

# Transport for the North

## Rail North Committee Meeting

### Item 8.0

**Subject:** Performance Update

**Author:** Tom Davidson, Transport Planner

**Sponsor:** David Hoggarth, Strategic Rail Director

**Meeting Date:** Thursday 20<sup>th</sup> June 2019

#### **1. Purpose of the Report:**

- 1.1 The Committee is asked to **note** the performance update and additional passenger impact measures now included.

#### **2. Executive Summary:**

- 2.1 This report provides an update on rail performance statistics for Northern and TransPennine Express (TPE). The report includes enhanced information about the passenger impact of short formations and an analysis of passenger complaints (initially for Northern).

#### **3. Performance Overview:**

- 3.1 Performance has stabilised since December 2018 but is still subject to variation and both operators are still performing below the (Public Performance Measure (PPM) targets set in their Franchise Agreements.
- 3.2 Despite some network incidents, performance following the May 2019 timetable change was significantly better than that in May 2018, building on improvements achieved since performance improvement measures were implemented in December 2018.
- 3.3 Capacity provision remains a key concern for both operators with short formations leading to overcrowding at peak times. Both operators are in the process of rolling out new trains which will, in part, address some of the overcrowding issues.

#### **4. TransPennine Express Performance**

##### **Public Performance Measure**

- 4.1 TPE's Public Performance Measure (PPM) averaged 69.8% from 20 May 2018 to the start of the new timetable on 9 December 2018. From 9 December 2018 to 30 March 2019 it averaged 84.4%.
- 4.2 Over the last 28 days of operation (28 April 2019 to 25 May 2019) PPM has averaged **85.4%**. This compares to a year ago when in May 2018 the average PPM figure was **75.5%**.

##### **Cancellations**

- 4.3 Over the last 28 days of operation (28 April 2019 to 25 May 2019), an average of 20 trains were cancelled (or part cancelled) each day. This represents 6.1% of the overall number of services. Of these, approximately 67% were caused by other train operators or Network Rail.

##### **Short Formations**

- 4.4 TPE's Short Formation statistics reflect how many trains did not run with the capacity set out in the train plan. Recent figures show a reduction in the number of trains running shorter than the planned length.
- 4.5 TPE are working with TfN to provide better data regarding capacity provision, as well as additional complaints analysis in line with that now provided by Northern.

#### **5. Northern Performance**

##### **Public Performance Measure**

- 5.1 Northern's Public Performance Measure (PPM) averaged 78.0% from 20 May 2018 to the start of the new timetable on 9 December 2018. From 9 December 2018 to 30 March 2019 it averaged 86.1%.
- 5.2 Over the last 28 days of operation (13 May 2019 to 19 June 2019) Northern's PPM has averaged **84.9%**. This compares to a year ago when in May 2018 the average PPM figure was **77.6%**.

##### **Cancellations**

- 5.3 Over the last 28 days of operation (13 May 2019 to 19 June 2019), an average of 99 trains were cancelled or part cancelled each day. This represents 3.8% of the overall number of services, compared to an average of 2,635 trains per day. Of these cancellations, approximately 41% were caused by other train operators or Network Rail.

- 5.4 Northern have continued to implement pre-planned cancellations on Sundays in the North West (excluded from the statistics above).

#### **Short Formations**

- 5.5 TfN has worked with Northern on a new measure of daily capacity delivery involving a much clearer analysis of the actual passenger impact.
- 5.6 Every train in the plan has a booked formation and daily variations are tracked by the operator. The key passenger impact is when a variation from the plan results in the train being too small to accommodate the number of passengers who either face very crowded journeys or are unable to board. The new measure tracks daily formations against the estimated loadings and provides an indication (by city) of the number of passengers (on average) unable to board due to short formations. This measure will be refined further and tracked over time to provide a clearer picture of the passenger impact and allow the operator to improve their deployment of trains.
- 5.7 Northern's initial analysis of capacity delivery shows that in Period 2 of 2019/20 (28 April 2019 to 25 May 2019) an average of 86 passengers a day were unable to board on Manchester area services, with 48 Leeds passengers being unable to board the train they intended to catch. Note that this was prior to the introduction of additional rolling stock in the May 2019 timetable.

## **6. Appendices:**

- 6.1 Appendix 1: TransPennine Express performance charts.
- 6.2 Appendix 2: Northern summary performance charts.
- 6.3 Appendix 3: Northern service group analysis.
- 6.4 Appendix 4: Sector comparison.

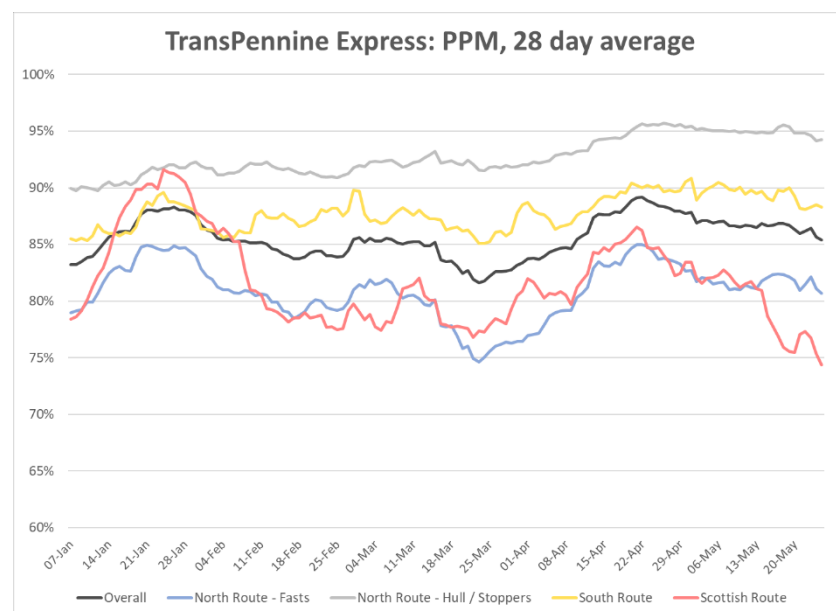
## Appendix 1: TPE Performance Charts

### Public Performance Measure

The chart below shows the percentage of trains arriving at their destination station within 10 minutes, including a breakdown by TPE route. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

TPE's 28-day average of PPM has slightly reduced from approximately 88% at the end of April to 85% by the end of April, caused in part by some extreme weather events. The Scottish route and Fast services on the North route have suffered low PPM scores in comparison with other routes, whilst Hull / stopping services on North route have the highest PPM of any sub-group.

In May 2018 TPE's average PPM score was **75.5%**. Comparisons with industry averages are shown in Appendix 4.



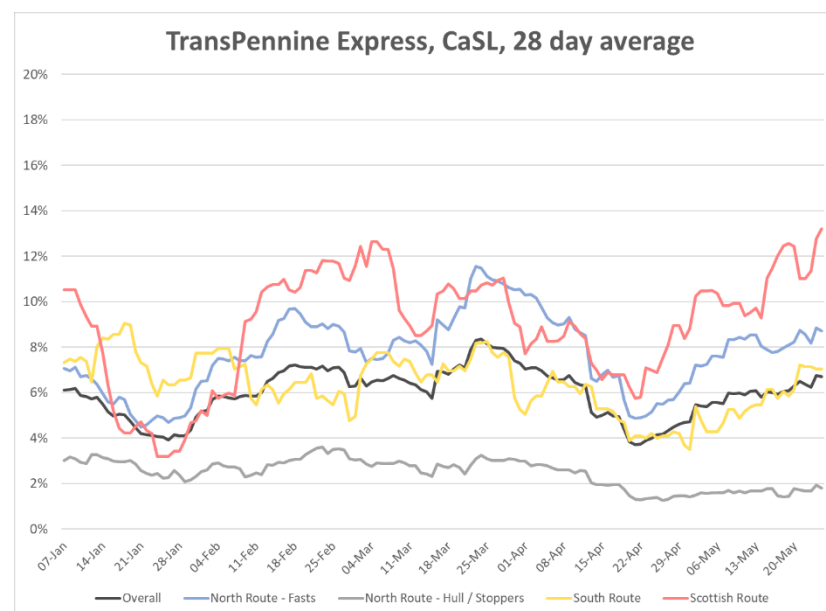
Source: TPE performance reports – provisional data, prior to final reconciliation

### Cancelled / Over 30 mins Late

Over the same period, the chart below shows the proportion of trains cancelled or over 30 minutes late.

Consistent with the PPM chart, a gradual increase in disruption has been seen over the last 4 weeks. A higher number of cancellations and long delays have been experienced on the Scottish route and fast services on the North route.

In May 2018 TPE's average CaSL score was **11.2%**. Comparisons with industry averages are shown in Appendix 4.



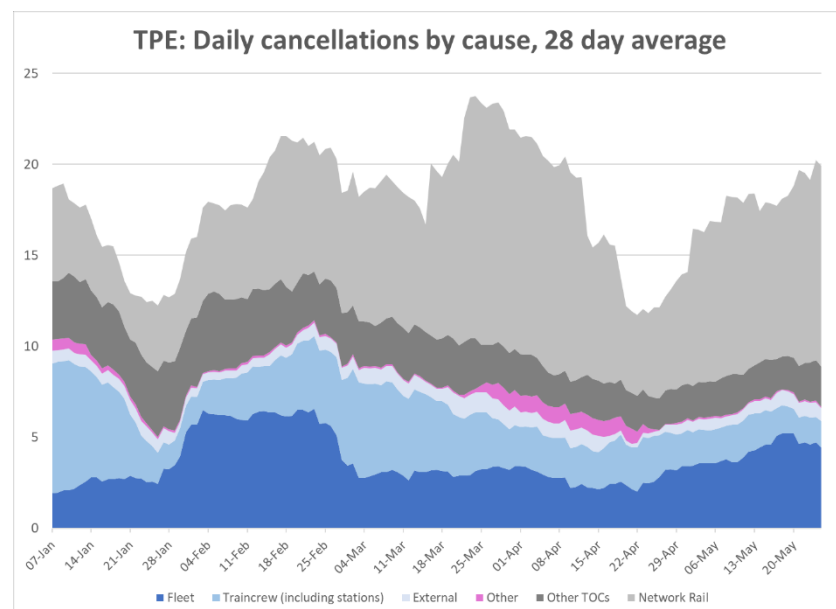
Source: TPE performance reports – provisional data, prior to final reconciliation

## Cancellations by Cause

The chart below shows the cause of cancellations and part cancellations on TPE services across all routes. A 28-day moving average is shown.

In the last 4 weeks the average number of cancellations and part-cancellations per day has increase from 13 to 20. In the latter part of the review period, a spike in Network Rail and fleet-related cancellations affected the overall total.

TPE-caused factors have varied over the last few months, currently accounting for approximately 7 daily cancellations.

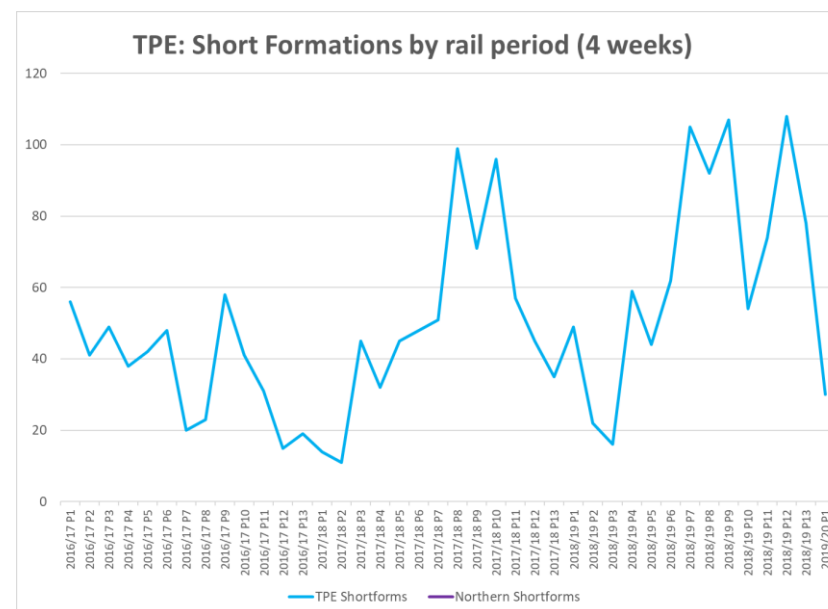


Source: TPE performance reports – provisional data, prior to final reconciliation

## Short Formations

The chart below shows the number of Short Formations per period, as measured by Schedule 7.1 of the Franchise Agreement. This reflects the number of services running with less capacity than planned, excluding cancellations.

The most recent data (from 01 April to 27 April 2019) shows a reduction in the number of services operated with less capacity than planned. In previous months there had been a number of external fleet incidents (including a spate of recent fatalities and bird strikes) exacerbating the number of cancellations and short formations, as units are taken out of service for repair.



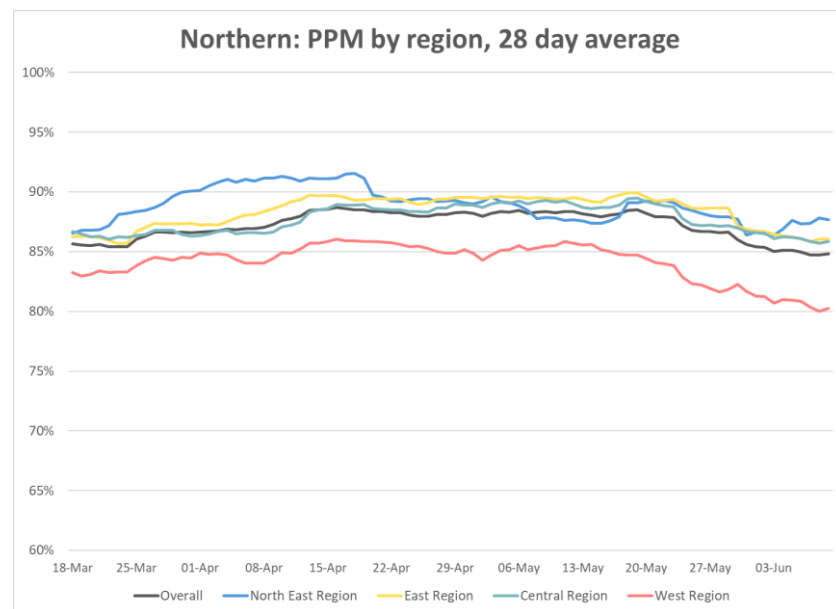
Source: TOC short formation statistics as per Schedule 7.1 of the Franchise Agreement

## Appendix 2: Northern Performance Charts

### Public Performance Measure

The chart below shows recent PPM figures for Northern, disaggregated by region. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

Recent figures shown relatively consistent results, with a slight decline in overall PPM from approximately 88% to 85% over the last 4 weeks. The West region has continued to experience lower PPM than other service groups. Analysis by service group is provided in Appendix 3, with industry comparisons shown in Appendix 4.

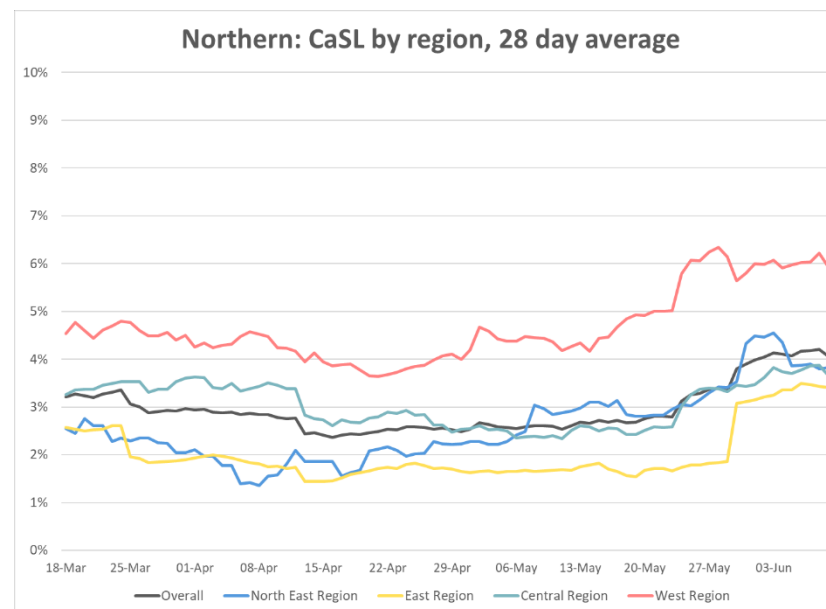


Source: Northern performance reports – provisional data, prior to final reconciliation

### Cancelled / Over 30 mins Late

The chart below shows the percentage of trains cancelled or over 30 minutes late, split by region.

Northern's overall rolling average has increased to over 4% in recent weeks. Consistent with the PPM results, performance in the West region is worse than in the other 3 regions. Causation is shown overleaf and analysis by service group is shown in Appendix 3.

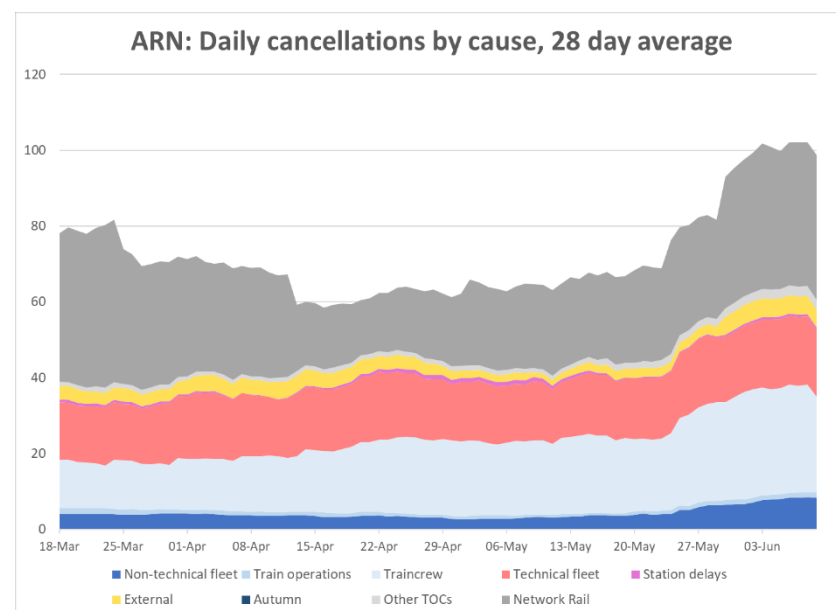


Source: Northern performance reports – provisional data, prior to final reconciliation

## TOC-on-Self Cancellations by Region

The chart below shows the cause of cancellations and part cancellations on Northern services across all routes. As for other statistics a 28-day rolling average is used.

In recent weeks approximately 100 trains have been cancelled or part cancelled each day; with an average of 2,365 trains planned per day, this equates to approximately 3.8% of the total. The main cause of variability is Network Rail-related issues, though Traincrew and fleet causes have increased noticeably in recent weeks.



Source: Northern performance reports – provisional data, prior to final reconciliation

## Passengers in Excess of Capacity

Northern have worked with Transport for the North to provide detailed estimates of passenger crowding for peak trains into the 5 major cities. The first period of data, covering 1<sup>st</sup> April to 27<sup>th</sup> April, is shown below.

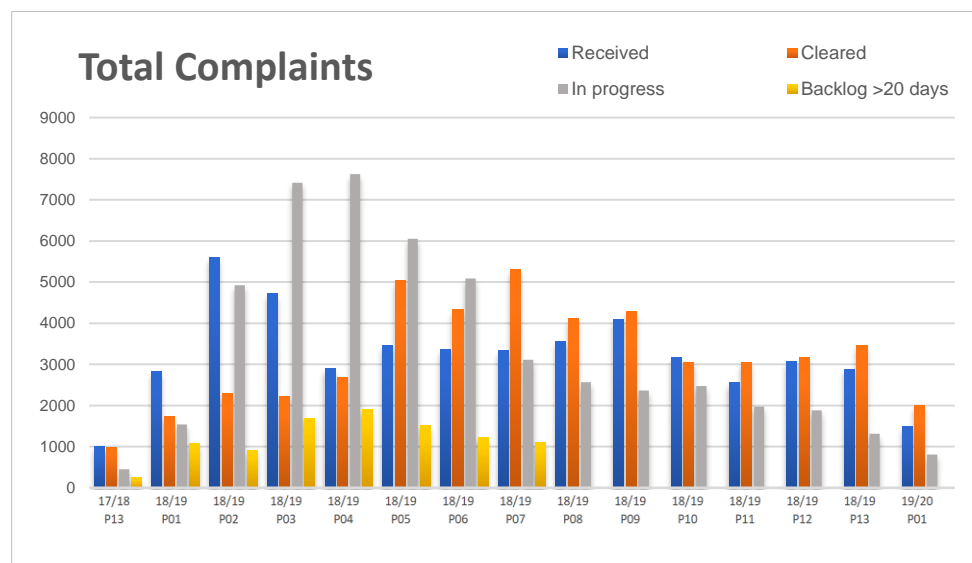
Col A shows the ratio of services that were delivered in line with the train plan  
Col B shows the ratio of services meeting the required capacity for demand  
Col C shows the proportion of required capacity that was not delivered  
Col D shows the amount of 'passenger spaces' planned but not delivered  
Col E shows the estimated number of passengers who were unable to board

Passengers in Excess of Capacity 2019/20 Period 01					
Location	A) Plan of the day unit formation or larger	B) Minimum required unit formation or larger	C) Percentage of minimum capacity not delivered	D) Average passenger spaces not delivered per day	E) Estimated passengers unable to board per day
Leeds	83.06%	96.37%	0.89%	258	48
Liverpool	88.34%	98.66%	0.72%	37	13
Manchester	84.65%	96.79%	1.15%	472	86
Newcastle	86.83%	99.78%	0.02%	1	0
Sheffield	80.62%	97.81%	0.48%	35	3
<b>Total</b>				<b>803</b>	<b>150</b>

Source: Northern analysis of capacity delivered vs estimated loading

## Total Complaints

The number of complaints by rail period is shown below, covering the period March 2017 to May 2019. In this time there has been a marked increase in line with the reliability issues seen in May 2018, with recent results being much closer (though still higher) than the values achieved in March 2017.

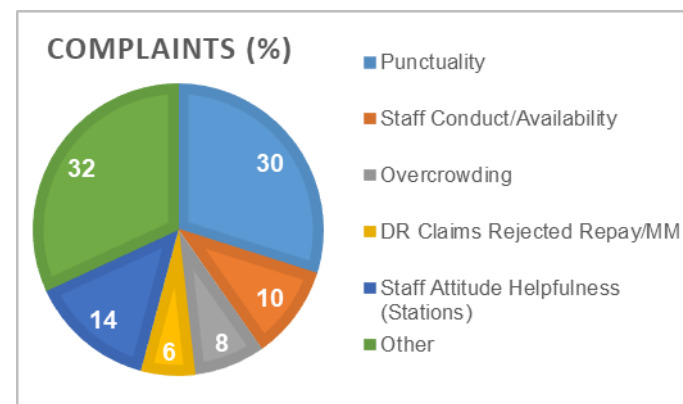
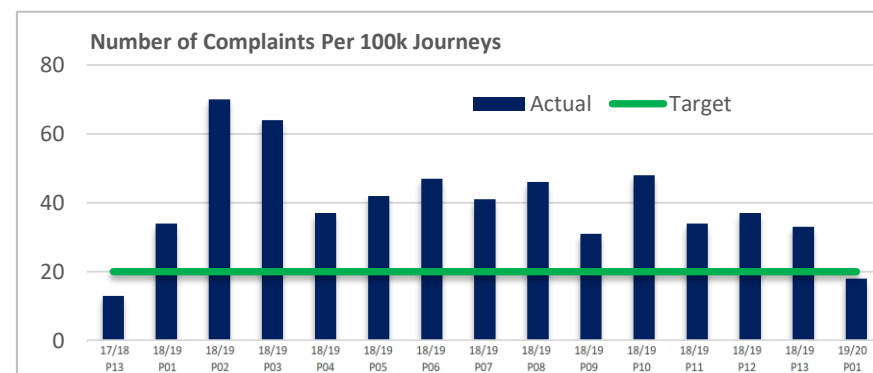


Source: Northern

## Complaints Analysis

The bar chart below shows the rate of complaints per 100,000 journeys. As for the total number of complaints, this peaked in the early part of 2018/19 and has started to reduce closer to 2017 levels in recent months.

The pie chart shows the percentage of complaints by category in Period 1 of 2019/20 (April 1<sup>st</sup> to April 27<sup>th</sup> 2019). This shows that punctuality and staff helpfulness are the two most significant causes of complaint.



Source: Northern

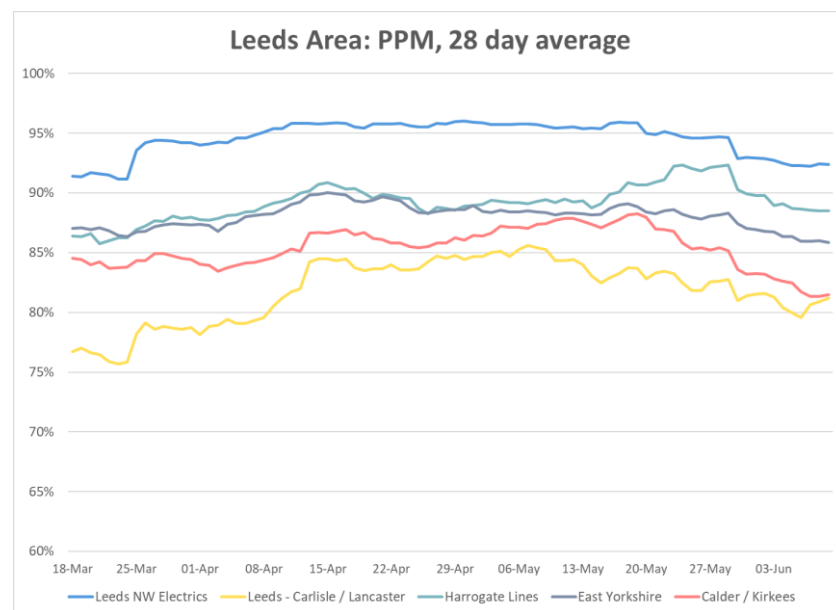


## Appendix 3: Northern Service Group Analysis

### Leeds Area: Public Performance Measure

The chart below shows recent PPM figures for Leeds NW electrics, Carlisle / Lancaster, Harrogate, East Yorkshire and Calder / Kirklees. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

Since the timetable change on 19 May 2019 there has been a slight deterioration in PPM performance. Disruption on 30 May 2019 due to a trespass incident at Leeds had a significant impact on all service groups.



#### Leeds NW Electrics:

Leeds / Bradford FS – Skipton  
Leeds / Bradford FQ – Ilkley  
Leeds – Bradford Foster Square

#### Leeds – Carlisle / Lancaster

Leeds – Lancaster / Morecambe  
Leeds – Carlisle

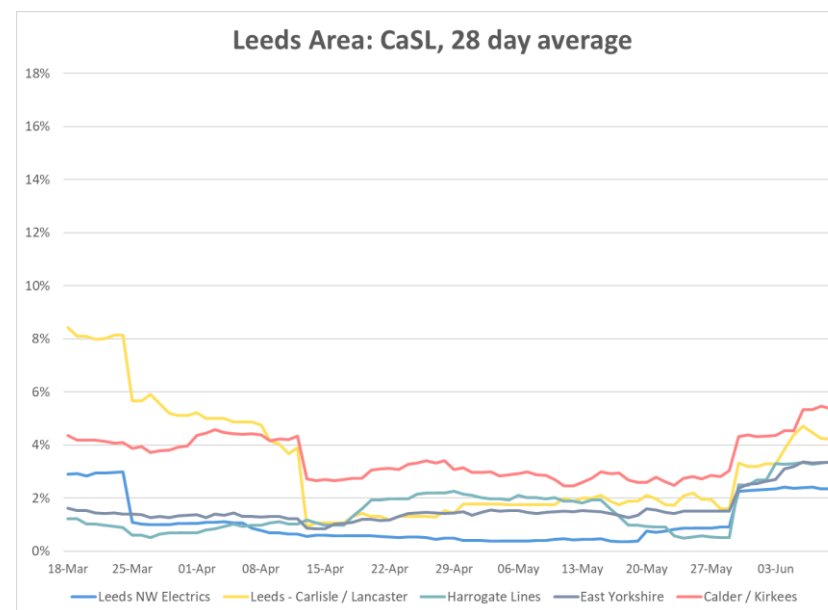
#### Harrogate Lines

Leeds – Harrogate – York  
Leeds – Knaresborough

### Leeds Area: Cancelled / Over 30 mins Late

For the same service groupings as used for PPM, the chart below shows the percentage of trains cancelled or over 30 minutes late in the Leeds area (the rail industry's CaSL measure).

As for PPM, CaSL results have increased slightly following the timetable change, but the most significant event was the trespass incident on 30 May 2019.



#### East Yorkshire:

Hull – Scarborough  
Hull – York  
Leeds – Selby  
Leeds – York  
York – Huddersfield

#### Calder / Kirklees:

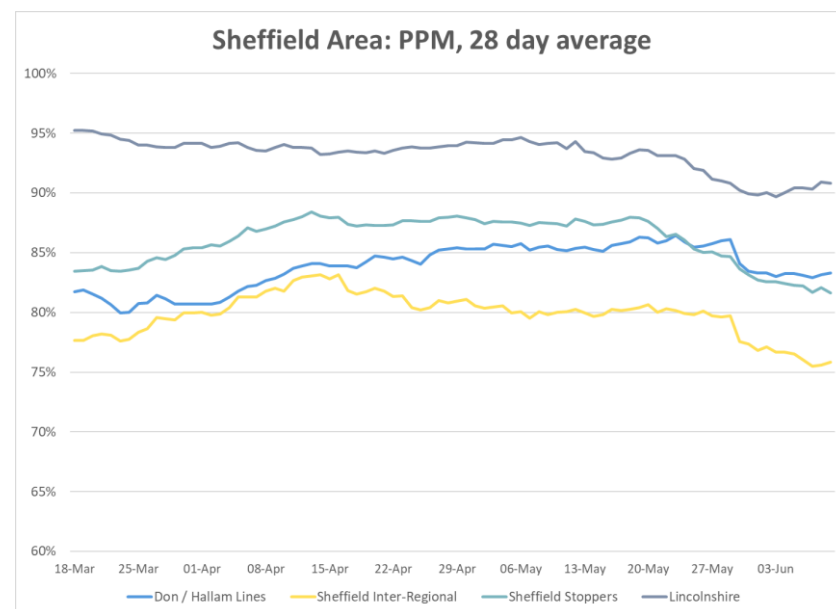
Blackpool North – Leeds/Yrk  
Blackpool Nth – Leeds  
Huddersfield – Wakefield Kirkgate  
Southport – Leeds  
York/Selby – Manchester Victoria

\*Please note all numbers are provisional as supplied prior to final reconciliation.

### Sheffield Area: Public Performance Measure

The chart below shows recent PPM figures for Don / Hallam lines, Lincolnshire, and inter-regional / stopping services around Sheffield. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

In the Sheffield area there is a notable disparity between services operating in Lincolnshire (with fewer congestion issues) and those in and around Sheffield. Lincolnshire services are typically average around 94%, whilst services in and around Sheffield average between 80% and 87%. Recent weeks have seen a decrease in reliability, with the most significant impact being the Leeds trespass incident (affecting services across Yorkshire).



#### Don / Hallam Lines

Leeds – Sheffield via Moorthorpe  
Doncaster – Leeds  
Leeds – Barnsley -Sheffield (Stoppers)  
Leeds – Knottingley  
Goole – Leeds

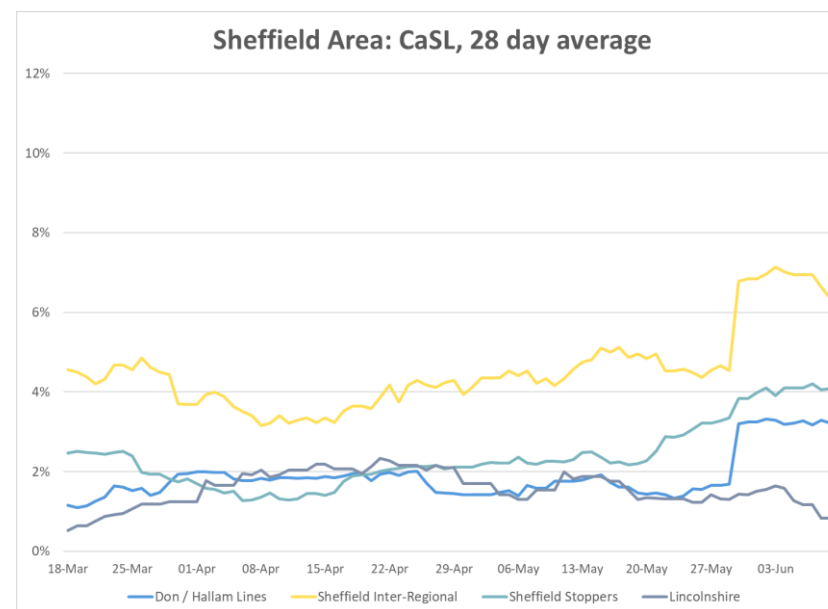
#### Sheffield Inter-Regional

Leeds – Lincoln via Sheffield  
Leeds – Nottingham  
Nottingham – Sheff – Barnsley – Leeds

### Sheffield Area: Cancelled / Over 30 mins Late

For the same service groupings as used for PPM, the chart below shows the percentage of trains cancelled or over 30 minutes late in the Sheffield area (the rail industry's CaSL measure). A 28-rolling average is used.

There is a notable difference in the level of severe delays and cancellations for Sheffield Inter-Regional services, running at approximately 5% to 7% CaSL in recent weeks; exacerbated by the incident at Leeds on May 30<sup>th</sup>. This issue also affected the Don / Hallam lines.



#### Sheffield Stoppers

Adwick – Sheffield  
Hull – Sheffield  
Sheffield – Huddersfield  
Sheffield – York

#### Lincolnshire

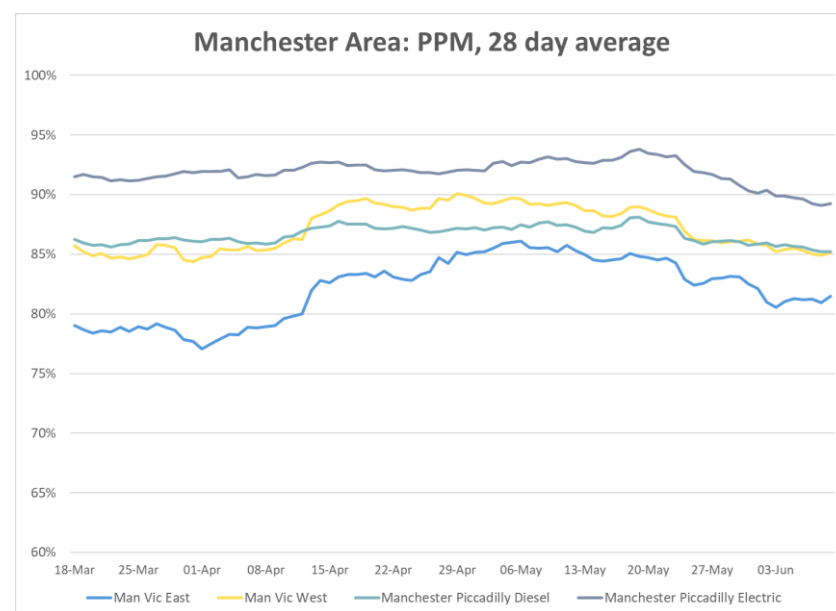
Cleethorpes – Gainsborough  
Barton on Humber – Cleethorpes  
Doncaster – Scunthorpe  
Sheffield – Lincoln

\*Please note all numbers are provisional as supplied prior to final reconciliation.

### Manchester Area: Public Performance Measure

The chart below shows recent PPM figures for Manchester-based service groups serving Piccadilly and Victoria. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

In recent weeks results have decreased slightly, particularly for Manchester Victoria East services (linked to Leeds through the Calder Valley and therefore tied to the trespass incident on 30 May 2019).



#### Man Vic East

Blackburn – Man Vic via Todmorden  
Man Vic – Castleton – Rochdale  
Man Vic – Stalybridge

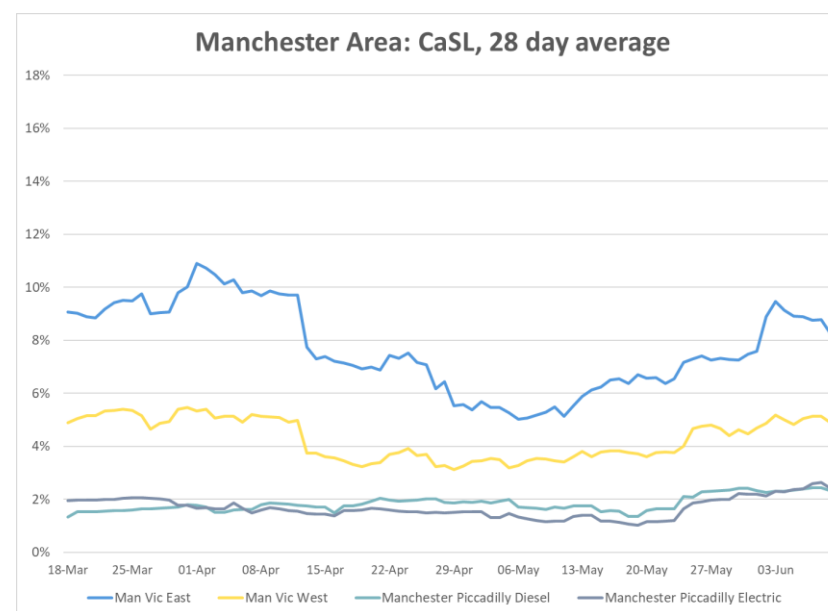
#### Man Vic West

Clitheroe – Man Vic via Bolton  
Kirby – Man Vic  
Rochdale – Blackburn  
Wigan – Stalybridge

### Manchester Area: Cancelled / Over 30 mins Late

For the same service groupings as used for PPM, the chart below shows the percentage of trains cancelled or over 30 minutes late in the Manchester area (the rail industry's CaSL measure). A 28-rolling average is used.

A notable difference is seen in Manchester Victoria and Manchester Piccadilly services. Services at Victoria have a CaSL of between 5% and 8% CaSL, in comparison to figures of 2.2% for Piccadilly service groups.



#### Manchester Piccadilly Diesel

Man Picc – Huddersfield  
Man Picc – Chester  
Man Picc – Marple/Rose Hill  
Man Picc – New Mills Central  
Man Picc – Sheffield  
Man Picc/Deansgate – Hazel Grove – Buxton  
Southport – Alderley Edge

#### Manchester Piccadilly Electric

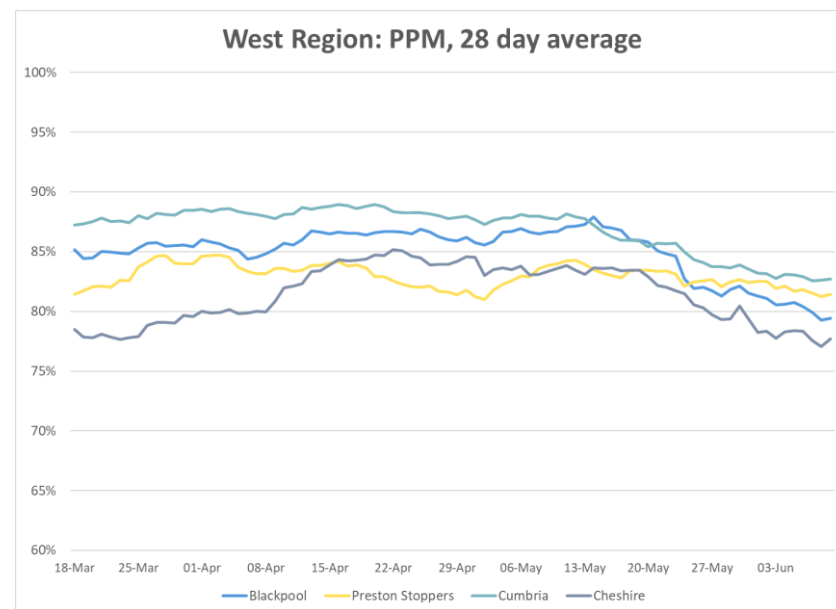
Man Picc – Stockport – Alderley Edge/Crewe  
Man Picc – Crewe via Stockport  
Man Picc – Crewe via Man Airport  
Man Picc – Hadfield  
Man Picc – Hazel Grove  
Man Picc – Macclesfield – Stoke On Trent

\*Please note all numbers are provisional as supplied prior to final reconciliation.

## West Region: Public Performance Measure

The chart below shows recent PPM figures for Blackpool, Preston, Cumbria and Cheshire service groups. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

As shown in the regional comparison in Appendix 2, services in the West Region typically have lower PPM scores than other regions. This impact has worsened in recent weeks, with PPM averaging 78% to 83% across the 4 service groups.



### Blackpool

Blackpool Nth – Liverpool  
Blackpool Nth – Liverpool (Stoppers)  
Blackpool Nth – Man Airport (Express)  
Blackpool Nth – Preston  
Liverpool – Preston – Blackpool

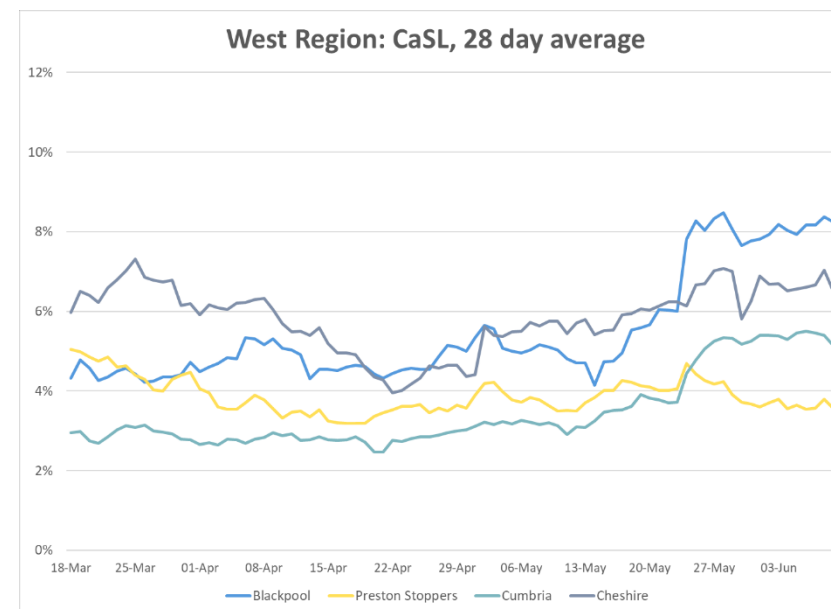
### Preston Stoppers

Blackpool South – Colne  
Man – Blackpool Nth (Stoppers)  
Man – Preston (Stoppers)  
Preston – Ormskirk

## West Region: Cancelled / Over 30 mins Late

For the same service groupings as used for PPM, the chart below shows the percentage of trains cancelled or over 30 minutes late in the West Region. A 28-rolling average is used.

Mirroring the PPM scores, a higher level of cancellations and seriously late trains is typically seen on West region routes. Since the timetable change this has become most pronounced on Blackpool services (~8%) and Cheshire services (~6.5%).



### Cumbria

Barrow – Preston  
Cumbria Coast  
Lancaster – Morecambe  
Man Airport – Preston / Barrow  
Windermere – Oxenholme

### Cheshire

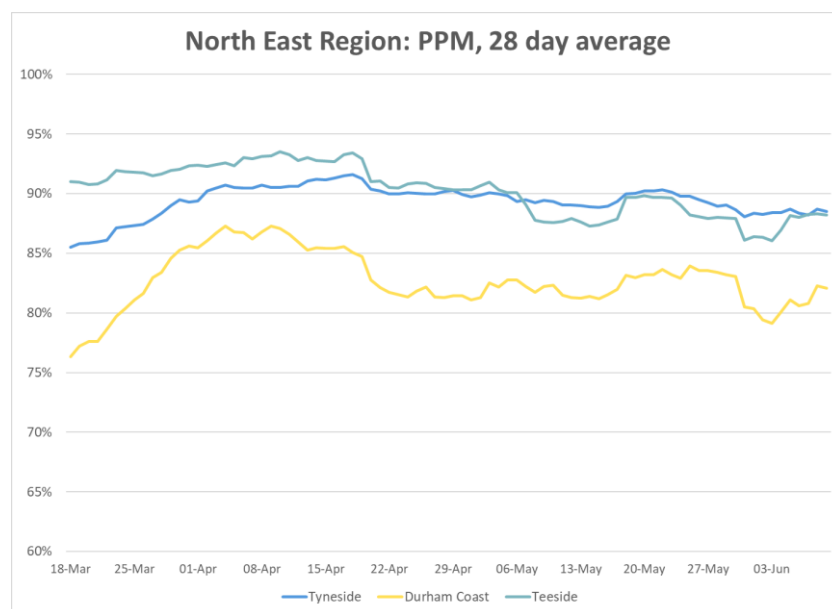
Liverpool – Crewe via Man Picc  
Liverpool – Man Airport via Warrington Central  
Liverpool – Oxford Road via Warrington Central  
Liverpool – Wigan North Western  
Liverpool – Warrington BQ – Ellesmere Port

\*Please note all numbers are provisional as supplied prior to final reconciliation.

### North East Region: Public Performance Measure

The chart below shows recent PPM figures for Tyneside, Durham Coast and Teeside service groups. A 28-day moving average is shown, in order to show recent trends without the day-to-day variation of extreme weather events, for example.

Services on the Durham Coast have continued to suffer a significant reduction in reliability in recent weeks, with PPM of just over 80%.



#### Tyneside

Chathill – Newcastle  
Saltburn – Chester Le Street – Carlisle  
Newcastle – Carlisle  
Newcastle – Hexham

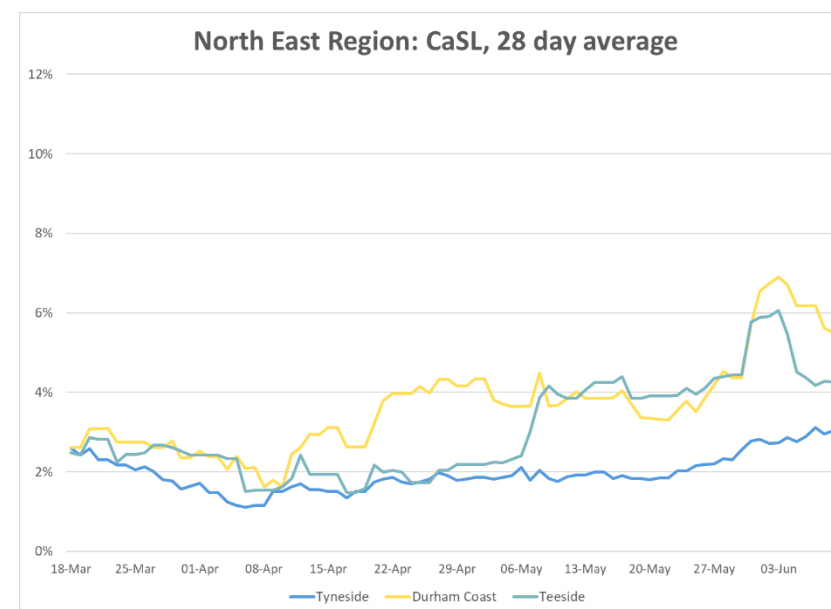
#### Durham Coast

Newcastle – Middlesbrough

### North East Region: Cancelled / Over 30 mins Late

For the same service groupings as used for PPM, the chart below shows the percentage of trains cancelled or over 30 minutes late in the North East Region area (the rail industry's CaSL measure). A 28-rolling average is used.

The number of cancellations in the North East has stayed relatively stable at less than 4%, other than a recent period of disruption to Durham Coast and Teeside services.



#### Teeside

Saltburn – Bishop Auckland  
Whitby – Middlesbrough

\*Please note all numbers are provisional as supplied prior to final reconciliation.

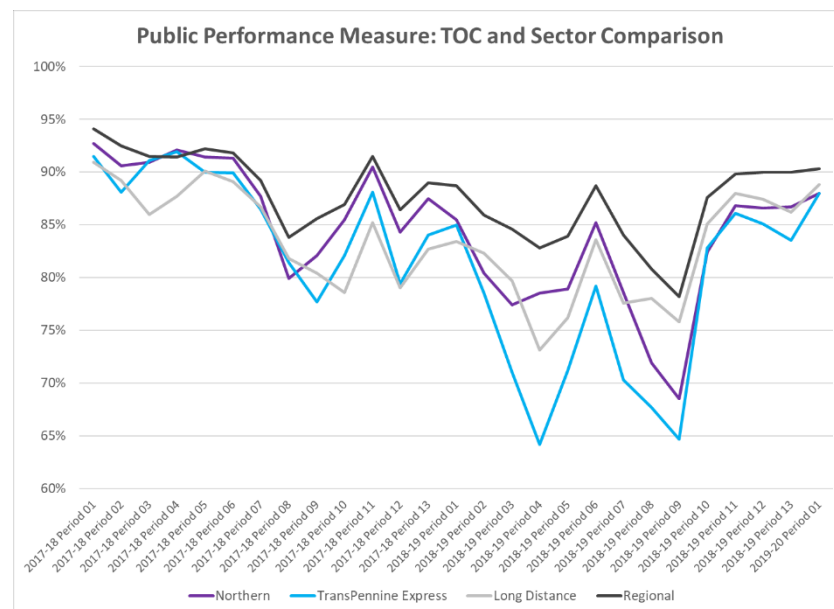
## Appendix 4: National Comparison

### Public Performance Measure

The chart below shows the PPM for Northern, TPE, long distance operators and regional operators, from April 2017 to April 2019.

Northern's PPM is typically slightly lower than the national average for regional operators, but over the last 12 months the figures has been up to 5% lower. TPE's PPM was previously slightly higher than the industry average for long distance operators, but over the last year it had tracked noticeably lower than the national average.

Figures have improved since December 2018, when timetable changes were made to increase reliability. PPM figures now closely match the sector averages, albeit at a lower level than in April 2017.



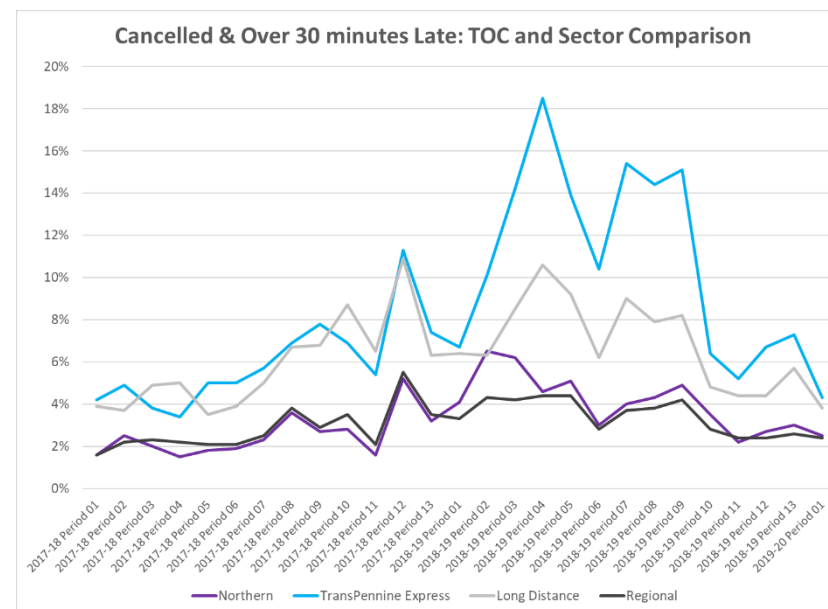
Source: ORR website

### Cancelled / Over 30 mins Late

The chart below shows the percentage of Cancelled / Seriously Late trains for Northern, TPE, long distance operators and regional operators, from April 2017 to April 2019.

Northern's statistics have over the last year been at approximately 4%, slightly higher than the national average. TPE's figures have at times been significantly higher than the national average for distance operators.

As for PPM, results for both TOCs have significantly improved since December 2018. Northern's results are in line with the national average for regional operators, and TPE results were almost equal to the long distance average.



Source: ORR website

### Complaints per 100,000 passenger journeys (all data as previously reported)

The table below shows the number of complaints per 100,000 passenger journeys across all TOCs. Data is shown quarterly and runs to 2018/19 Quarter 3, ending in December 2018 (therefore prior to the performance-related timetable changes in December 2018 having an impact). TOCs have been ranked according to the last Quarter's results.

TransPennine Express were ranked 3<sup>rd</sup> of all operators in terms of claim rate, which had increased from **38.7** at the start of the franchise to **76.2** by 2018/19 Quarter 3.

Northern were ranked 7<sup>th</sup>. However, the proportional increase is more significant – increasing from **11.0** in 2016/17 Quarter 1, to **51.6** in 2018/19 Quarter 3.

Train operating company	2016-17 Quarter 1	2016-17 Quarter 2	2016-17 Quarter 3	2016-17 Quarter 4	2017-18 Quarter 1	2017-18 Quarter 2	2017-18 Quarter 3	2017-18 Quarter 4	2018-19 Quarter 1	2018-19 Quarter 2	2018-19 Quarter 3
Virgin Trains West Coast	172.9	144.1	135.5	165.9	157.6	154.2	155.7	177.2	191.4	168.5	141.5
London North Eastern Railway	164.7	66.4	101.2	103.1	95.7	142.2	134.7	96.1	102.7	117.2	102.7
<b>TransPennine Express</b>	<b>38.7</b>	<b>22.8</b>	<b>27.8</b>	<b>61.4</b>	<b>41.3</b>	<b>36.9</b>	<b>42.6</b>	<b>57.9</b>	<b>50.0</b>	<b>53.4</b>	<b>76.2</b>
East Midlands Trains	54.9	54.2	38.9	47.9	51.9	45.8	55.2	54.0	43.9	59.5	71.6
CrossCountry	56.4	59.9	53.8	52.2	42.0	56.8	77.8	85.1	58.7	63.4	64.6
Great Western Railway <sup>1</sup>	29.4	26.9	25.8	38.7	38.6	43.5	51.7	61.7	61.2	78.7	63.3
<b>Northern</b>	<b>11.0</b>	<b>15.5</b>	<b>17.8</b>	<b>23.1</b>	<b>16.0</b>	<b>18.2</b>	<b>13.2</b>	<b>13.8</b>	<b>25.9</b>	<b>56.5</b>	<b>51.6</b>
TfW Rail	70.9	74.7	28.0	35.3	105.8	46.2	54.0	61.2	60.9	71.4	50.8
Greater Anglia	49.4	51.9	67.5	67.4	57.9	52.1	48.3	59.6	30.9	34.0	38.5
ScotRail	23.7	25.5	24.1	22.9	24.0	29.3	30.6	30.3	22.7	28.7	29.6
c2c	29.7	31.5	35.3	30.2	22.3	22.2	21.1	18.6	26.2	20.9	28.9
South Western Railway	15.4	23.5	24.6	17.6	22.2	20.4	23.1	21.4	19.1	24.3	23.7
Chiltern Railways	32.7	33.1	28.9	27.8	24.2	24.3	22.9	21.7	21.3	24.2	22.2
Southeastern	18.7	23.8	27.6	32.9	27.2	26.7	28.3	37.1	32.5	24.7	22.0
West Midlands Trains	33.4	35.2	39.4	33.9	31.4	31.0	38.5	28.2	20.7	21.2	19.0
Govia Thameslink Railway	21.7	31.6	32.1	29.3	16.2	19.2	16.3	12.8	20.0	20.2	12.8
Merseyrail	9.7	8.5	9.4	12.1	8.1	8.4	11.1	8.7	5.8	10.1	9.5
TfL Rail	2.8	2.2	3.6	2.9	1.7	1.6	3.1	3.9	2.4	2.6	2.9
London Overground	2.8	2.4	1.9	1.5	1.2	1.3	2.1	2.3	1.0	0.7	0.6

Source: ORR website

## List of Background Documents:

There are no background papers to this report.

## Required Considerations

### Equalities:

Age		No
Disability		No
Gender Reassignment		No
Pregnancy and Maternity		No
Race		No
Religion or Belief		No
Sex		No
Sexual Orientation		No

Consideration	Comment	Responsible Officer	Director
Equalities	A full impact assessment has not been carried out because the report is for noting.	David Hoggarth	David Hoggarth

### Environment and Sustainability

	No
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Consideration	Comment	Responsible Officer	Director
Sustainability / Environment – including considerations regarding Active Travel and Wellbeing	A full impact assessment has not been carried out because the report is for noting.	David Hoggarth	David Hoggarth

### Legal

	No
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Consideration	Comment	Responsible Officer	Director
Legal	There are no legal implications for Transport for the North	David Hoggarth	David Hoggarth



	- the rail franchise contract authority is the DfT.		
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### Finance

	No
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<b>Consideration</b>	<b>Comment</b>	<b>Responsible Officer</b>	<b>Director</b>
Finance	There are no financial implications for Transport for the North.	David Hoggarth	David Hoggarth

### Resource

	No
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<b>Consideration</b>	<b>Comment</b>	<b>Responsible Officer</b>	<b>Director</b>
Resource	There are no resource implications for Transport for the North .	David Hoggarth	David Hoggarth

### Risk

	No
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<b>Consideration</b>	<b>Comment</b>	<b>Responsible Officer</b>	<b>Director</b>
Risk	A risk assessment is not required.	David Hoggarth	David Hoggarth

### Consultation

	No
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<b>Consideration</b>	<b>Comment</b>	<b>Responsible Officer</b>	<b>Director</b>
Consultation	A consultation has not been carried out because the report is for noting and discussion.	David Hoggarth	David Hoggarth