

## **National Express Group – Response to the Office of the Rail Regulator consultation on the proposed change to License Conditions on Passenger Information**

### **Introduction**

National Express Group operate two rail franchises, National Express East Anglia (NXEA) and C2C, carrying over 2 million customers every week from London to Essex, Hertfordshire and the East Anglia region.

We are committed to ensuring that our customers have access to the information they need to plan and undertake journeys on our services and understand impact that delays and disruption have on them. We therefore welcome and support the focus of the Office of the Rail Regulator (ORR) on this issue.

The Autumn 2010 wave of the National Passenger Survey undertaken by Passenger Focus looked at satisfaction amongst those experiencing delays to their journey and showed our highest level of satisfaction amongst National Express East Anglia passengers and continued satisfaction levels above the industry average amongst C2C passengers.

Despite this, we recognise that this satisfaction remains considerably lower than overall passenger satisfaction and we are working to improve this.

### **Working to Improve**

As an organisation we have begun work to improve the flow of information when our services are disrupted. This includes working to improve the decisions and flow of information from our Integrated Control Centres, looking at additional ways we can provide information to customers before they travel as well as at stations and trains. We are also looking to build on our existing review processes in order to ensure that we learn lessons from incidents when they occur.

National Express East Anglia have recently appointed a Customer Communication Manager who is tasked with reviewing our current performance in this area and coordinating our approach to improving information to customers. We are one of the first operators to appoint a dedicated post to improve the way we handle disruption. In addition we have recently launched a number of key initiatives within the business:

Firstly, our 'Right Time Railway' initiative is focused on improving the number of NXEA and C2C trains which depart and arrive on time thereby addressing minor delays which cause frustration to our customers.

The 'Just a Minute' briefing aims to improve the speed with which NXEA drivers and conductors pass information on to our passengers when there is disruption.

C2C have consolidated all of the information flows into a single source in order to ensure consistency across the information pushed out to the web, information systems on stations and the information provided to staff. They have also pre-loaded contingency and emergency timetables into the on station information systems in order to ensure they can be uploaded quickly to provide accurate information to customers.

### **Working with the Industry**

We recognise that these initiatives cannot be achieved in isolation and are therefore committed to working with others within the industry to deliver improvements to customers.

We play an active part in the wider industry initiative to improve information during disruption and have already adopted a number of the workstreams highlighted in the ATOC Good Practice Guide. These include implementation of the key milestones for the introduction Customer Service Level 2 and we have now trained all of our principle control staff through the industry Key Milestone training.

### **Network Rail**

Network Rail is a key provider of information and we welcome the recognition of this in the consultation document. The information Network Rail provides to us as an operator is essential. For example, the information provided to drivers through general calls provides essential support to drivers in delivering good quality information through the 'Just a Minute' initiative. We therefore welcome the ORR's acknowledgement of the role that they play.

We are, however, concerned that this proposal effectively splits the process of information provision into two distinct areas with no overarching responsibility for the process as a whole.

We are also concerned that the license condition may create a perverse incentive on operators during very serious disruption (for example during very poor winter weather) when 'best endeavors' may previously have been made, but could now risk breaching the license condition.

## **Operator License Amendments**

We are concerned at the ORR's proposal to alter the Operators License as we do not believe this is the best mechanism by which to achieve the aim of improving information. The franchising model offers a more suitable mechanism, by which ministers can specify what, if any additional enhancements and improvements they would like operators to make to the provision of information.

## **Other concerns**

Finally we are concerned that the additional funding obligations which may be placed on operators are not clearly identified, nor is the way in which any such enhanced obligations may be funded, particularly where the responsibility for delivery is split between ourselves and other parts of the industry.

In addition, we are concerned that there is no clearly laid out enforcement process and we would therefore welcome further clarity around the way in which this license condition would be consistently and fairly enforced.

## **Next Steps**

We remain committed to improving the quality of information we provide during disruption to our services and therefore will continue to work both internally and externally with the wider industry to drive up the experiences of our customers. We would therefore welcome further dialogue about the direction and details of this process.