

Transport Focus initial response to Office for Statistics Regulation’s Assessment of compliance with the Code of Practice for Statistics requirements and action plan January 2020 with progress as at end of November 2020.

This document outlined Transport Focus proposals to address each of the requirements of the OSR assessment. This has now been updated to show what progress has been made to date.

Value – Findings and Requirements

| OSR Findings | OSR Examples | OSR Requirement | Transport Focus Comment and plans & timeline to address | Progress as at November 2020 | Status as at November 2020 |
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| 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>Transport Focus primarily engages with rail industry stakeholders and train operating companies</p> <p>Transport Focus acknowledges more ad hoc engagement with non-industry users has not been a priority</p> | 1 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. | <p>We will engage with GSS Good Practice Team in January. We expect that they will provide details of some organisations. We will also identify other current and potential users (such as academics) using contacts and research.</p> <p>We will produce a document outlining the survey methods, potential uses and available data with links to our website (including the data hub) and distribute to all those identified.</p> | <p>We have engaged with the Good Practice Team.</p> <p>We have been asked to do a TSUG Seminar (date TBC) that will include the NRPS that will assist in identifying users.</p> <p>The document (the Spring 2020 Technical report) was produced in July 2020, put on the Transport Focus website and sent to key survey users.</p> | In Progress |

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| <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> | <p>Transport Focus has demonstrated transparent engagement for past NRPS developments</p> <p>Transport Focus does not invite users views on proposals as an ongoing, transparent way of working</p> | <p>2</p> | <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>We will continue to hold NRPS industry update days after the publication of every wave and will expand the invitation list.</p> <p>We will look at other ways of consulting with other current and potential users, which may include using our website and regular newsletter to invite contact.</p> | <p>NRPS Industry day planned after publication of the Williams Review. This was originally planned for the spring (timing still TBC).</p> <p>Consultation with users is on hold due to other current priorities and uncertainties regarding the NRPS. Both the Autumn 2020 and Spring 2021 NRPS waves are unable to take place.</p> | <p>On Hold / In Progress</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> | <p>Users highlighted the desire to have a published time series</p> <p>Users highlighted that the volume of outputs available via the secure site can be overwhelming</p> <p>Transport Focus makes different subsets of the NRPS statistics available through different channels at different times</p> | <p>3</p> | <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> | <p>We will consult with GSS Good Practice Team and with users and suppliers about additional access to reports and better signposting to ensure all can benefit from what is available.</p> <p>As part of our next industry day, we will consult users about current reporting formats and timings and potential improvements.</p> <p>Linked to requirement 2 – the improvements to channels for contact will make it easier for users to request access to data.</p> | <p>We have consulted the Good Practice Team and they have given us guidance. Contact details of the responsible member of staff have been added to the main report and are being added to the website. We also made some improvements to access this wave (for example more information and reports were available on our website when we published the latest wave), with further improvements planned for the next wave's publication.</p> <p>Industry day currently on hold.</p> | <p>Partly Achieved</p> <p>(Further improvements planned for next wave (timing TBC) and Industry day on hold)</p> |

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| <p>The NRPS statistics can easily be misinterpreted and misused by users.</p> | <p>Users told us that a limitation of the NRPS is that it measures satisfaction of a journey and not overall satisfaction with an operator</p> <p>The waiver statement offers no assurance that Transport Focus is confident in the NRPS as an official statistic</p> <p>January 2019 press release published by Transport Focus mis-represents what the NRPS measures</p> | <p>4</p> | <p>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.</p> | <p>We will produce enhanced guidance notes around how data should be interpreted and considerations / warnings around its use.</p> <p>We will review the waiver statement.</p> <p>These will be made available on our website and circulated to the external users we have relationships with and internally.</p> | <p>An enhanced NRPS User Guidance document has been produced for the Autumn 2019 and Spring 2020 NRPS waves.</p> <p>The waiver statement has been revised. This was incorporated in our main report.</p> <p>A new simple 'introductory guide' to the NRPS has been produced. This will be useful to new users of the survey. This was put on our website in July 2020 (along with other NRPS Spring 2020 technical guidance documents) and sent to users.</p> | <p>Achieved</p> |
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| <p>NRPS technical and guidance information on the Transport Focus website is out of date with more-recent material only available from a secure website</p> | <p>The NRPS user report has not been published since 2016</p> <p>The latest published version of the NRPS technical report is from 2015. Name and contact details for the responsible statistician are not published</p> | <p>5</p> | <p>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.</p> | <p>We will ensure that up-to-date quality measures, methods and technical 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. We will produce enhanced guidance notes around how data should be interpreted and considerations / warnings around its use.</p> | <p>As mentioned in '4' above an enhanced NRPS User Guidance document for Autumn 2019, and Spring 2020, was produced (in July 2020). This includes additional quality measures, methods and technical information. The name and specific contact details for the 'NRPS Statistician' have been added to the NRPS Main report.</p> | <p>Achieved</p> |
| <p>Transport Focus should make improvements to the report to enhance the clarity and insight of the statistics</p> | <p>Users told us that they would like to see insightful commentary included</p> <p>Users told us they would like to understand satisfaction scores for overall services</p> | <p>6</p> | <p>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.</p> | <p>We intend to produce more analysis of the data on a regular basis, including use of the online follow-up surveys in our reporting between waves. We will continue to identify potential further analysis of NRPS.</p> | <p>We did another NRPS follow-up survey during the Spring 2020 wave after a consultation with key Stakeholders regarding relevant topics to include. This is planned to be published / circulated in November 2020.</p> <p>Further NRPS follow-up surveys planned in future waves (timings TBC).</p> | <p>Partly Achieved (report to be published / circulated soon)</p> |

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| <p>The NRPS is designed to capture rail passenger satisfaction at snapshots in time and does not reflect true passenger experience</p> | <p>Users told us that the NRPS is insensitive to impacts and changes on the rail network that occur outside of the two 10-week periods each year</p> <p>The survey is based on satisfaction with a previous journey, whereas it is used as a measure of overall operator performance</p> <p>A Transport Select Committee paper highlighted the need for improvements to the NRPS including the needs to publish at least quarterly.</p> <p>The rail industry is developing alternative measures of rail passenger satisfaction</p> | <p>7</p> | <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> | <p>Making the NRPS continuous has been an ambition for some time, but clearly is a significant exercise from a financial and technical perspective.</p> <p>We agree that industry collaboration is needed to achieve, and some discussions have already been held. While some progress can be made towards this, a longer-term strategy is required. In view of potential changes to the structure of the rail industry, we propose reviewing after the outcome of the Williams Review is known.</p> | <p>This recommendation is to be reviewed following publication of the Williams Review.</p> | <p>On Hold</p> |
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Quality – Findings and Requirements

| Findings | Examples | OSR Requirement | Transport Focus Comment and plans to address | Progress as at November 2020 | Status as at November 2020 |
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| User informed us that the NRPS sample profile has not kept pace with changes in the rail passenger flows. | 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. | We will produce enhanced guidance notes around method / sample / weighting and interpretation. This will be made available on our website and circulated to the external users we have relationships with and internally (for dissemination to stakeholders) by July 2020. | As also mentioned above, enhanced NRPS Technical and User Guidance reports were produced for the Spring 2020 wave - published in July 2020. These were put on our website and circulated to users. | Achieved |

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| <p>Transport Focus has demonstrated limited understanding of the quality of the administrative data used to produce the NRPS sampling frame.</p> | <p>Transport Focus has not published information about the relative strengths and weaknesses of the three administrative data sources that are used</p> | <p>9</p> | <p>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.</p> <p>In meeting this requirement Transport Focus should refer to the Authority's Administrative Data Quality Assurance Toolkit.</p> | <p>We will refer to the Authority's Administrative Data Quality Assurance Toolkit.</p> <p>We will obtain as much information as possible from the providers of administrative data provided including around the source, checking procedures and frequency of updates. We will publish our assessment.</p> <p>If necessary, we will provide guidelines/ training to suppliers to improve.</p> | <p>The Authority's Toolkit has been referred to and a new Quality Assurance document has been produced (this was published alongside the Spring 2020 Main report).</p> <p>The procedure detailed will be followed for future NRPS waves.</p> | <p>Achieved</p> |
| <p>Transport Focus does not publish any information about its overall approach to ensuring statistical quality of the statistics it produces.</p> | <p>The NRPS Invitation to tender includes some aspects of quality that are managed by the NRPS contractor</p> <p>Transport Focus' overall approach to quality management isn't clear or transparent</p> | <p>10</p> | <p>To demonstrate its commitment to assured official statistics, Transport Focus should provide a transparent account of its overall approach to statistical quality management.</p> | <p>We will produce this document to outline our approach – consulting GSS, DfT and OSR as necessary.</p> <p>This was made available on our website and circulated to the external users we have relationships with and internally by July 2020.</p> | <p>The Quality Assurance document mentioned in '9' above includes requirement 10 as well.</p> | <p>Achieved</p> |

Trustworthiness – Findings and Requirements

| Findings | Examples | OSR Requirement | Transport Focus Comment and plans to address | Progress as at November 2020 | Status as at November 2020 |
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| The NRPS 24-hour pre-release access list is long and has not been published for several NRPS waves. | <p>The most recent published pre-release access list is from 2016</p> <p>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> | <p>1 1</p> <p>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>We will publish access list with next wave’s results (Autumn 2019) and will then review all individuals on the list and provide justification or remove for future waves.</p> <p>More generally we will consult with users around rationalisation of the list for future waves. We expect some resistance from users to this, so expect to have to manage this process carefully. We can consider removing the 3-week period completely and publishing results sooner. There are pros and cons to this, so wish to discuss with OSR. Progress can be made next wave, but caution needed.</p> | <p>The NRPS 24-hour access list for the Spring 2020 wave was published on the same day as publication of the Spring 2020 results on 2nd July.</p> <p>Consultation with users around rationalisation of the list to be considered next wave, though timing of next wave is to be confirmed currently.</p> | In Progress |

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| <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</p> | <p>Transport Focus provides senior rail industry directors access to their own NRPS data for operational purposes</p> | <p>1 2</p> | <p>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>As with requirement 11 some progress can probably be made next wave, but this will need some careful planning. Timing of next NRPS wave to be confirmed.</p> | <p>The access list for those Stakeholders who receive results three weeks in advance was published on the same day as publication of the Spring 2020 results on 2nd July. Consultation with users around rationalisation of the list to be considered next wave (as per requirement 11).</p> | <p>In Progress</p> |
| <p>Transport Focus does not pre-announce the NRPS statistics through a forward release calendar.</p> | <p>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> | <p>1 3</p> | <p>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> | <p>We will produce this 12-month forward schedule using an online release calendar. This will also be made available on our website and circulated to the external users we have relationships with.</p> | <p>Given current uncertainties we have not yet done this requirement (beyond the already published Spring 2020 wave). When things become clearer our plans for the next 12 months will be put on our website and circulated to users.</p> | <p>In Progress</p> |

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| <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> | <p>The Head of Profession does not attend GSS HoPs' meetings. Transport Focus was not aware of the GSS Good Practice Team or Methodology Advisory Service. Analysts undertake in house development and training but are not linked into GSS professional development networks</p> | <p>1 4</p> | <p>To support 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 available.</p> | <p>DfT have offered to assist with introducing us to support available. We will work with them and OSR – we aimed to become involved by April 2020 (and have done so).</p> | <p>We have engaged with the GSS Good Practice Team.</p> <p>David Greeno has joined the 'GSS Slack' community. 'Slack' allows Transport Focus to collaborate with colleagues across the GSS. There is also potential access to training.</p> <p>We will also keep an eye open regarding attending cross-GSS events like the GSS Methodology conference. Transport Focus is attending the online GSS Methodology conference in December 2020.</p> | <p>In Progress</p> |
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Proposed timeline of actions

| | Jan'20 | Feb | Mar | Apr | May | Jun | Jul | Aug | Sept | Oct | Nov | Dec | 2021 |
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| Publication of results | 28 | | | | | | 2 | | | | | | TBC |
| Requirement 1 | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | → |
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| Requirement 4 | █ | █ | █ | █ | █ | █ | ● | | | | | | |
| Requirement 5 | █ | █ | █ | █ | █ | █ | ● | | | | | | |
| Requirement 6 | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | ● | |
| Requirement 7 | Unable to commit to fixed actions within timeframe other than commitment to continue/ boost industry engagement | | | | | | | | | | | | |
| Requirement 8 | █ | █ | █ | █ | █ | █ | ● | | | | | | |
| Requirement 9 | █ | █ | █ | █ | █ | █ | ● | | | | | | |
| Requirement 10 | █ | █ | █ | █ | █ | █ | ● | | | | | | |
| Requirement 11 | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | → |
| Requirement 12 | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | → |
| Requirement 13 | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | █ | → |

Requirement 14

