

Post ORR Investigation Improvement Plan Six Month Update

March 2025

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 regarding Condition 7.3 (e), which covers the provision of 'any other data or information' ORR may reasonably require to fulfil its statutory functions.

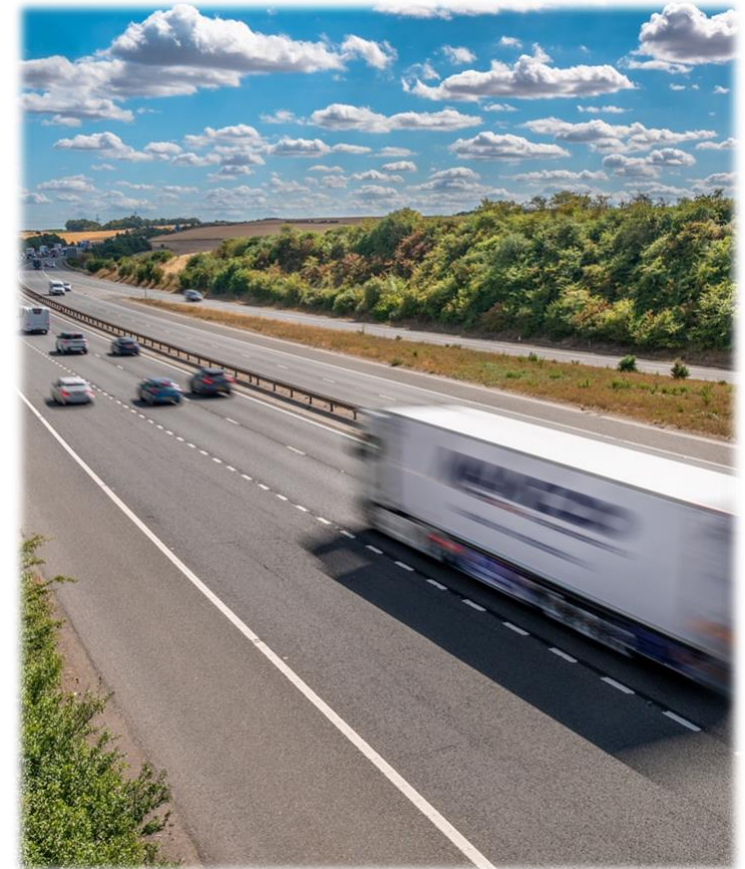
National Highways' ORR Relations Team, worked closely with ORR colleagues between June and September 2024 to develop, implement and deliver a formal, timebound Improvement Plan, with the purpose of bringing National Highways back into compliance with its Licence.

Overall, this plan was designed to

- 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.

The plan has now been in place for six months, and many of the activities initially identified have been delivered, with many more underway.

The purpose of this document is to provide an update on the Post Investigation Improvement Plan (PIIP) activities delivered, highlight where these activities have changed over time and provide context on other developments since the PIIP was implemented six months ago.



Overview of the Initial Plan

To address ORR's findings in the Investigation, we 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, was (and remains) to improve the quality, quantity and timeliness of the information and data provision by National Highways to ORR.



This document looks to provide ORR and the National Highways business with an update of the successes of the PIIP to date, what has already been achieved, and what we plan to deliver over the remaining six months of the plan.

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

Successes of the Post Investigation Improvement Plan to Date



Virtual ORR Roadshow presented to nearly 200 members of National Highways Staff



Hosted a pre-ORR Safety Report visit to the Northwest Regional Control Centre for ORR Non-Executive Directors



Internal ORR Awareness Training rolled out, so far delivered to over 60 people across multiple teams with more to come



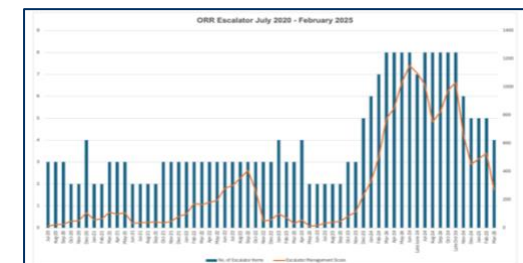
Major Projects Visit to the A417 Air Balloon Scheme



Company-wide Internal Communications to raise awareness of ORR



Operational Regional Visits – including seeing our new Yorkshire Northeast Regional Control Centre



Increased visibility of ORR related reporting at a senior level, shown here with the Escalator Management Score

Focus for the Next Six Months

The next six months will see the end of the second Road Period (RIS2), the start of the Interim Settlement Year and the planning for and setting of the third Road Period (RIS3).

- **Theme 1 - Information provision (1.1)**

National Highways is working closely with ORR to provide information on the actions we have taken on those RIS2 commitments that are off track or likely to be missed at the end of the Road Period. This includes explanations of our decision making and subsequent actions taken in relation to these commitments and where we have had to make trade-offs or where performance has been affected by factors outside our control. We have also discussed how we have and will use this insight to adjust our plans and learned lessons that will be taken forward into RIS3.

- **Theme 3 - The Interim Settlement Year meetings (3.1)**

Whilst the Interim Settlement Year represents a continuation of many elements of our Performance Framework, it does introduce new trial approaches in a few critical areas, namely Safety, Delay and Customer. This will require a different approach to the sharing of data and information with ORR against published action plans that will enable a clearer link between our activities and likely outcomes.

- **Theme 3 - Preparedness for RIS 3 (3.2)**

We are currently actively engaging with both ORR and DfT develop the RIS3 Capital and Performance Specifications and following the outcomes of the Government Spending Review in June 2025, we will be submitting our draft Strategic Business Plan to ORR for scrutiny via its Efficiency Review.

This is a significantly busy time for ORR, DfT and National Highways, and it is vital that the transformational improvements already seen in the first six months of this plan continue to meet the needs of ORR and demonstrate our commitment to mature in our behaviours and our relationship with ORR.



Updated 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 – Now Business as Usual Improve format and processes for ORR information requests - Now Business as Usual Develop and agree Data Sharing Protocol from April 2025 - Now Business as Usual 	<ul style="list-style-type: none"> Quarterly review of data provision feedback with ORR - Ongoing Develop guidelines on 'good' provision for data for ORR – Now embedded in the Internal Awareness Training Improvements to cyclical meeting action completion and query management - Now Business as Usual
	1.2 - Business as usual improvements	<ul style="list-style-type: none"> Formation of a dedicated ORR Relations Team – Completed Escalator and Watchlist – working level engagement - Now Business as Usual 	<ul style="list-style-type: none"> Decision-making reporting improvements - Ongoing Improved 'HELM' query management - Now Business as Usual
	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 - Now Business as Usual from April 2025 Internal Licence awareness training - Now embedded in the Internal Awareness Training Licence compliance accountability within the business - Now Business as Usual from April 2025 	<ul style="list-style-type: none"> Quarterly reporting to ORR on self-assurance activities - Now Business as Usual from April 2025 Work with ORR to agree guidance on what it expects in relation to the reporting of a material breach – Ongoing

	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 – Completed (with regular updates ongoing) Internal face-to-face briefings by PRC to Senior Leadership Teams, Town Halls and other business meetings - Now Business as Usual as part of wider Internal Communications Campaign Awareness training for key staff - Ongoing 	<ul style="list-style-type: none"> Update and improve information relating to Regulation and ORR's role in the Company Induction – Completed, with a standing offer of more bespoke inductions from the ORR Relations Teams for relevant staff ORR Awareness Review for key staff - Now Business as Usual as part of wider Internal Communications Campaign
	2.2 - ORR Engagement	<ul style="list-style-type: none"> Regional Operations visits – 24-25 Visits completed, programme in development for 25-26 Major Project visits - 24-25 Visits completed, programme in development for 25-26 ORR Annual Assessment review – in planning for July 2025 	<ul style="list-style-type: none"> ORR Regional Operations Centre (ROC) visits - – 24-25 Visits completed, programme in development for 25-26 PRC/ORR relationship workshops - Now Business as Usual from April 2025 ORR awareness roadshow - Now Business as Usual from April 2025
	2.3 - ORR Reporting Engagement & Support	<ul style="list-style-type: none"> Continued ORR Annual Safety Report activity - Now Business as Usual 	<ul style="list-style-type: none"> ORR Annual Performance Report activity - Now Business as Usual

Theme 3 - Preparedness for the Net Road Period

3.1 - Setting the Framework for Success in the Next Road Investment Strategy

- Improved meeting structure from April 2025 - **Now Business as Usual from April 2025**
- Support ORR's in updating its Holding to Account Policy - **Completed**

- Work with ORR on its Monitoring and Reporting Guidelines - **Ongoing**

3.2 – Performance Framework Specification Improvements

- Review proposals in the April 2024 draft Strategic Business Plan (dSBP) on Pavement KPI – **Ongoing**
- Capital Specification (Asset Management) improvements - **Ongoing**

- Designated Funds (value for money (VfM), decision-making and KPI benefits) – **Ongoing**
- Enhancement commitments – work with ORR the existing framework and provision of correct and proportionate visibility to ORR - **Ongoing**

Detailed Update on Improvement Plan Activities



Improve provision of data and information to ORR

In the original September Plan, the intention of these activities was to demonstrate that we were committed to make changes to both the 'what' and the 'how' we share information and data with ORR and to focus on the quality, quantity and timeliness of the provision of information and data to ORR.

In the last six months we have seen transformational improvements in this area which have resulted in the following

- ORR's Highways Team being on the 'front foot' when it comes to areas of significant media or senior level interest with the provision of the NILO alerts for outages, and press/media alerts and information on National Highways 'lines to take'.
- The 'flow' of requests for information and questions on our quarterly reporting is now consistent across the piece and managed much more actively to ensure improvements to the quality, quantity and timeliness in our provision of information to ORR.
- We have 'baselined' our reporting in RIS2, which has enabled us to have constructive discussions with ORR on how we can make improvements to this as we enter the Interim Settlement Year and in preparation for RIS3.
- Our Improvement Plan, and the Internal Awareness Training has significantly raised the internal understanding amongst all relevant National Highways staff of the importance of high quality, timely and comprehensive provision of information and data to ORR, and this was reflected on positively at the recent ORR Focus Group Session.

Summary of Specific Activities

Activity	High-Level Description	Desired Outcome	Status	Next Steps
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. 	To provide ORR with information on operational activities so they are briefed ahead of any media interest	Completed	This activity is now business as usual, and we have seen this aid the management of ORR queries and requests for information.

<p>Improve format and processes for responding to ORR information requests (New)</p>	<ul style="list-style-type: none"> • Create and use a consistent 'look and feel' to responses for information requests, with the use of shared documents for National Highways Teams when responding to ORR • Work with ORR to develop 'best practice' when responding to requests for information (RFIs) focussing on the quality, quantity and timeliness of information provision. 	<p>To provide a simple, effective and consistent provision of responses to RFIs from ORR, enabling the prompt, accurate and easy to understand transfer of data between the two organisations.</p>	<p>Completed</p>	<p>These templates and use of shared documents internally have been in place since September 2024.</p> <p>Their use was reflected on positively at the ORR Focus Group session in January 2025.</p>
<p>Develop and agree Data Sharing Protocol for RIS3 (New)</p>	<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. 	<p>To ensure we have an agreed scope for the provision of cyclical data and information to ORR to meet its statutory requirements.</p>	<p>Business as usual for Interim Settlement (IS) activities.</p> <p>Ongoing for RIS3 activities</p>	<p>Interim Settlement Year activities are now moving into Business as Usual</p> <p>RIS3 Activities will be taken forward as a new activity in this updated plan.</p>
<p>Quarterly review of data provision feedback (New)</p>	<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. 	<p>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.</p>	<p>Ongoing</p>	<p>These reviews have been useful to keep ORR informed of activities and improvements made.</p>

<p>Develop guidelines for good provision for data for ORR (New)</p>	<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. 	<p>The provision of data and information to ORR is clear and consistent across all areas and reduces the need for ORR to ask follow up questions.</p>	<p>Now embedded in the Internal Awareness Training</p>	<p>These guidelines are now included in the Internal Awareness Training messages that are being rolled out across the company.</p>
<p>Improvements to cyclical meeting action completion and query management (Extension)</p>	<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. 	<p>Both organisations have a clear, easy to review and update 'Log' for the management of cyclical meeting actions and queries.</p>	<p>Now business as usual</p>	<p>These logs have been in place since September 2024. Their use was reflected on positively at the ORR Focus Group session in January 2025.</p>

Business as Usual Improvements

The intention of this focus Area was to ensure that we are ‘getting the basics right’, that we are rebuilding the trust between National Highways and ORR, keeping our promises and that PRC (latterly the ORR Relations Team) pivots from being largely a mediator of information to a facilitator of discussions and evidence gathering.

We are proud of what we have been able to achieve in the last six months in this area and these improvements have resulted in the following.

- The ORR Relations Team has had a transformational impact both internally and with ORR.
 - This fully resourced team is now seen within National Highways as the ‘go-to’ for all things ORR related – which has come about through the delivery of the Internal Awareness Training and the increased Internal Communication activities.
 - From an ORR perspective, the increase in the number of staff within this team and their focus on ensuring the interactions between National Highways and ORR are frictionless and continue to improve have been reflected in feedback at the Focus Group Session and in the Stakeholder Survey.
- Improvements to the internal management and National Highways/ORR engagement on the Escalator and Watchlist (E&WL) has seen a significant reduction in the number of items and the length of time areas of concern remain on the E&WL. Indeed, all the ‘sticky’ E&WL items have now been successfully resolved through proactive engagement and provision of detailed information by National Highways.

Activity	High-Level Description	Desired Outcome	Status	Next Steps
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.	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.	Completed	This team is now fully in place and both internally and externally its presence is making a dramatic difference to aid the internal awareness of ORR, and the importance of positive engagement by National Highways staff with ORR.

<p>Decision-making reporting improvements (Extension)</p>	<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>	<p>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.</p>	<p>Ongoing</p>	<p>The design, delivery and implementation of the Decision-Making Framework is still ongoing with plans in place with Internal Communications to embed this into the National Highways business planning processes.</p>
<p>Escalator and Watchlist (E&WL) – working level engagement (Extension)</p>	<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>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>	<p>Now business as usual</p>	<p>The E&WL is now a standing agenda item on the ORR Bilateral Agenda, and since September we have seen several long-standing E&WL items resolved.</p> <p>National Highways management of the E&WL is also now reported on at the Quarterly Business Review.</p>

Improved 'HELM' query management (Extension)

Continue to make improvements to the way in which queries are managed through the HELM mailbox, to include acknowledging queries, and the provision of a named person from the ORR Relations Team.

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.

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.

Ensuring all ORR Highways staff understand how HELM is managed and how best to interact with it.

Now business as usual

Improvements to the HELM Management is now business and usual and was reflected on positively at the ORR Focus Group session in January 2025.

Implement the Recommendations of the Rebel Group Report

We have continued to make improvements to our Licence Self Assurance activities following the Rebel Group Report, and significant steps have been taken in the past six months to lay the foundation for a broader, more encompassing Self Assurance process and activity for the Interim Settlement Year and RIS3.

Highlights from this Focus Area include

- The design, delivery and deployment of a new evidence system for Licence Self Assurance that will be much more fit for purpose and interactive.
- For the Interim Settlement Year, and going into RIS3, the new, improved License Self Assurance Programme will ensure all clauses in the Licence are reviewed each year.
- Internal Licence awareness within National Highways continues to improve through the Awareness Training and increased Internal Communication activities.
- Licence Accountability has now been fully updated and is being rolled out both as part of the Licence Self Assurance Programme and through the National Highways business planning processes.
- We are continuing to work with ORR to agree a set of principles on how risks of non-compliance and early warnings are monitored internally and notified to ORR.

Activity	High-Level Description	Desired Outcome	Status	Next Steps
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.	National Highways' Licence self-assurance activities and evidence will be contained in a fit for purpose and forward-looking system.	Completed	<p>The new evidence system is now in place and will be used from 1 April 2025 for the Interim Settlement Year.</p> <p>A new activity will be introduced to deliver this and the improved reporting to ORR ensuring that the Licence Self Assurance activity continues to improve.</p>

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.	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.	Completed (combined with the Internal Awareness Training)	Licence awareness training for key staff is now part of the internal awareness training.
Licence compliance accountability within the business (Extension)	Executive & Divisional Director level accountability for each Licence condition (where appropriate) agreed, and briefings/further training provided, as needed, for this.	Responsibility and accountability for Licence compliance and escalating issues is cascaded and owned throughout National Highways.	Ongoing	Licence accountability will now be included in the National Highways business planning process and by direct engagement from the ORR Relations Team with the relevant business leads.
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.	ORR will receive detailed quarterly reporting on National Highways' Licence self-assurance activities.	Ongoing	The new evidence system and reporting is now in place and will be used from 1 April 2025 for the Interim Settlement Year. A new activity will be introduced to deliver this and the improved evidence system to ORR ensuring that the Licence Self Assurance activity continues to improve.
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.	An agreed process in place for National Highways to notify ORR of Licence non-compliance or an early warning of possible non-compliance.	Ongoing	Work is underway to develop and agree a set of principles around the notification of non-compliance (or risk of non-compliance) by National Highways to ORR.

Internal ORR awareness training

This has been the Focus Area where we have seen the most meaningful change since the Investigation and the delivery of this Improvement Plan. Collectively the activities we have carried out have had a demonstrable impact within National Highways on the awareness of ORR, what it is that ORR does, and why it is important that it gets the engagement, information and data that it needs to carry out its functions effectively.

This can be demonstrated in the following ways

- Over 100 additional colleagues have now signed up to receive the monthly internal ORR E&WL notice, produced by the ORR Relations Team. This means that each month more than 320 people within the company are receiving this.
- Nearly 200 National Highways staff attended the Virtual ORR Roadshow in December 2024, and the recording of this roadshow has been viewed since nearly 100 times.
- Usage data for the dedicated ORR Relations Intranet Page shows that we are now seeing week on week increases in page views, page viewers and time spent per user.
- Our Internal ORR Awareness Sessions have already been delivered to more than 90 colleagues across 7 Divisions, and there is a full programme over the remaining 6 months to ensure all areas of National Highways business that have interactions with ORR receive this training.
- The commitment to further raising internal awareness of ORR and related activities at a senior level can be demonstrated through the inclusion of the new 'Escalator Management Score' and the results of the quarterly ORR Stakeholder Survey in the Customer, Strategy & Communication Directorate 'Top 10' each month in 2025 – 26 – which is in turn reported at the National Highways Quarterly Business Review.

Activity	High-Level Description	Desired Outcome	Status	Next Steps
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. 	To begin to raise awareness of ORR and the work of the ORR Relations Team within National Highways' business.	Completed (with regular updates ongoing)	The new ORR Relations Team Page is now a key resource used as part of the Internal Awareness Training

<p>Internal briefings by PRC to Senior Leadership Teams, Town Halls and other business meetings (Extension)</p>	<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. 	<p>A defined programme of ORR 'moments' integrated into the existing corporate communication and engagement plan for 2024 and 2025.</p>	<p>Now Business as Usual as part of wider Internal Communications Campaign.</p>	<p>Working with Internal Communications, the ORR Relations Team is supporting a wider ORR Awareness Communications Campaign as part of business-as-usual activities.</p>
<p>Awareness training for key staff (New)</p>	<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. 	<p>Upskill staff on the fundamentals of Roads Reform and the context on data provision and evidence of decision making to ORR.</p>	<p>Ongoing</p>	<p>The ORR Relations Team is delivering this training to those key areas of National Highways' business that have regular interactions with ORR, which is then complimented by the wider Communications Campaign.</p>

<p>Update and improve information relating to Regulation and ORR's role in the Company Induction (Extension)</p>	<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. 	<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>	<p>Completed, with a standing offer of more bespoke inductions from the ORR Relations Teams for relevant staff.</p>	<p>Improved information relating to regulation and ORR's role is now included at a high level in the Company Induction, this is also now complimented by bespoke inductions by the ORR Relations Team for new starters in those key teams that have regular interactions with ORR.</p>
<p>ORR Awareness Reviews for Key Staff</p>	<ul style="list-style-type: none"> 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. 	<p>Provide a baseline to gauge awareness of ORR and its role within National Highways and provide an ability to measure the effectiveness of communication and engagement efforts. It will also help inform our communication and engagement activities.</p>	<p>Now Business as Usual as part of wider Internal Communications Campaign.</p>	<p>We will continue to evaluate the success of the internal awareness training and the wider Communication Campaign to gauge how we are improving awareness.</p>

ORR Engagement

Since September we have continued to facilitate ORR Engagement with our National Highways colleagues across the business to help to develop more mature relationships, not just in the data and information space, but also to work to become seen as a trusted partner for ORR.

Some significant highlights in the past six months have included:

- We hosted ORR's Highways Committee members Anne Heal and Daniel Ruiz, along with members of the Highways Team at the Northwest ROC on 22 November 2024. We toured the control room, and watched how the operators managed the Stopped Vehicle Detection (SVD) alerts, we also demonstrated the Technology Hub and provided an update on the NEAR Programme. This was helpful to show ORR's board 'first hand' all the work National Highways is doing and improvements around use of data and the operation of on-road technology.
- Nearly 200 National Highways staff attended the Virtual ORR Roadshow in December 2024, and the recording of this roadshow has been viewed since nearly 100 times.
- We have facilitated Regional Operations visits to all six National Highways regions and x visits to Major Projects schemes including the A1 Birtley to Coal House, A428 Black Cat, A21 Safety Scheme, A417 Air Balloon, M2 Jct 5 in person and the A66 Trans-Pennine scheme 'on-line. This final visit for this series will be to the M3 Jct 9 in early April, and plans are underway to arrange the series of visits, both Operations and Major Projects for the Interim Settlement Year.

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 for ORR.	To continue to build regional relationships, for ORR to gather intelligence and to meet with our Regional Operations teams.	Ongoing	24-25 visits have been held successfully, and we are now in the process of arranging the 2025-26 series. We are also holding a lessons learnt session with ORR to ensure we take any learnings from last year into the net series of visits.
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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.	To continue to build regional relationships and gather intelligence, and to meet with our Major Projects teams across the country.	Ongoing	24-25 visits have been held successfully, and we are now in the process of arranging the 2025-26 series. We are also holding a lessons learnt session with ORR to ensure we take any learnings from last year into the net series of visits.
ORR Annual Assessment Workshop (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.	To ensure that there is collective 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.	Ongoing	We are beginning the processes to scope out the arrangements for a workshop with the relevant National Highways leads following ORR's publication in July 25.
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.	To enable ORR staff and Highways Committee members to experience the activities of the ROC and engage with ROC staff.	Now Business as Usual	Following a highly successful visit by ORR Non-Executive Directors to our Northwest ROC in November 2024, we will continue to facilitate these visits for both members of the ORR Highways Team and the ORR Board as required.
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.	To continue to improve the relationships at working level between ORR and PRC.	Now Business as Usual	We held a successful PRC/ORR Relationship Workshop in September 2024 – these will now revert to business as usual as and when required.

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.

Improved engagement between ORR's Highways Team and the wider National Highways business.

Now Business as Usual

We held an extremely well attended Virtual Roadshow in December 2024.

This was recoded and is now available for all National Highways staff, on the ORR Relations Team Intranet Page and is highlighted as part of the Internal Awareness Training.

ORR Reporting Engagement & Support

Throughout the year we have actively supported 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.

Most notably, since September we have been working closely with ORR and DfT to provide all the relevant information and data for the Annual Safety Report which has included

- 37 monthly meetings between September and late February on topics ranging from Operational Technology, Outages, NEAR Programme, Stopped Vehicle Detection (SVD), Road Safety and Health, Safety and Wellbeing. 22 Weekly meetings with ORR, National Highways and DfT and 4 bespoke workshops on SVD, Road to Zero Harm and Evaluation.
- The provision of more than 95 responses to ORR requests for information to inform the ORR Safety Report

Activity	High-Level Description	Desired Outcome	Status	Next Steps
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 will also ensure that we capture any lessons learnt from the process followed in 2023 – 24.</p>	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.	Now Business as Usual	As this update is being produced, we are just beginning the process of supporting ORR in production of its Annual Assessment in 2025, which will cover both the performance in 2024 – 2025 and the second Road Period as a whole.
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 our activities in line with the TSC6 recommendations.	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.	Now Business as Usual	<p>Working with ORR and DfT we have recently completed the 3rd ORR Annual Assessment of Safety on the Strategic Road Network (SRN).</p> <p>We will be working with ORR on the recommendations from this report in Q1 & Q2 of 2025 – 2026, before beginning the work for the 4th Report in Q3.</p>

Setting the Framework for Success in the Next Road Investment Strategy

Work in this Focus Area has had to be dynamic and agile, as we have worked with ORR and DfT, at pace to agree the Interim Settlement and continue with preparations for RIS3.

- The Interim Settlement Year introduces new trial approaches in a few critical areas, namely Safety, Delay and Customer, which will require a different approach to the sharing of data and information with ORR against published action plans that will enable a clearer link between our activities and likely outcomes.
- We have implemented an improved meeting structure to reflect these changes and will also be introducing a new Enhancements/Major Project Group to increase engagement in this area.

Activity	High-Level Description	Desired Outcome	Status	Next Steps
Improved meeting structure from April 2025 (New)	<p>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 all ORR meetings have the same 'look and feel' with secretariat 'rigour' applied to meeting papers and slides.</p>	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.	Now Business as Usual for the Interim Settlement Year.	The new reporting and meeting structures are in place for the Interim Settlement Year – and lessons learnt from this will be taken in to account in preparation for RIS3
Support ORR's updating of its Holding to Account Policy (New)	<p>Work with ORR as it updates its Holding to Account Policy (HtA), 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>	<p>Assist ORR to develop and implement a HtA Policy for the next Road Period that 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>	Completed	We fed into ORR's consultation on its Holding to Account Policy in Autumn 2024, and will work with ORR, as needed to facilitate the introduction of an updated policy for RIS3.

**Work with ORR
on its Monitoring
Reporting
Guidelines for the
next RIS
(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 agree with ORR the provision of data from April 2025, supporting ORR's development of its Monitoring Reporting Guidelines.

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.

Ongoing

We have been working with ORR since late 2024 on improvements to the reporting for the Interim Settlement Year and the lessons learnt from this will be taken in to account in preparation for RIS3.

Performance Framework Improvements

Again, for this Focus Area, we have had to recast our efforts since September to focus on developing and agreeing the Performance Framework for the Interim Settlement Year whilst also preparing for RIS3.

We are currently actively engaging with both ORR and DfT develop the RIS3 Capital and Performance Specifications and following the outcomes of the Government Spending Review in June 2025, we will be submitting our draft Strategic Business Plan to ORR for scrutiny via its Efficiency Review.

The Interim Settlement Year has provided us an opportunity to implement some significant changes to elements of the Performance Framework, which will allow these to be tested and demonstrated prior to agreeing for RIS3:

- For Safety, Customer & Delay we have produced actions plans which are intended to help government achieve its ambitions in these areas. We will re-focus our engagement with ORR in these areas to ensure we are providing evidence and demonstrating delivery on a quarterly basis to allow it to hold us to account to deliver these plans.
- On Renewals, we are currently working closely with ORR and DfT to ensure the right level of data, information and reporting is provided to both parties, given the increasing share of renewals in the Interim Settlement Year Investment Plan.

Activity	High-Level Description	Desired Outcome	Status	Next Steps
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>	The Pavement KPI for the next Road Period will overcome the technical challenges and deliver better long-term asset health.	Ongoing	Not all improvements have been able to be included in the Interim Settlement – on this particular activity improvements have been made to include tolerances in the Capital Specification.

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>	<p>The KPI impacts of Designated Funds projects are clearly set out from the on-set of the projects.</p>	<p>Ongoing</p>	<p>List of Designated Funds schemes for Safety are included alongside the Safety Action plan.</p> <p>We will work with ORR during the Interim Settlement Year, as we introduce the 'Strategic Mind' approach and 'Fund Sponsors'</p>
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>	<p>The Asset Management Strategy is embedded in the Capital Specification and there is a clear line of sight for specific structures schemes and outputs.</p>	<p>Ongoing</p>	<p>Descriptive commitments on Asset Data Quality and Cost Information are included in the Interim Settlement.</p> <p>Asset Health deliverables have been agreed, and we will provide an end of year report in April 2025.</p> <p>New reporting on Large Renewals for the Interim Settlement agreed.</p> <p>We are working to improve the structures commitments format for the full RIS3 plan</p>

<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>The Performance Framework for Enhancements allows the proportionate visibility of potential risks and that the early warning mechanisms are fit for purpose.</p>	<p>Ongoing</p>	<p>We have worked with ORR to introduce new Earned Value reporting for the Interim Year and will continue to develop reporting for the Interim Settlement Year and RIS3.</p> <p>New meeting in the ORR meeting structure on Enhancements and Major Projects to allow issues to be raised.</p>
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New & Ongoing Improvement Plan Activities



Overview of New and Ongoing Improvement Plan Activities

The following table is a summary of the new and ongoing activities in the updated plan within each of the focus areas and will form the basis of the Plan for the rest of the Plan Period through till the end of Q2 2025 – 26.

	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"> Quarterly review of data provision feedback with ORR – Ongoing Consider options for improved data transfer, including the use of ORR's Data Lakehouse - New
	1.2 - Business as usual improvements	<ul style="list-style-type: none"> Decision-making reporting improvements - Ongoing
	1.3 - Implement the Recommendations of the Rebel Group report	<ul style="list-style-type: none"> Deliver the improved evidence system and reporting to ORR – New Licence compliance accountability within the business – Ongoing Work with ORR to agree guidance on what it expects in relation to the reporting of a material breach – Ongoing
Theme 2 Training, awareness & communication	2.1 - Internal ORR awareness training	<ul style="list-style-type: none"> Awareness training for key staff - Ongoing ORR Awareness Review for key staff - Ongoing
	2.2 - ORR Engagement	<ul style="list-style-type: none"> ORR Annual Assessment review – in planning for July 2025. ORR Regional Operations Centre (ROC) visits - – 24-25 Visits completed, programme in development for 25-26.
	2.3 - ORR Reporting Engagement & Support	<ul style="list-style-type: none"> Continued ORR Annual Safety Report activity - Ongoing ORR Annual Performance Report activity – Ongoing

Theme 3
Preparedness for RIS 3

3.1 - Setting the Framework for Success in the Next Road Investment Strategy

- Assess the improvements made for the Interim Settlement Year and agree structure ahead of RIS3 – **New**
- Support ORR's in updating its Holding to Account Policy in preparedness for RIS3 - **New**
- Work with ORR on its Monitoring and Reporting Guidelines in preparedness for RIS3 - **Ongoing**

3.2 – Performance Framework Specification Improvements

- Review proposals in the April 2024 draft Strategic Business Plan (dSBP) on Pavement KPI - **Ongoing**
- Performance specification and capital commitments structure for RIS3 - **New**
- Designated Funds (value for money (VfM), decision-making and KPI benefits) - **Ongoing**
- Enhancement commitments – work with ORR the existing framework and provision of correct and proportionate visibility to ORR – **Ongoing**
- Alignment of DfT reporting on renewals with ORR OMR reporting - **New**

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

Theme	Activities	2025						
		Mar	Apr	May	Jun	Jul	Aug	Sep
Getting back into compliance & Improvements to Business as Usual	Improve the provision of data and information to ORR							
	Quarterly review of data provision feedback							
	Consider options for improved data transfer, including use of ORR's Data Lakehouse							
	Business as Usual Improvements							
	Decision-making reporting improvements					Company Wide Roll Out		
	Implement the recommendations of the Rebel Group report							
	Deliver the improved evidence system and reporting to ORR							
	Licence compliance accountability within the business							
Training, Awareness and Communication	Work with ORR to agree guidance on reporting of a material breach							
	Internal ORR Awareness Training							
	Awareness Training for key staff							
	ORR Awareness reviews for key staff							
	ORR Engagement							
	ORR Annual Assessment review							
	ORR Regional Operations Centre (ROC) visits							TBD
	ORR Reporting Engagement and Support							
Preparedness for RIS3	ORR Annual Performance Report review							
	ORR Annual Safety Report activity							
	Setting the Framework for Success in RIS3							
	Assess the improvements made for the IS Year and agree structure ahead of RIS3							
	Support ORR's in updating its Holding to Account Policy in preparedness for RIS3							
	Work with ORR on its Monitoring Reporting Guidelines in preparedness 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							

Delivering the Plan



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

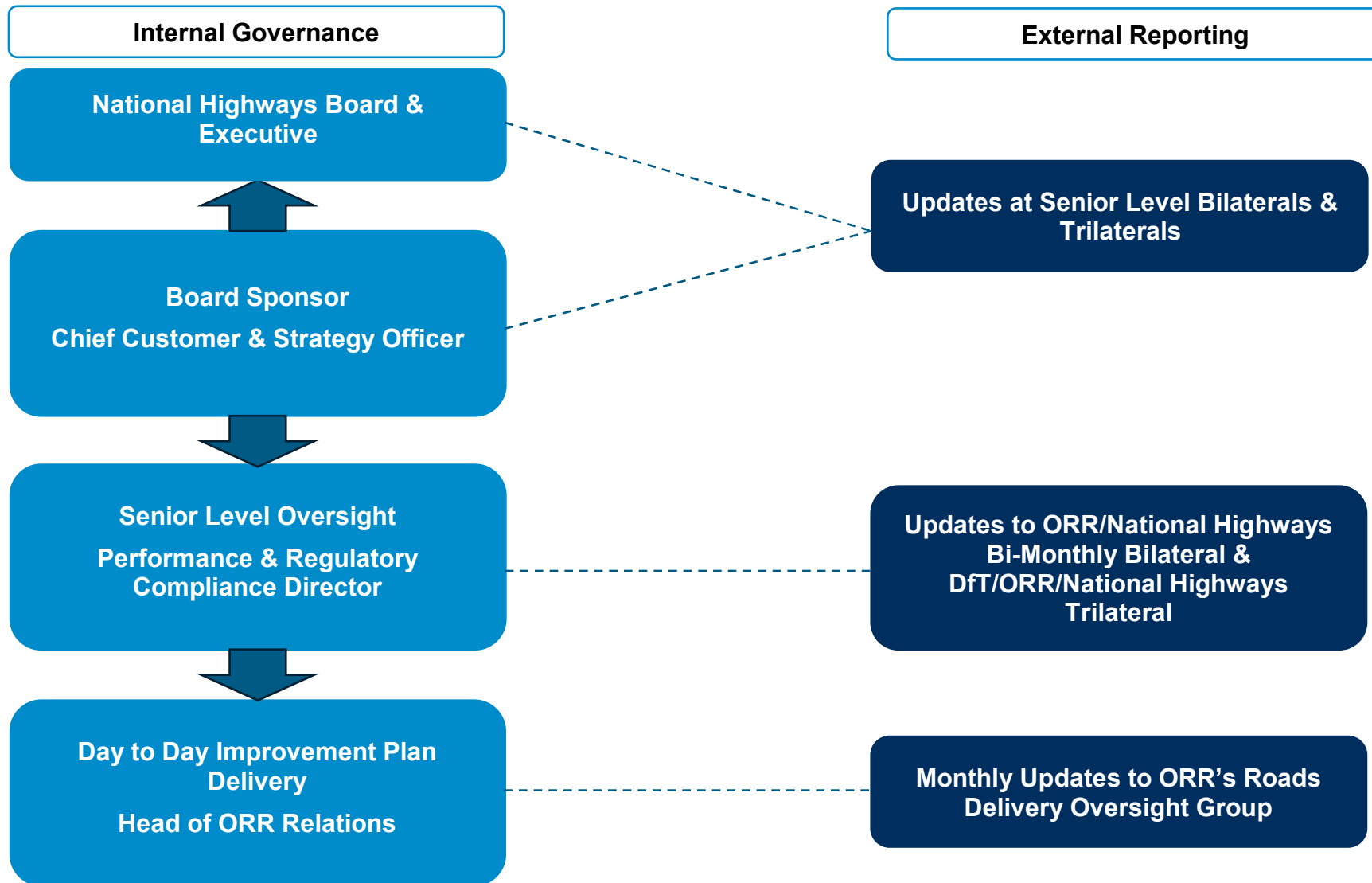


- We will continue to provide a monthly update to ORR to cover all our activities set out in the Improvement Plan, along with any milestones achieved or at risk.
- This will take the form of a Dashboard and will be provided to ORR five working days ahead of its Road Delivery Oversight Group (RDOG) each month.
- We will also continue to provide updates 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 remains delegated by National Highways' Executive Committee to our Chief Customer and Strategy Officer.
- Day to day oversight of the activities remains with 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.