for each individual listed; and ensure that it publishes an up-to-date list alongside the NRPS statistics when published.

- 3.8 Transport Focus also maintains a list of individuals granted pre-release access for up to three weeks before publication for [exceptional circumstances](#), which include quality assurance and operational purposes. However, the list contains names of a large number of senior TOC executives. The Head of Profession informed us that these external individuals were granted access to their company's NRPS results for an extended period for their operational purposes. However, such access is only appropriate for organisations utilising their own internal data for operational purposes, such as internal management information that the organisation later uses to produce official statistics. **To support confidence in the production of the official statistics, Transport Focus should ensure that exceptional early access to the NRPS statistics is only granted to individuals that are essential for the quality assurance of the NRPS statistics or Transport Focus' operational purposes, and not the operational purposes of external organisations.**
- 3.9 Statistics from the NRPS are published at roughly the same intervals each year. Regular NRPS users are aware of the broad dates due to the longevity of the survey while others receive direct notifications from Transport Focus about the availability of the latest results, available either on the website or through the secure site. However, it does not currently publish a forward schedule of NRPS statistics releases. Transport Focus told us that it used to publicise releases using the UK National Statistics Publication Hub before it ceased and that it was unaware of its [replacement on GOV.UK](#). **To promote awareness of NRPS statistics to users and support trustworthiness as a producer of official statistics, Transport Focus should pre-announce NRPS statistics using an online release calendar, with a provisional 12 months forward schedule, confirming specific release dates at least four weeks before publication.**

Transparent management and resources

- 3.10 Transport Focus publishes some helpful information on its website demonstrating transparency in relation to the future work and development of the NRPS. For example, insights from the NRPS feature in its current [organisational workplan](#) and its 2016 [consultation page](#) around the further development of the NRPS. As previously discussed (paragraph 1.10), to support the transparent development of the official statistics, Transport Focus should set out its approach to engaging with a wider range of NRPS users on an ongoing basis and establish channels for them to contribute to the statistics' development.
- 3.11 In relation to resources it became apparent during the assessment that many industry users had regular helpful contact with one Senior Insight Advisor in particular and who had been their main point of contact on the NRPS for several years. One user questioned whether there was sufficient knowledge in the rest of the team should the staff member concerned leave the team for any reason. Transport Focus told us that it had taken steps to build resilience across the insight team and that a number of insight analysts now had NRPS experience. Transport Focus also highlighted that Insight advisors have opportunities for professional development and training, including in areas such as SPSS data analysis skills, and General Data Protection Regulations. The GSS offers a range of free training courses and seminars for government statisticians and analysts that align with the principles of the Code of Practice broader analytical competencies. **To support the further development of NRPS statistics and the professional development of NRPS analysts in line with the standards of the Code of Practice for Statistics, Transport Focus should seek opportunities for broader professional engagement with the GSS and utilise the resources that are available.**

Table 3: Trustworthiness – Findings and Requirements

Findings	Examples	Requirement
<p>The NRPS 24-hour pre-release access list is long and has not been published for several NRPS waves.</p>	<ul style="list-style-type: none"> • The most recent published pre-release access list is from 2016 • The pre-release access list provided as evidence for the assessment included over 90 listed individuals that were external to Transport Focus, and some of the individual listed entries were for multiple managers and advisors 	<p>11 In the interest of transparency and to support confidence in the production of the official statistics, Transport Focus should:</p> <ul style="list-style-type: none"> a) reduce the number of individuals granted pre-release access to NRPS statistics in their final form; b) provide justifications to OSR for each individual listed; and c) ensure that it publishes an up-to-date list alongside the NRPS statistics when published.
<p>Transport Focus maintains a list of individuals with exceptional access to the NRPS results three weeks for quality assurance and operational purposes which contains senior rail industry directors.</p>	<ul style="list-style-type: none"> • Transport Focus provides senior rail industry directors access to their own NRPS data for operational purposes 	<p>12 To support confidence in the production of the official statistics, Transport Focus should ensure that exceptional early access to the NRPS statistics is only granted to individuals that are essential for the quality assurance of the NRPS statistics or Transport Focus' operational purposes, and not the operational purposes of external organisations.</p>
<p>Transport Focus does not pre-announce the NRPS statistics through a forward release calendar.</p>	<ul style="list-style-type: none"> • Transport Focus used to publicise its releases using the UK National Statistics Publication Hub before it ceased • Transport Focus was unaware of the release calendar on GOV.UK 	<p>13 To promote awareness of NRPS statistics to users and support trustworthiness as a producer of official statistics, Transport Focus should pre-announce NRPS statistics using an online release calendar, with a provisional 12 months forward schedule, confirming specific release dates at least four weeks before publication.</p>

Findings	Examples	Requirement
<p>Transport Focus is an independent watchdog at arm's length from the Department for Transport but has few professional links with the GSS.</p>	<ul style="list-style-type: none"> • The Transport Focus' Head of Profession does not attend GSS HoPs' meetings • Transport Focus was not aware of the GSS Good Practice Team or Methodology Advisory Service • Transport Focus analysts undertake in house development and training but are not linked into GSS professional development networks 	<p>14 To support the further development of NRPS statistics and the professional development of NRPS analysts in line with the standards of the Code of Practice for Statistics, Transport Focus should seek opportunities for broader professional engagement with the GSS and utilise the resources that are available.</p>

Annex 1: Next Steps

Responding to the assessment report: what the Office for Statistics Regulation and Transport Focus should expect from each other

A1.1 The publication of the Assessment report represents a key milestone in the assessment process but should not be viewed as the end point. The next phase, to meet the Requirements set out in this report, is critical to delivering the value, quality and trustworthiness to achieve and maintain National Statistics status. The next steps are as follows:

- immediately following the publication of the report, the Office for Statistics Regulation will arrange a meeting with the statistics team to talk through the detail of the Requirements and to ensure a common understanding
- the HoP can follow up with the Assessment Programme Manager about the Director General for Regulation's letter that accompanies this Assessment Report. The letter: draws out the key findings; provides advice about where the statistics team is likely to need senior management support and direction and conveys any findings that have wider implications for the producer body and statistical system
- the HoP is encouraged to:
 - i) develop an action plan to meet the Requirements to the timetable set out in paragraph ES.11 of this report
 - ii) agree the action plan with their senior management, and confirm that it is appropriately resourced
 - iii) share the action plan with the Office for Statistics Regulation, publish it alongside the statistics, and explain to users and suppliers how it will engage with them in delivering the plan
 - iv) seek out peers and support services that can help in delivering the plan – for example, [the GSS Good Practice Team](#)
 - v) agree with the regulatory team, how often, and in what form, the statistics team would like to engage about progress against the action plan – for example, some teams choose to meet with the regulatory team once a month
- the statistics team should provide full formal written evidence to the Office for Statistics Regulation by the deadline of April 2020 as set out in paragraph ES.11 of this report. There is no set format for reporting, except that Transport Focus should demonstrate that it has addressed the findings given in Tables 1 to 3 and provide links to any published or internal documents as support
- the regulatory team will review the evidence within 10 working days and arrange to provide feedback to the statistics team. As part of this process, the regulatory team will talk again to users to establish how their experience of the statistics has changed. When the regulatory team is satisfied that the Requirements have been fully met, their conclusions will be quality assured by Office for Statistics Regulation's senior management and then presented to the Authority's Regulation Committee to confirm designation. The Director General will then write publicly to the lead official to confirm the decision
- in the event that Requirements are not fully met within the agreed timetable, the Authority will implement [escalation procedures](#).

A1.2 Based on experience, the Office for Statistics Regulation strongly encourages statistics teams to:

- engage with the detailed thinking of the Assessment report, and revisit it regularly. The regulation team will be seeking evidence that the statisticians are demonstrating curiosity and are challenging their own thinking around delivering value, quality and trustworthiness. The Requirements in this report should not be viewed as a simple checklist
- view the responsibility for meeting the Requirements as falling to the organisation as a whole, not just the team that produces the statistics.
- engage users early, not just to keep them updated, users can often offer valuable insight and expertise
- contact the regulatory team at any time if there are any questions or concerns

A1.3 Responsibility for complying with the Code of Practice does not end with the award of the National Statistics designation. It is the statistics producers' responsibility to maintain compliance and also to improve the statistics on a continuous basis. The Office for Statistics Regulation encourages statistics producers to discuss promptly with the regulatory team any concerns about whether its statistics are meeting the appropriate standards. National Statistics status can be removed at any point when the highest standards are not maintained, and reinstated only when standards are restored.

