

National Highways' Improvement Plan following ORR's Investigation

September 2024

Document Control

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Introduction

In February 2024, ORR launched an Investigation into National Highways performance, capability and delivery. This Investigation concluded in June 2024 and ORR found National Highways in breach of its Licence in regard to Condition 7.3 (e), which covers the provision of ‘any other data or information’ ORR may reasonably require to fulfil its statutory functions.

ORR’s Board however concluded that the two organisations can together achieve a positive outcome through the development, implementation and delivery of a formal, timebound Improvement Plan, that would bring National Highways back in to compliance with its Licence.

Furthermore, ORR’s Decision Letter stated that:

‘National Highway attitude and approach to engaging with the Investigation, the tone of its response to the Case to Answer Letter, its acceptance that it must improve and its proactivity in identifying specific areas where it would seek to do so, gave us confidence that the company will engage closely with us as it develops a formal, timebound Improvement Plan to bring it back into compliance with its Licence. This is further supported by its inclusion of a commitment to do this in the Delivery Plan Update (DPU) for 2024-25.’

Overall, this plan will

- Remedy the deficiencies identified by both ORR and National Highways during the Investigation.
- Demonstrate National Highways’ openness, agility and commitment to cultural change to respect and understand the role of ORR.
- Embrace the importance of transparency.
- Set out how National Highways is committed to mature as a data and information manager.
- Include the additional improvements identified by both organisations in the Investigation Case to Answer Letter, Evidence Report and Decision Letter.



Getting Back into Compliance with Our Licence

ORR has statutory duties that contribute to driving more efficient and effective performance by National Highways for the benefit of road users, communities and the taxpayer. To enable ORR to fulfil these statutory duties, we must collect record and provide data and/or information under Licence Condition 7.3e.

In its Investigation, ORR identified the following areas, where it assessed National Highways to be non-complaint with this requirement.

- During the Investigation, ORR identified instances where National Highways held material that it could and should have shared with ORR sooner.
- The examples, highlighted in ORR's Case to Answer Letter, were drawn from instances where ORR requested, or expected us to proactively provide this type of data or information, primarily when an emerging concern or risk had been identified by ORR or by us.
- The Investigation also identified instances where National Highways did not hold data or information that ORR needed to carry out its statutory functions, that it considered we should reasonably hold.
- ORR uses this type of data and information to help it understand how we manage and mitigate risks before they crystallise into issues that have negative impacts on road users.

This Improvement Plan sets out how we will demonstrate to ORR that we are committed to getting back into compliance with our Licence.

The overriding principle of this plan is to improve the quality, quantity and timeliness of information to ORR.

Overview of the Plan


































To address ORR's findings in the Investigation, we have segmented our improvement actions into three themes with eight focus areas as detailed below. The overriding principle of this plan, and the three themes set out below, is to improve the quality, quantity and timeliness of the information and data provision by National Highways to ORR. In the document we also set out where activity is **new** or **an extension of current work**. We have included regular review points in the plan to test progress with ORR and will adapt the plan for any specific focus areas.



The delivery of this plan will be led by National Highways' Performance and Regulatory Compliance (PRC) Division, with input from relevant key stakeholders within the business.

Aligning our planned activities to ORR's Investigation findings

The following table maps how the activities in this plan address the findings from the ORR investigation. The activities are designed as a package to cover the technical and procedural aspects of information and data provision – quality, quantity and timeliness.

ORR's Findings	1.1 Improve Provision of Data and Information to ORR	1.2 Business as Usual Improvements	1.3 Implement the Recommendations of the Rebel Group Report	2.1 Internal ORR Awareness Training	2.2 ORR Engagement	2.3 ORR Reporting Engagement & Support	3.1 Setting the Framework for Success for the next RIS	3.2 Performance Framework Improvements
Data, Information and Transparency								
Openness & Agility								
Providing the right information at the right time								
Organisational Issues and Capacity								
Cultural Change								
Mature as a Data and Information Manager								
Remedy the deficiencies Identified during the Investigation								
Positive Long-Term Impacts and Setting National Highways up for Success								

Overview of Activities Contained in the Improvement Plan

The following table is a summary of the activities in the plan within each of the focus areas.

	Focus Area	Activities	
Theme 1 - Getting back into compliance & improvements to business as usual	1.1 - Improve provision of data and information to ORR	<ul style="list-style-type: none"> • National Incident Liaison Officer (NILO) and media alerts • Improve format and processes for ORR information requests • Develop and agree Data Sharing Protocol from April 2025 	<ul style="list-style-type: none"> • Quarterly review of data provision feedback with ORR • Develop guidelines on 'good' provision for data for ORR • Improvements to cyclical meeting action completion and query management
	1.2 - Business as usual improvements	<ul style="list-style-type: none"> • Formation of a dedicated ORR Relations Team • Escalator and Watchlist – working level engagement 	<ul style="list-style-type: none"> • Decision-making reporting improvements • Improved 'HELM' query management
	1.3 - Implement the Recommendations of the Rebel Group report into National Highways' Licence self-assurance	<ul style="list-style-type: none"> • Improved evidence system for Licence compliance • Internal Licence awareness training • Licence compliance accountability within the business 	<ul style="list-style-type: none"> • Quarterly reporting to ORR on self-assurance activities • Work with ORR to agree guidance on what it expects in relation to the reporting of a material breach

	Focus Area	Activities	
Theme 2 - Training, awareness and communication	2.1 - Internal ORR awareness training	<ul style="list-style-type: none"> Improved PRC / ORR framework information on Intranet Internal face-to-face briefings by PRC to Senior Leadership Teams, Town Halls and other business meetings 	<ul style="list-style-type: none"> Awareness training for key staff Update and improve information relating to Regulation and ORR's role in the Company Induction ORR Awareness Review for key staff
	2.2 - ORR Engagement	<ul style="list-style-type: none"> Regional Operations visits Major Project visits ORR Annual Assessment review 	<ul style="list-style-type: none"> ORR Regional Operations Centre (ROC) visits PRC/ORR relationship workshops ORR awareness roadshow
	2.3 - ORR Reporting Engagement & Support	<ul style="list-style-type: none"> Continued ORR Annual Safety Report activity 	<ul style="list-style-type: none"> ORR Annual Performance Report activity

	Focus Area	Activities	
Theme 3 - Preparedness for the next Road Period	3.1 - Setting the Framework for Success in the Next Road Investment Strategy	<ul style="list-style-type: none"> Improved meeting structure from April 2025 Support ORR's in updating its Holding to Account Policy 	<ul style="list-style-type: none"> Work with ORR on its Monitoring and Reporting Guidelines
	3.2 – Performance Framework Specification Improvements	<ul style="list-style-type: none"> Review proposals in the April 2024 draft Strategic Business Plan (dSBP) on Pavement KPI Capital Specification (Asset Management) improvements 	<ul style="list-style-type: none"> Designated Funds (value for money (VfM), decision-making and KPI benefits) Enhancement commitments – work with ORR the existing framework and provision of correct and proportionate visibility to ORR

1.1 - Improve the Provision of Information and Data to ORR

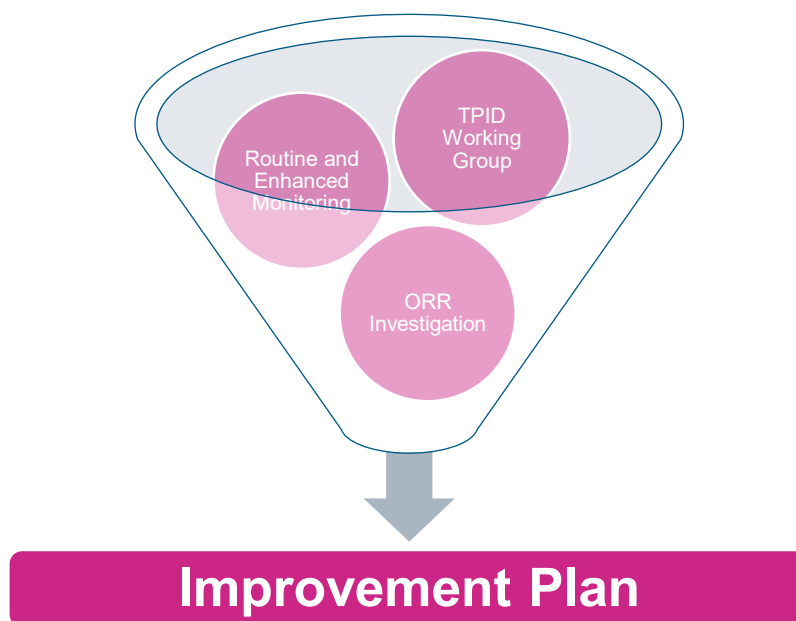
We are committed to make changes to both the 'what' and the 'how' we share information and data with ORR. The improvements set out in this chapter will focus on the quality, quantity and timeliness of the provision of information and data to ORR.

We understand the importance of the provision of appropriate and timely data and information to ORR. This is crucial to enable ORR to use this to help us drive improvements in delivery and performance from National Highways in the interests of road users and taxpayers.

Significant improvements have been made in recent months, both through the Investigation and through the joint Transparency and Provision of Information and Data (TPID) Working Group established between ORR and National Highways in November 2022 and ran until September 2023.

Examples of these improvements include the provision of information relating to various Escalator and Watchlist items, improvements to the format of information and data shared and engagement relating to topical media issues and Smart Motorway technology.

The activities set out in this plan are aimed at correcting the deficiencies identified through the Investigation to make a demonstrable step change in both the 'what' we provide to ORR and the 'how' we share this information and data.



1.1 - Improve Provision of Data and Information to ORR

One of the key themes of our Improvement Plan is to improve the provision of data and information to ORR. This will include a focus both on what we provide to ORR, to enable it to manage its statutory functions, but also how this information is provided.

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
National Incident Liaison Officer and media alerts (New)	<ul style="list-style-type: none"> The provision of National Incident Liaison Officer (NILO) Planned and Unplanned Outage Notifications to ORR, in the same way these are shared with the Department for Transport (DfT). Where appropriate, the provision of press/media alerts to ORR, where there is (or is likely to be) significant media interest. 	July '24	Completed	To provide ORR with information on operational activities so they are briefed ahead of any media interest.
Improve format and processes for responding to ORR information requests (New)	<ul style="list-style-type: none"> Create and use the consistent 'look and feel' to responses for information requests. Use of template, shared documents for National Highways Teams when responding to ORR information requests. Work with ORR to develop 'best practice' when responding to requests for information (RFIs) focussing on the quality, quantity and timeliness of information provision. 	July to Oct '24	In progress	<p>To provide a simple, effective and consistent provision of responses to RFIs from ORR.</p> <p>Enabling the prompt, accurate and easy to understand transfer of data between the two organisations.</p> <p>This will also enable better 'joined up' responses internally with National Highways when replying to ORR.</p>

Develop and agree Data Sharing Protocol for RIS3 (New)	<ul style="list-style-type: none"> • Work with ORR to agree the baseline position of the data and information provided on a cyclical basis for the remainder of RIS2. • Using this, agree with ORR the provision of data from April 2025, supporting ORR's development of its Monitoring Reporting Guidelines. 	Aug to Dec '24	In progress	To ensure we have an agreed scope for the provision of cyclical data and information to ORR to meet its statutory requirements.
Quarterly review of data provision feedback (New)	<ul style="list-style-type: none"> • As the improvements set out in this Plan are delivered, ensure that we are discussing and reviewing these with ORR, to ensure that the activities are meeting ORR's needs, and the processes are working. 	Oct '24 Jan '25 Apr '25 Jul '25	Planned	As with all plans, needs will change over time, and we want to ensure that our activities are meeting ORR's needs as we progress with the improvements.
Develop guidelines for good provision for data for ORR (New)	<ul style="list-style-type: none"> • Working with ORR and the National Highways business, the ORR Relations Team will develop guidelines and templates to ensure the 'good' provision of data and information to ORR. • These will also be socialised as part of the activities in internal ORR awareness training. 	Sep – Nov '25	Planned	The provision of data and information to ORR is clear and consistent across all themes/areas and reduces the need for ORR to ask follow up questions or submit further RFIs.
Improvements to cyclical meeting action completion and query management (Extension)	<ul style="list-style-type: none"> • Further to improvements suggested by ORR, continue to develop, implement and embed an Actions/Questions Log for all cyclical meetings. <ul style="list-style-type: none"> ○ These logs will be hosted on the ORR Portal to enable both organisations to update and review. 	Jul – Dec '25	In progress	Both organisations have a clear, easy to review and update 'Log' for the management of cyclical meeting actions and queries.

In detail

- **National Incident Liaison Officer (NILO) and media alerts (New)**
 - Significantly improve the provision of data and information for ORR in relation to Operational Technology outages and media sensitive issues on the network, which will include:
 - The provision of National Incident Liaison Officer (NILO) Planned and Unplanned Outage Notifications with ORR, in the same way these are shared with the DfT. These notifications are designed to enable the ORR Highways Team to:
 - Brief ORR seniors accordingly on planned and unplanned outages.
 - Provide assurance to ORR seniors on our operational response to planned and unplanned outages.
 - Support ORR in managing reputational risk and responding to media enquiries.
 - Where appropriate, the provision of press alerts to ORR, where there is (or is likely to be) significant media interest.
 - The ORR Relations Team will share, where appropriate, relevant media updates and National Highways 'lines to take' received in HELM on topics of interest for ORR. Recent examples of this are press releases relating to Operation Brock and position on exiting emergency areas on smart motorways.
- **Improve format and processes for information requests (New)**
 - Continue with improvements to create and use the consistent 'look and feel' in responses to information requests.
 - We have found through the Investigation and through improvements brought in with the introduction of PRC's ORR Secretariate function in late 2023, that the use of standardised templates ensures clarity, accuracy and quality of the information provided to ORR.
- **Work with ORR to develop mutually agreeable 'best practice' when responding to requests for information (RFIs).**
 - As set out in the Investigation Evidence Report, ORR would like to see PRC and the ORR Relations Team *'pivot from being largely a mediator of information, to becoming a facilitator of discussions and evidence gathering between ORR and the business as it did during the investigation.'*
 - We want to work with ORR to fully understand what this entails and how we can develop our functions and people to achieve this.

- **Develop and agree Data Sharing Protocol from April 2025 (New)**
 - Work with ORR to agree the baseline position of the data and information provided on a cyclical basis for RIS2.
 - Using this, agree with ORR the provision of data from April 2025, supporting ORR's development of its Monitoring Reporting Guidelines.
 - An initial meeting to begin this piece of work, was held on 12 August.
- **Quarterly review of data provision feedback (New)**
 - As the improvements set out in this Plan are embedded, we will review these with ORR, to ensure that they are meeting its needs, and the processes are working.
 - We will add a specific question to our quarterly External Stakeholder Survey with ORR to ask for anonymous feedback from the ORR Highways Team on how they feel our improvements are being embedded from December 2024.
- **Develop guidelines for 'good' provision for data for ORR (New)**
 - Working with ORR and the National Highways business, the ORR Relations Team will develop guidelines and templates to ensure the 'good' provision of data and information to ORR.
 - We want to work with ORR to move away from the transactional exchange of questions and responses, that has been unsatisfactory in the past. We will move to a more strategic process of us understanding from the outset, what it is ORR want to understand, and then for our subject matter experts to collate and provide the evidence to ensure this happens.
 - This is the process that was allowed to develop during the Investigation and enabled us to provide a broader suite of information to demonstrate our processes, performance and delivery.
 - The ORR Relations Team will ensure, during routine and enhanced monitoring, that the National Highways business is using this new state of mind in its interactions, thinking more about the wider understanding ORR is seeking, and also considering how their responses would be received, interpreted and understood by ORR colleagues.
- **Improvements to cyclical meeting action and query management (Extension)**
 - Further to improvements suggested by ORR, continue to develop, implement and embed an Actions/Questions Log for all cyclical meetings.
 - These logs will be hosted on the ORR Portal to enable both organisations to update and review them.
 - We have already implemented this for the quarterly Operations, Maintenance and Renewals (OMR) meeting in July 2024 and will now work to extend this to all other cyclical meetings.

Improve Provision of Data and Information to ORR

Timeline

	2024					2025						
Activities	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
National Incident Liaison Officer (NILO) and media alerts (New)		Completed										
Improve format and processes for information requests (New)												
Develop and agree Data Sharing Protocol from April 2025 (New)												
Quarterly review of data provision feedback (New)												
Develop guidelines for good provision for data for ORR (New)												
Improve cyclical meeting action and query management (Extension)												

1.2 - Business as Usual Improvements

We want to ensure we are getting the basics right. The introduction of a dedicated ORR Relations Team will help to do this, and we want to ensure that we continue to work with ORR to make sure we are meeting its needs.

Through the Investigation, it became clear that that the role PRC plays in the overall relationship between National Highways and ORR is key, and we need now to work on this to develop it further, moving from being a passive mediator to an active facilitator.

- We've formed a dedicated ORR Relations Team, which encompasses the improvements already made by the ORR Secretariate Function.
- This team will act as subject matter experts and inform decisions around any training content, along with providing support to the National Highways business when they are required to interact with ORR, 'translating' regulatory asks from ORR, into understandable tasks for our business colleagues.

In its Case to Answer letter, ORR highlighted concerns with a's decision-making process and the documentation this entails. In our response, we recognised the transparency and visibility for ORR behind some of our decisions could be improved.

- PRC is now working with the Chief Executive's Office, Legal and Corporate Assurance to improve the information provision on decision-making.
- This framework will ensure that there is clearer information on the decisions made by National Highways in relation to its commitments in the RIS and how it is balancing competing needs.



1.2 - Business as Usual Improvements

The way we interact with ORR on a day-to-day basis, establishes the basis of all our other interactions and improvements. Significant improvements had already been put in place prior to the Investigation as seen in recent responses to Escalator and Watchlist items.

Indeed the 'constructive' way in which National Highways' Performance and Regulatory Compliance (PRC) Division worked during the Investigation was suggested as a model going forwards in ORR's Investigation Evidence Report.

ORR would like to see PRC pivot from being largely a mediator of information, to becoming a facilitator of discussions and evidence gathering between ORR and the business, as it did during the investigation. Many of the activities in this section are a direct response to this ask.

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
Formation of a dedicated ORR Relations Team (New)	The ORR Relations Team will lead on all interactions between National Highways and ORR - 'translating regulatory asks from ORR, into understandable tasks for our business colleagues and acting as a trusted advisor for ORR and the National Highways business.	Aug '24	Complete	The ORR Relations Team will act as a critical friend to both ORR and the National Highways business, ensuring that the transfer of data and information, and the relationship continues to mature and improve.
Decision-making reporting improvements (Extension)	<p>PRC is now working with the Chief Executive's Office, Legal and Corporate Assurance to improve the information retention and provision on decision making.</p> <p>This will ensure that there is clearer information on the decisions made by National Highways, in relation to its commitments in the RIS and how it is balancing competing needs.</p>	Aug – Dec '24	Planned	National Highways will have a framework to define/direct how it retains an audit trail for decision making consistently across the organisation and when requested (for example by ORR) we can provide an equivalent, consistent and transparent evidence set on decision making, the delivery of commitments and how we balance competing needs.

Escalator and Watchlist (E&WL) – working level engagement (Extension)	<p>In August, we held a senior level ‘resolution’ meeting with ORR, where we discussed the specific actions that we can take to address ORR’s concerns with some of the ‘long-standing’ E&WL items.</p> <p>The aim of this meeting was to consider whether these actions will be sufficient to move these items off the E&WL.</p> <p>We will continue to work closely with ORR and the National Highways business to ensure that E&WL items are managed effectively and efficiently and that National Highways colleagues understand what it means for them when there is an E&WL Item in their areas.</p>	<p>Aug ‘24 (ongoing)</p>	<p>In Progress</p>	<p>E&WL items are managed in an effective and efficient manner with the appropriate levels of engagement from National Highways colleagues and senior leaders.</p> <p>E&WL items, where they become stuck, are addressed at a senior level to allow for resolution.</p>
Improved ‘HELM’ query management (Extension)	<p>Continue to make improvements to the way in which queries are managed through the HELM mailbox.</p> <p>Improvements to include the acknowledgement of queries, and the provision of a named person from the ORR Relations Team who will act as the liaison on the query and follow up as necessary.</p> <p>Standing offer to repeat and reprise HELM training for ORR staff, explaining how the ORR Relations Team manage HELM on a day-to-day basis and why this is important for ORR colleagues.</p>	<p>Sep – Dec ’24</p>	<p>Planned</p>	<p>All ad hoc queries received by the HELM mailbox are dealt with in an effective and efficient manner and ORR is kept update and timely responses are received.</p> <p>Ensuring all ORR Highways staff have an understanding of how HELM is managed and how best to interact with it.</p>

In Detail

- **Formation of a dedicated ORR Regulation Team (New)**
 - The ORR Relations Team will lead on all interactions between National Highways and ORR - 'translating regulatory asks from ORR, in to understandable tasks for our business colleagues and acting as a trusted advisor for ORR and the National Highways business.
 - This team will be the initial focal point for all ORR interactions with National Highways and will work with ORR Colleagues to build a shared agenda as the regulatory relationship matures.
- **Decision Making reporting improvements (Extension)**
 - PRC is now working with the Chief Executive's Office, Legal and Corporate Assurance to improve the information retention and provision on decision making.
 - The process will ensure decisions are recorded appropriately, including information on what decisions were made and why, the evidence upon which these decisions were made, and the implications that were considered and or accepted in the decision-making process.
 - It will help give more detail on how competing needs are being balanced in the delivery of our commitments.
 - The 'test' for these improvements will be that should the suite of information recorded be picked back up in 2+ years' time, there is sufficient information there to follow what decision was made and what underpinned the decision.
 - We will keep ORR updated on the progression of this work, as we look to bring in improvements to our existing decision-making process and framework.
- **Escalator and Watchlist (E&WL) – working level engagement (Extension)**
 - In August, we held a senior level 'resolution' meeting with ORR where we discussed the specific actions that we can take to address ORR's concerns with some of the 'long-standing' E&WL items. The aim of this meeting was to consider whether these actions will be sufficient to move these items off the E&WL.
 - We will continue to work closely with ORR and the business to ensure that E&WL items are managed effectively and efficiently and that National Highways colleagues understand what it means for them when there is an E&WL Item in their areas.
 - There will also be a Bi-Monthly discussion on 'sticky' E&WL items as a standing agenda item at the ORR/National Highways Bilateral.

- **Improved 'HELM' query management (Extension)**

- Continue to make improvements to the way in which queries are managed through the HELM mailbox. Improvements to include the acknowledgement of queries, and the provision of a named person from the ORR Relations Team who will act as the liaison on the query and follow up as necessary.
- We will add a specific question to our quarterly External Stakeholder Survey with ORR to ask for anonymous feedback from the ORR Highways Team on how they feel our improvements are being embedded, from December 2024.
- Standing offer to repeat and reprise HELM training for ORR staff, explaining how the ORR Relations Team manage HELM on a day-to-day basis and why this is important for ORR colleagues.
- This training will cover topic such as:
 - HELM query management from a National Highways perspective.
 - HELM calendar and diary management.

Business as Usual Improvements Timeline

Activities	2024					2025						
	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Formation of a dedicated ORR Regulation Team (New)												
E&WL – working level engagement (Extension)												
Improved ‘HELM’ query management (Extension)												
Decision Making reporting improvements (Extension)												

The improvements set out in this chapter will be implemented through Q3 and into Q4 2024/25 and ORR will begin to see notable, tangible improvements to its day-to-day interactions with National Highways, such as less rework, and better-quality outputs.

We will use the External Stakeholder Survey, cyclical meetings and bilaterals to ensure that these improvements are having the desired effect, and, if needed make further improvements as they are identified.

1.3 - Implement the Recommendations of the Rebel Group report into National Highways' Licence Self Assurance

We welcomed the findings of the ORR commissioned Rebel Report into our Licence self-assurance and will to work with ORR to deliver the changes and improvements suggested.

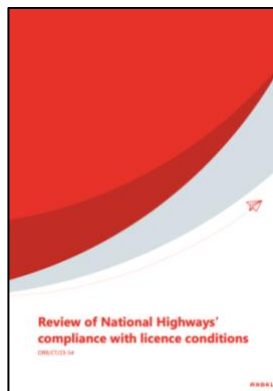
In early 2024, we worked closely with Rebel Group and ORR on our existing self-assurance processes for Licence compliance.

The report produced following this work set out a list of recommendations to improve these processes and to enable National Highways to better demonstrate that we are compliant with our Licence and that we have processes in place to demonstrate this to ORR.

- Whilst some of the recommendations, including a collaborative review of the conditions to effectively define the requirements, will need to wait until a new revised Licence is agreed in 2025, there are several activities we can commence in the meantime.

The Rebel Group's report recommendations can be divided into three key themes.

- The processes National Highways adopts to review and assess compliance with the Licence.
- National Highways' internal awareness, ownership and accountability of the Licence and the obligations contained therein.
- The reporting and assurance provided to ORR on National Highways activities and how we demonstrate our compliance to ORR on a cyclical basis.



1.3 - Implement the Recommendations of the Rebel Group report into National Highways' Licence Self Assurance

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
Improved evidence system for Licence compliance (Extension)	We are working to move away from the Licence Self-Assurance spreadsheet that has been used since RIS1, on to a much more fit for purpose evidence system based in Microsoft Lists and Power BI.	Aug – Nov '24	In Progress	National Highways' Licence self-assurance activities and evidence will be contained in a fit for purpose and forward-looking system.
Internal Licence awareness training for key staff (New)	Internal training of key staff to raise awareness of the Licence and the obligations contained therein. This will be included in the wider training noted elsewhere in this Plan.	Sep – Dec '24	Planned	All relevant National Highways staff have an awareness of the Licence and obligations contained therein and how these apply to them in their day-to-day work.
Licence compliance accountability within the business (Extension)	Executive and Divisional Director level accountability for each Licence condition (where appropriate) agreed, and briefings and further training provided, as needed, for this.	Oct -Dec '24	Planned	Responsibility and accountability for Licence compliance and escalating issues is cascaded and owned throughout National Highways.
Quarterly updates to ORR on self-assurance activities (Extension)	Facilitated by the improved evidence system, National Highways will provide quarterly updates to ORR on its Licence self-assurance activities.	Nov 24 (ongoing)	Planned	ORR will receive detailed quarterly reporting on National Highways' Licence self-assurance activities.

Agree guidance with ORR on what it expects in relation to the reporting of Licence non-compliance (New)	Work with ORR to agree a process for the notification/reporting of Licence non-compliance.	Oct – Dec '24	Planned	An agreed process in place for National Highways to notify ORR of Licence non-compliance or an early warning of possible non-compliance.
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In Detail

- **Improved evidence system for Licence compliance (Extension)**
 - We are working to move away from the Licence self-assurance spreadsheet that has been used since RIS1, on to a much more fit for purpose evidence system based in Microsoft Lists and Power BI.
 - This new system will be more stable, easy to use and will provide a great deal more scope for the provision of dashboards and reporting to ORR.
 - We will work with the ORR Highways Team to agree the level/detail of the reporting to enable it to fulfil its statutory duties.
- **Internal Licence awareness training for key staff (New)**
 - Internal training to raise awareness of the Licence and the obligations contained therein. This will be included in the wider training noted elsewhere in this plan.
 - This Training will cover
 - What is the purpose of the Licence within the regulatory framework that National Highways operates in.
 - The areas the Licence covers and the obligations that apply.
 - The consequences of non-compliance with the Licence.
- **Licence compliance accountability within the business (Extension)**
 - Executive and Divisional Director level accountability for each Licence condition (where appropriate) agreed, and briefings and further training provided as needed for this.
 - This will follow the model currently applied to the ownership of our RIS KPIs, PIs and Commitments and we will work with our Corporate Assurance Division to ensure that this also links with any internal audit activities.
- **Quarterly reporting to ORR on self-assurance activities (Extension)**
 - Facilitated by the improved evidence system, National Highways will provide quarterly reporting to ORR on its Licence self-assurance activities.
 - We will work with the ORR Highways Team to agree the level/detail of the reporting to enable it to fulfil its statutory duties.

- **Work with ORR to agree guidance on what it expects in relation to the reporting of a Licence breach (New)**
 - Work with ORR to agree a process for the notification/reporting of Licence non-compliance or an early warning of possible non-compliance.
 - We would look to replicate the processes we have in place to notify ORR of risks to our RIS2 KPIs, PIs and Commitments as demonstrated to Rebel Group during its review.

Implement the Recommendations of the Rebel Group report into National Highways' Licence Self Assurance

Timeline

	2024					2025						
Activities	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Improve evidence system for Licence compliance (Extension)												
Internal Licence awareness training (New)												
Licence compliance accountability within the business (Extension)												
Quarterly Update to ORR on self-assurance activities (Extension)												
Work with ORR to agree guidance on what it expects in relation to the reporting of a material breach (New)												

2.1 - Internal ORR Awareness Training

This Improvement Plan is committed to raising the awareness of our Licence requirements, ORRs duties and why data provision is important.

To ensure company-wide embedment of our Improvement plan and the activities contained therein, we consider stakeholder engagement and communication as a critical factor for success.

To reach our internal stakeholders, our engagement approach will:

- Research and define our target audiences and develop appropriate and effective communication activities to meet audience needs.
- Use evaluation of our communication activities to inform continuous improvement.
- Ensure all communications and engagement activities are accessible, inclusive and delivered in partnership with the corporate Employee Communication and Engagement team.

We will maintain awareness through:

- Working with the corporate Employee Communications team to ensure ORR topics are communicated in a timely and targeted way, signposting to additional information and resources when necessary.
- Internal Briefings that will cover subjects including ORR's Escalator and Watchlist, the Investigation outcomes and this Improvement Plan.



Make it Known

Determine and communicate the case for change.



Make it Real

Translate the activities into things that resonate for stakeholders – how they will benefit and contribute.



Make it Happen

Enact the changes through delivery.



Make it Stick

Make sure the changes are sustainable, with benefits which are realised and communicated.

2.1 - Internal ORR Awareness Training

A key theme that was identified, both by ORR and National Highways through the course of the Investigation, was the need to raise the awareness of ORR and its role within the wider National Highways community. This Plan is committed to cultural change within National Highways, raising the internal awareness of who ORR is, how we should interact with it, and how this plan is bringing us back in to compliance with our Licence following the ORR Investigation.

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
Improved PRC/ORR Framework information on the National Highways Intranet (Extension)	<ul style="list-style-type: none"> Along with a dedicated ORR Relations Team page on the PRC Intranet site, we will work with the corporate Employee Communication and Engagement team to produce relevant material to communicate the ORR framework. 	Aug – Oct '24	Planned	To begin to raise awareness of ORR and the work of the ORR Relations Team within National Highways' business.
Internal briefings by PRC to Senior Leadership Teams, Town Halls and other business meetings (Extension)	<ul style="list-style-type: none"> Working from the existing programme of monthly briefings and with Employee Communication and Engagement team, identify opportunity to include regular briefings on ORR topics in established corporate communication channels such as Leadership Management Group meetings and town halls. These briefings will cover subjects including ORR's Escalator and Watchlist, the Investigation Outcomes and this Improvement Plan. 	From now and ongoing	Planned	A defined programme of ORR 'moments' integrated into the existing corporate communication and engagement plan for 2024 and 2025.

Awareness training for key staff (New)	<ul style="list-style-type: none"> Working with our Learning and Development Team, design, develop and deploy an awareness training package for key staff. This will focus on the key aspects of the Licence and the role of ORR and the importance of good information and data provision. 	Sep – Dec '25	Planned	Upskill staff on the fundamentals of Roads Reform and the context on data provision and evidence of decision making to ORR.
Update and improve information relating to Regulation and ORR's role in the Company Induction (Extension)	<ul style="list-style-type: none"> Working with our Human Resources and Onboarding Teams, review and improve the information relating to ORR, its role and the regulatory framework within the National Highways Induction training. 	Sep – Dec '25	Planned	<p>This will ensure that all National Highways new starters are provided with an introduction to ORR and its role.</p> <p>It will also ensure that those going through the induction will know where to find out further information if they want to.</p>
ORR Awareness Reviews for Key Staff	<ul style="list-style-type: none"> In order to gain a baseline of ORR Awareness within National Highways, we will work with the Employee Communication & Engagement Team to define appropriate mechanisms to gauge level of awareness on ORR role on an ongoing basis for key staff. 	Dec 24 - Mar 25	Planned	This will provide us with the baseline to gauge awareness of ORR and its role within National Highways and will provide us with an ability to measure the effectiveness of our communication and engagement efforts. It will also help inform our communication and engagement activities.

In detail

- **Improved PRC / ORR Framework information on National Highways Intranet (Extension)**
 - Along with the creation of an ORR Relations Team Intranet 'landing page', we will work with the corporate Employee Communications and Engagement Team to produce relevant material to communicate the ORR Framework and the communication to key staff.
 - This is an 'early quick win' to begin to raise the profile of ORR framework within National Highways' business, especially at a time when there is significant interest, due to the Investigation.
 - This work will build on the Regulatory Notices already circulated, via email, on a monthly basis on ORR's Escalator and Watchlist Updates (c. 250 recipients) and the ad hoc email updates on topics such as ORR's consultation on its Holding to Account Policy and publication of its Annual Assessment.
- **Internal face-to-face briefings by PRC to Senior Leadership Teams, Town Halls and other business meetings (Extension)**
 - Working from the existing programme of monthly briefings and with Employee Communication and Engagement team, identify opportunity to include regular briefings on ORR topics in established corporate communication channels such as Leadership Management Group meetings and town halls.
 - These briefings will cover subjects including ORR's Escalator and Watchlist, the Investigation Outcomes and this Improvement Plan.
 - This is an opportune time to widen the reach of these briefings, provided by the ORR Relations Team, due to the heightened interest following the publication of the ORR Investigation outcomes and the development and delivery of this Improvement Plan.
- **Awareness training for key staff (New)**
 - Working with our Learning and Development Team, design, develop and deploy an awareness training package.
 - This will cover topics such as the requirements in our Licence, ORR's role and the regulatory framework in which National Highways operates.

- **Update and improve information relating to Regulation and ORR's role in the National Highways induction (Extension)**
 - Working with our Human Resources and Onboarding Teams, review and improve the information relating to ORR, its role and the regulatory framework within the National Highways induction training.
 - All new National Highways staff, including all our Early Talent attend a 1–2 day induction at the start of the employment with us. Therefore it is vital to ensure that information relating to ORR's role, its remit and how National Highways operates in the broader regulatory framework is correct and engaging.
 - Currently, there is a small amount of this covered in the induction, but with the Investigation, and this Improvement Plan, this is an opportune time to revisit this and ensure it is up to date and fit for purpose.
- **ORR Awareness Reviews for Key Staff (new)**
 - In order to gain a baseline of ORR awareness within National Highways, we will work with our corporate communication and engagement SMEs to define an approach to helping us gauge and monitor awareness of ORR within the business for key staff.
 - We will use this approach to measure the impact of some of the activities in this plan; inform continuous improvement of communication and engagement activities and provide recommendations for strategic interventions where appropriate.
 - It should be noted that many activities will also be evaluated as they are delivered, for example, engagement with intranet content, which will provide useful insights on how we can be more efficient and effective.

2.1 - Internal ORR Awareness Training Timeline

Activities	2024					2025						
	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Improved PRC / ORR Framework information on the National Highways Intranet (Extension)												
Internal face-to-face briefings by PRC to Senior Leadership Teams, Town Halls and other business meetings (Extension)												
Awareness training for key staff (New)												
Update and improve information relating to Regulation and ORR's role in the Company Induction (Extension)												
ORR Awareness Reviews for Key Staff (New)												

2.2 - ORR Engagement

We want to develop a more mature relationship with ORR, not just in the data and information space, but also to work to become seen as a trusted partner for ORR.

We have already done a great deal in the past two years to develop and improve the relationship with ORR's Highways Team. This has included:

- Four all-day Relationship Workshops between the ORR Highways Teams and relevant members of PRC.
- Key Stakeholder Workshops before and after ORR's 2022-23 Annual Assessment and a series of Operations and Major Projects visits.
- A series of ORR Roadshows to facilitate engagement for ORR with a much wider audience within the National Highways business, with over 350 staff attending these throughout the year.

We now want to work on this strong foundation, especially as there have been a number of new starters/changes in roles in both PRC and ORR's Highways Team, we'll do this by:

- Hosting a series of both Operations and Major Projects visits and visits to our Regional Operations Centres for key ORR staff and members of the Highways Committee.
- Host a series of Key Stakeholder Workshops in the autumn focussing on the key messages from ORR's 2023-24 Annual Assessment.
- Rekindle the ORR Roadshows and PRC/ORR Relationship Workshops, now the Investigation has concluded.



2.2 - ORR Engagement

Engagement is key to developing a more mature regulatory relationship with ORR, and, as part of the Improvement Plan, we want to build on the good foundations that have been put in place over the past few years. This is to enable ORR's Highways Team, Highways and Regulatory Committees and its Board to see (and meet with) the breadth of National Highways staff and meet our people 'on the ground'.

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
Regional Operations visits (Extension)	A repeat series of regional engagement to demonstrate how National Highways is developing and embedding best practice asset management and to build regional relationships and for ORR to gather intelligence.	Oct '24 - Mar '25	Planned	To continue to build regional relationships, for ORR to gather intelligence and to meet with our Regional Operations teams.
Major Project visits (Extension)	A continuation of last year's visits to Major Project sites and programme teams to build relationships, to aid ORR's understanding of work in this area and to address ORR's concerns with missed enhancement commitments.	Oct '24 - Mar '25	Planned	To continue to build regional relationships and gather intelligence, and to meet with our Major Projects teams across the country.
ORR Annual Assessment review (Extension)	A webinar/workshop with key stakeholders in the autumn focusing on the key messages from ORR's 2023-24 Annual Assessment, in a similar way to those held for 2022/23 submission.	Oct – Dec '24	Not Started	To ensure that there common understanding of ORR's key messages and to enable ORR to be clear on what it is asking for and to determine and agreed the timeline for the provision of this.

ORR Regional Operations Centre (ROC) visits (Extension)	Facilitated visits to our ROCs to demonstrate our operational activities for ORR Highways' Team staff, and our Smart Motorway technology in operation for ORR's Highways Committee.	Sep – Oct '24	Planned	To enable ORR staff and Highways Committee members to experience the activities of the ROC and engage with ROC staff.
PRC/ORR relationship workshops (Extension)	Re-invigorate the PRC/ORR Relationship Workshops, now the Investigation is concluded and there have been new starters/changes in roles in both PRC and ORR's Highways Team.	Sep '24 (ongoing)	In Progress	To continue to improve the relationships at working level between ORR and PRC.
ORR awareness roadshows (Extension)	Work with ORR to restart a series of Roadshows, now the Investigation is concluded and whilst there is a heightened interest following its publication and the development and delivery of this Improvement Plan within National Highways. Also consider ways to improve this with the use of a recorded webinar style that could then be recorded and reused.	Nov '24	Not Started	Improved engagement between ORR's Highways Team and the wider National Highways business.

In Detail

- **Regional Operations visits (Extension)**

- A repeat series of regional engagement to demonstrate how National Highways is developing and embedding best practice asset management and to build regional relationships and allow ORR to gather intelligence.
- These visits have already been booked in diaries for the following dates:
 - Southeast Region – 3 October 2024
 - East Region – 4 October 2024
 - Southwest Region – 9 October 2024
 - Northwest Region – 14 November 2024
 - Yorkshire, Northeast Region – 15 November 2024
 - Midland Region – 20 February 2025

- **Major Project visits (Extension)**

- A continuation of last year's visits to Major Project sites and with programme teams to build relationships, to aid ORR's understanding of work in this area and to address ORR's concerns with missed enhancement commitments.
- These visits/meetings are still being planned, but will include visits to the following Major Projects sites:
 - A1 Birtley to Coalhouse – date TBC
 - A428 Black Cat - date TBC
 - M2 Junction 5 - date TBC
 - A417 Air Ballon - date TBC
 - M3 Junction 9 - date TBC

- **ORR Annual Assessment review (Extension)**
 - A series of Key Stakeholder Workshops in the autumn focussing on the key messages from ORR's 2023-34 Annual Assessment, in a similar way to those held last year.
 - The purpose of these meeting will be to gain a common understanding of ORR's key messages, to enable ORR to be clear on what it is asking for and to determine and agreed the timeline for the provision of this.
 - These will focus on the key messages from this year's Annual Assessment around deliverability of targets, commitments and the capital programme and uncertainty/financial pressures.
- **ORR Regional Operations Centre (ROC) visits (Extension)**
 - Facilitated visits to our ROCs to demonstrate our operational activities for ORR Highways' Team staff, and our Smart Motorway technology in operation for ORR's Highways Committee.
- **PRC/ORR relationship workshops (New)**
 - Re-invigorate the PRC/ORR Relationship Workshops, now the Investigation is concluded and there have been new starters/changes in roles in both PRC and ORR's Highways Team.
- **ORR awareness roadshows (Extension)**
 - Work with ORR to restart a series of Roadshows, now the Investigation is concluded and whilst there is a heightened interest following its publication and the development and delivery of this Improvement Plan within National Highways.

2.2 - ORR Engagement Timeline

	2024					2025						
Activities	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Regional Operations visits (Extension)												
Major Project visits (Extension)												
ORR Annual Assessment review (Extension)												
ORR Regional Operations Centre (ROC) visits (Extension)												
PRC/ORR relationship workshops (New)												
ORR awareness roadshows (Extension)												

2.3 - ORR Reporting Engagement & Support

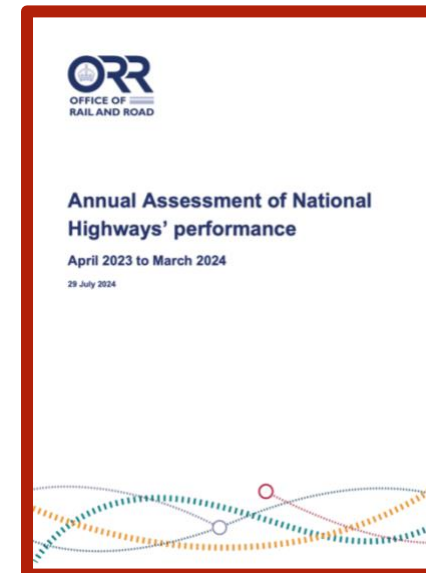
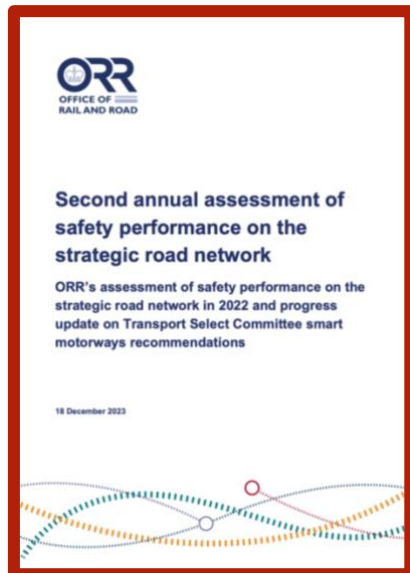
We want to support ORR in the delivery of its annual reporting for both its Annual Assessment of Safety Performance on the Strategic Road Network and the Annual Assessment of National Highways' Performance.

Each year we work closely with ORR to provide significant levels of data and information to enable it to draft and delivery its Annual Assessment on National Highways performance for the previous year.

- We will agree the scope of this annual provision of data and information as part of the work to agree the Monitoring Reporting Guidelines (as noted elsewhere in this Plan).
- We also want to ensure that we capture any lessons learnt from the process followed this year and a meeting with ORR is being planned.

Since 2023 we have also worked with ORR to provide information and data for its Annual Assessment of Safety Performance on the Strategic Road Network.

- This year we want to ensure that we provide ORR with all the relevant information and data, especially as the focus of this year's report expands to cover National Highways' work on operational technology and managing power outages on the network and also our activities in line with the Transport Select Committee (TSC) 6 recommendations.



2.3 - ORR Reporting Engagement & Support

We want to support ORR in the delivery of its annual reporting for both its Annual Assessment of Safety Performance on the Strategic Road Network and the Annual Assessment of National Highways Performance.

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
ORR Annual Performance Report Activity (Extension)	<p>We will agree the scope of this annual provision of data and information as part of the work to agree the Monitoring Reporting Guidelines (as noted above).</p> <p>We also want to ensure that we capture any lessons learnt from the process followed this year and a meeting with ORR is scheduled for 6 September 2024.</p>	Jan – July '25	In Progress	ORR has the support, data, information and input from National Highways to enable it to write its Annual Performance Report and lessons are learnt from previous years.
ORR Annual Safety Report activity (Extension)	We will work with ORR to ensure that we provide it with all the relevant information and data, especially as the focus of this year's report expands to cover National Highways' work on operational technology and managing power outages on the network and also our activities in line with the TSC6 recommendations.	Aug 24 - Feb 25	In Progress	ORR has the support, data, information and input from National Highways to enable it to write its Annual Safety Report and lessons are learnt from previous years.

In Detail

- **ORR Annual Performance Report Activity (Extension)**
 - We will agree the scope of this annual provision of data and information as part of the work to agree the Monitoring Reporting Guidelines (as noted elsewhere in this Plan).
 - We also want to ensure that we capture any lessons learnt from the process followed this year and a meeting with ORR is being planned.
- **ORR Annual Safety Report activity (Extension)**
 - This year we want to ensure that we provide ORR with all the relevant information and data, especially as the focus of this year's report expands to cover our work on operational technology and managing power outages on the network and also our activities in line with the TSC6 recommendations.
 - This will include:
 - Facilitating visits for members of the Highways Committee to one of our Regional Operations Centres, to allow them to see our various operational technologies in action.
 - Our Operational Controls Director attending the September Highways Committee meeting to present on All Lane Running Smart Motorways technology outages.

ORR Reporting Engagement & Support Timeline

	2024					2025						
Activities	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
ORR Annual Performance Report activity (Extension)												
ORR Annual Safety Report activity (Extension)												

3.1 - Setting the Framework for Success for the Next RIS

We want to set ourselves up for success in the next road period, with a monitoring framework that is robust, appropriate and provides an environment for efficient and effect data and information exchange and engagement.

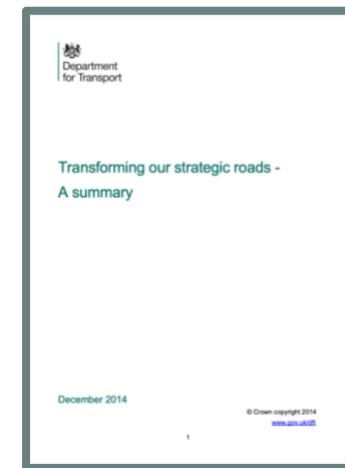
Currently, PRC facilitates more than 50 cyclical meetings, along with several monthly and ad hoc meetings throughout the year.

For the next Road Period, we want to ensure that our quarterly and cyclical engagement deliver the right information, demonstrate how we are meeting our outcomes and that it functions in an efficient manner for all.

We will do this by Reviewing and agreeing a new reporting structure for from April 2025 that focuses meetings by outcome areas, combining similar themes that are currently covered in other disparate areas.

We will also ensure that all ORR meetings and engagement have the same 'look and feel' with secretariat rigour applied to meeting papers and slides.

We will support and provide feedback to ORR as it reviews and develops its Holding to Account Policy and Monitoring Reporting Guidelines.



3.1 - Setting the Framework for Success in RIS3

We want to set ourselves up for success in the next road period, with a monitoring framework that is robust, appropriate and provides an environment for efficient and effect data and information exchange and engagement.

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
Improved meeting structure from April 2025 (New)	<p>Review and agree a new reporting structure that focuses meetings by outcome areas, combining similar themes that are currently covered in other disparate areas.</p> <p>We will also ensure that all ORR meetings and engagement have the same 'look and feel' with secretariat 'rigour' applied to meeting papers and slides.</p>	Sep – Dec '24	In Progress	To have a cyclical meeting structure for the next Road Period that allows for productive discussion, enhanced evidence provision and improved engagement, in a way that is efficient and effective for all.
Support ORR's updating of its Holding to Account Policy (New)	<p>Work with ORR as it updates its Holding to Account Policy, responding to ORR's consultation published on 1 July 2024.</p> <p>Provide support and input as required by ORR in considering responses to this consultation and the drafting of the final Policy.</p>	Aug – Dec '24	In Progress	<p>Assist ORR to develop and implement a Holding to Account Policy for the next Road Period that clearly sets out its role and powers clearly.</p> <p>Once the policy is updated PRC will ensure this is socialised and understood widely across the relevant National Highways teams.</p>

<p>Work with ORR on its Monitoring Reporting Guidelines for the next RIS (Extension)</p>	<p>Linked to the improvements noted elsewhere in this plan, we will work with ORR to agree the baseline position of the data and information provided on a cyclical basis for RIS2.</p> <p>Using this, we will agree with ORR the provision of data from April 2025, supporting ORR's development of its Monitoring Reporting Guidelines.</p>	<p>Aug – Dec '24</p>	<p>In Progress</p>	<p>National Highways is clear on the expectations for the quality, quantity and timeliness of the requirements that are set out in ORR's Monitoring and Reporting Guidelines for the next Road Period. .</p>
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In Detail

- **Improved meeting structure from April 2025 (New)**
 - Review and agree a new reporting structure from April 2025 that focuses meetings by outcome areas, combining similar themes that are currently covered in other disparate areas.
 - We will also ensure that all ORR meetings and engagement have the same 'look and feel' with secretariat 'rigour' applied to meeting papers and slides.
- **Support ORR's updating of the Holding to Account Policy (New)**
 - Work with ORR as it updates its Holding to Account Policy, responding to ORR's consultation published on 1 July 2024.
 - Provide support and input as required by ORR, in considering responses to this consultation and the drafting of the final Policy.
 - We will also use this review to publicise internally how ORR holds National Highways to account and what is included in the policy.
- **Work with ORR on the Monitoring and Reporting Guidelines (Extension)**
 - Linked to the improvements noted elsewhere in this plan, we will work with ORR to agree the baseline position of the data and information provided on a cyclical basis for RIS2.
 - Using this, we will work with ORR on the provision of data, supporting ORR's development of its Monitoring Reporting Guidelines.
 - An initial meeting to begin this piece of work, was held on 12 August.

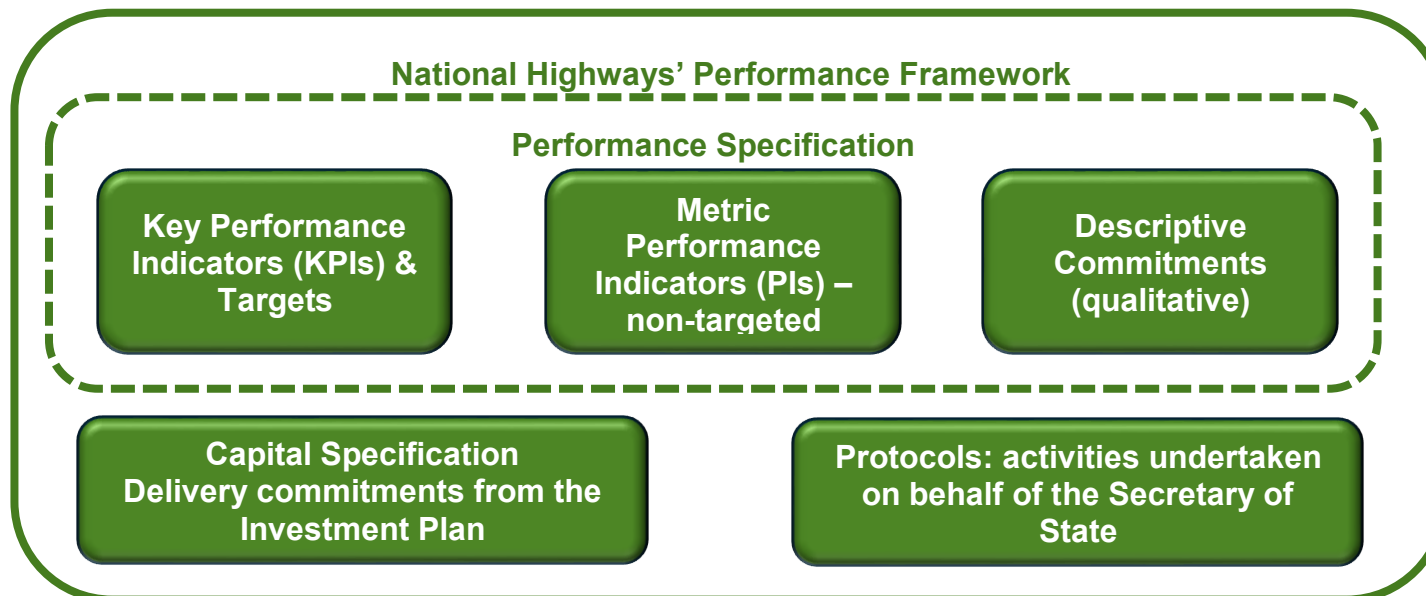
3.1 - Setting the Framework for Success in RIS3 Timeline

	2024					2025						
Activities	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Improved meeting structure from April 2025 (New)												
Support ORR's updating of its Holding to Account Policy (New)												
Work with ORR on its Monitoring Reporting Guidelines for RIS3 (Extension)												

3.2 – Performance Framework Improvements

We want to develop our Performance Framework to ensure it sets the foundation for ORR's monitoring and our internal business planning, ensuring we have one joined up approach that enables us to meet the required performance and commitments and demonstrate our delivery to government.

- The Performance Framework brings together all the requirements within a Road Period that National Highways commits to DfT to achieve in return for the Statement of Funds Available (SoFA).
 - It brings together DfT's Performance Specification (metrics, targets and descriptive commitments) with delivery commitments from the Investment Plan and sets out how these will be targeted, measured and monitored.
 - Overall, the Framework should be fair and balanced, transparently demonstrating and measuring performance, and managing risk.
- 'How' the performance framework is specified for RIS3 affects the data provision and decision making in that Road Period. Getting it right is important for compliance.
- **Note:** This chapter details the specific commitments made in our response to ORR's Investigation Case to Answer Letter that relate to the Performance Framework.
 - All the activities in this chapter, will be taken forward in conjunction with the existing Performance Framework Task and Finish Groups.



3.3 – Performance Framework Improvements

The table below details the specific activities in this theme, when we will be carrying them out and what the desired outcomes will be.

Activity	High-Level Description	When	Status	Desired Outcome
Review the proposals in the April 2024 draft Strategic Business Plan (dSBP) on Pavement KPI (Extension)	<p>In the RIS3 dSBP on April 2024, we set out an approach for targets for our Pavement KPI which we believe will overcome the technical challenge and deliver better long-term asset health.</p> <p>We also propose to set out specific concrete road reconstruction schemes as an output to improve visibility of delivery.</p> <p>We will work with ORR to embed these – or a form of these – into the Performance Framework to improve monitoring and data provision.</p>	Aug – Oct '24	In Progress	The Pavement KPI for the next Road Period will overcome the technical challenges and deliver better long-term asset health.
Capital Specification (Asset Management) Improvements (Extension)	<p>We have structured the draft Capital Specification to embed the 'strategy' element of asset management into the specific deliverables e.g. setting out specific structure schemes and outputs for structural investigations to understand risks, setting specific concrete road scheme outputs and a commitment to asset health/serviceability metrics.</p>	Aug – Oct '24	In Progress	The Asset Management Strategy is embedded in the Capital Specification and there is a clear line of sight for specific structures schemes and outputs.
Designated Funds (value for money (VfM) / decision-making and KPI benefits) (New)	<p>We will work with ORR to consider how the KPI benefits are made more visible in Designated Funds projects and to work with ORR on this as part of the Capital and Performance Specification.</p>	Aug – Oct '24	In Progress	The KPI impacts of Designated Funds projects are clearly set out from the on-set of the projects.

<p>Enhancement commitments – work with ORR on the existing framework and provision of correct and proportionate visibility to ORR. (Extension)</p>	<p>We will work with ORR to consider whether the existing framework for enhancement commitments are providing the correct and proportionate visibility of potential risks and whether the existing early warning mechanisms are providing the correct and proportionate visibility of potential risks.</p>	<p>Aug – Oct '24</p>	<p>In Progress</p>	<p>The Performance Framework for Enhancements allows the proportionate visibility of potential risks and that the early warning mechanisms are fit for purpose.</p>
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In Detail

- **Review the proposals in the April 2024 draft Strategic Business Plan (dSBP) on Pavement KPI (Extension)**
 - In the RIS3 dSBP of April 2024 we set out an approach for setting the target on this metric which we believe will overcome the technical challenge and deliver better long-term asset health. We also propose to set out specific concrete road reconstruction schemes as an output to improve visibility of delivery.
- **Capital Specification (Asset Management) Improvements (Extension)**
 - We have structured the draft Capital Specification to embed the 'strategy' element of asset management into the specific deliverables e.g. setting out specific structure schemes and outputs for structural investigations to understand risks, setting specific concrete road scheme outputs and a commitment to asset health/serviceability metrics.
- **Designated Funds (VfM/Decision Making and KPI benefits) (Extension)**
 - Working with ORR to consider how the KPI benefits are made more visible in Designated Funds projects and to work with ORR on this as part of the Capital and Performance Specification.
- **Enhancement commitments – work with ORR the existing framework and provision of correct/proportionate visibility to ORR (Extension)**
 - We will work with ORR to consider whether the existing framework for enhancement commitments are providing the correct and proportionate visibility of potential risks and whether the existing early warning mechanisms are providing the correct and proportionate visibility of potential risks.

Performance Framework Improvements Timeline

	2024					2025						
Activities	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul
Review proposals in the April 2024 draft Strategic Business Plan (dSBP) on Pavement KPI												
Capital Specification (Asset Management) Improvements												
Designated Funds (VfM/Decision Making and KPI benefits)												
Enhancement commitments – work with ORR the existing framework and provision of correct and proportionate visibility to ORR.												

Note: the dates may change considering the Strategic Review and a 1 Yr Interim settlement for 25/26 and DfT's plan for these processes.

National Highways' Improvement Plan following ORR's Investigation - Overall Timeline

Theme	Activities	2024					2025							
		Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	
Getting back into compliance & Improvements to Business as Usual	Improve the provision of data and information to ORR													
	National Incident Liaison Officer and media alerts*													
	Improve format and processes for information requests*													
	Develop and agree Data Sharing Protocol for RIS3*													
	Quarterly review of data provision feedback*													
	Develop guidelines for good provision for data for ORR*													
	Improve cyclical meeting action and query management													
	Business as Usual Improvements													
	Formation of a dedicated ORR Relations Team*													
	E&WL – working level engagement													
	Improved 'HELM' query management													
	Decision-making reporting improvements													
	Implement the recommendations of the Rebel Group report													
	Improve evidence system for Licence compliance													
	Internal Licence awareness training for key staff*													
Review licence compliance accountability within the business														
Quarterly Updates to ORR on self-assurance activities														
Agree guidance on what ORR expects in relation to the reporting of a material breach*														
Training, Awareness and Communication	Internal ORR Awareness Training													
	Improved PRC / ORR framework information on Intranet													
	Internal f2f briefings to Senior Leadership Teams and other business meetings													
	Awareness Training for key staff*													
	Improve information relating to regulation and ORR's role in the NH Induction													
	ORR Awareness reviews for key staff*													
	ORR Engagement													
	Regional Operations visits													
	Major Project visits													
	ORR Annual Assessment review													
	ORR Regional Operations Centre (ROC) visits													
	PRC/ORR relationship workshops*													
	ORR awareness roadshows													
	ORR Reporting Engagemnt and Support													
	ORR Annual Performance Report review													
ORR Annual Safety Report activity														
Preparedness for RIS3	Setting the Framework for Success in RIS3													
	Improved meeting structure for RIS3*													
	Support ORR's updating of its Holding to Account Policy*													
	Work with ORR on its Monitoring Reporting Guidelines for RIS3													
	RIS3 Specification Improvements (in dSBP and Investigation letter)													
	Review proposals in the draft Strategic Business Plan (dSBP) on Pavement KPI													
	Capital Specification (Asset Management) Improvements													
Designated Funds (VfM/Decision Making and KPI benefits) *														
Enhancement commitments improvement of existing provision of information														

*denotes new activity in direct response to the investigation. Other activities are an extension of current processes

Delivering the Plan



- PRC and the ORR Relations Team will be leading on delivering the activities under this plan with the support of several teams across National Highways as required.
- They will also be the point of contact for ORR in relation to the activities under this plan.

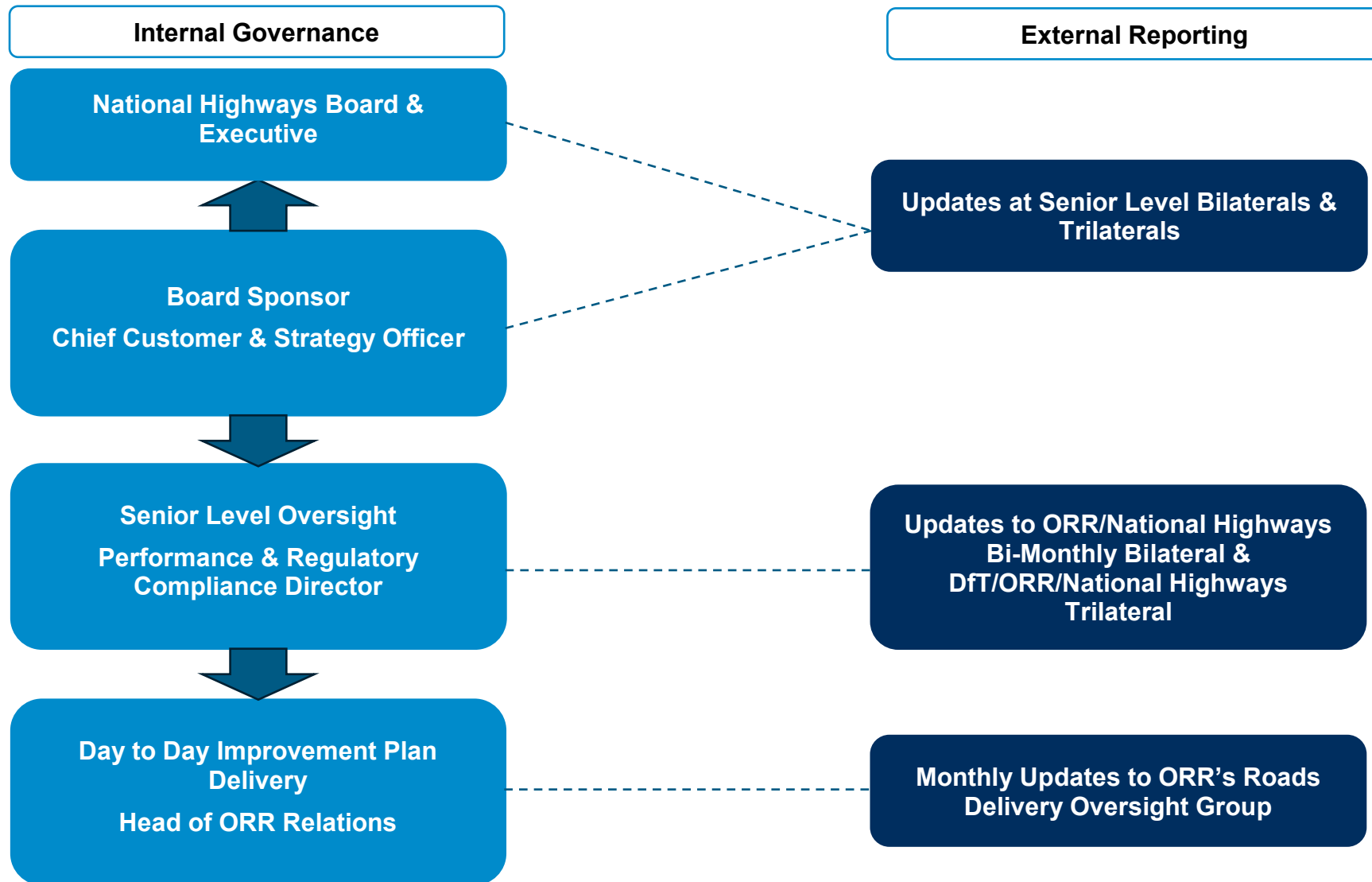


- We will provide a monthly update to ORR to cover all our activities set out in the Improvement Plan, along with any milestones achieved or at risk.
- This will take the form of a Dashboard and will be provided to ORR five working days ahead of its Road Delivery Oversight Group (RDOG) each month.
- We will also provide an update at the ORR/National Highways Working Level and Senior Level Bilaterals and the ORR/National Highways/DfT Trilaterals as we progress through the actions in this plan.



- National Highways' Board and Executive Committees will be kept updated through the Customer, Strategy and Communications (CSC) CEO's Board Report and by papers as and when appropriate through the duration of the activities under this Plan.
- We have included a regular progress review point with ORR in the plan. We will use this to update the plan as needed for any specific focus areas.

Organisational Chart



Governance and Assurance of the Plan



- Overall governance of this Improvement Plan has been delegated by National Highways' Executive Committee to our Chief Customer and Strategy Officer.
- Day to day oversight of the activities will be provided by Performance and Regulatory Compliance Divisional Director.
- Where necessary, we will call upon colleagues in our Corporate Assurance Division to provide assurance on the delivery of actions in the plan as required.