

Revenue protection and counter fraud strategy 2022

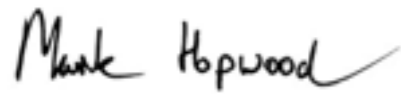


Foreword



“GWR believes in putting our customers first. That means protecting customers who pay their fares from those who deliberately do not. We will not tolerate fare evasion, we want our customers to travel with confidence, safe in the knowledge that our teams are working hard to prevent and detect ticketless travel and journey related fraud.

We have set out to be industry leaders in the identification and pursuit of systematic, prolific, and dishonest exploitation of our services. We recognise and accept that we have a responsibility to our customers and to taxpayers, who have supported the industry through a period of substantial change. We are determined to get this right. We believe it is key to protecting customers and helping to encourage a return to rail travel, and we welcome your support and your help as our teams put this Revenue Protection and Counter Fraud strategy into practice.”



Mark Hopwood CBE (MD)

Contents

1. Executive summary.....	Page 4
2. Performance history.....	Page 5
3. Background.....	Page 6
4. Loss measurement.....	Page 7
5. Strategic objectives:.....	Page 8
Appendix 1 Detailed strategic objectives	
Appendix 2 Revenue protection and anti-fraud governance structure	
Appendix 3 Revenue protection calendar of events	
Appendix 4 Revenue protection resources	
Appendix 5 Revenue protection organisational structure	

1. Executive summary

The creation of Great British Railways (GBR) who will receive all the fare revenue means that the British Taxpayer now holds the entire railway revenue risk. This strategy sets in motion our plan for an effective and proactive intelligence led revenue protection and counter fraud function that ensures that we will lead the way in reshaping the industry on these matters and satisfying government expectations by protecting both the ticket revenue generated and the interests of the business in the longer term.

Protecting revenue has always been a key activity for a train operating company and, as we prepare for substantial industry change, we know future contracts with government will ensure it continues to be a key objective. We will achieve this by ensuring that our staff use the appropriate tools for the situation, this includes dealing with revenue protection and fraud effectively, professionally, and safely. However, we do not want to unnecessarily subject anyone to revenue protection action.

Purchasing a rail ticket is becoming a far simpler task using modern technology. Therefore, we will provide customers with the access to the correct information, the facilities, and opportunities to purchase the most cost-effective tickets for their journey before they board our trains. As a function, we will also ensure that we keep up to date with retailing and fulfilment advancements through engagement with the GWR Retail Team.

We also recognise that there are some who will use our network to travel dishonestly. We will balance the need to serve our genuine and honest customers by prioritising collaboration internally and externally with industry stakeholders to identify and address system weaknesses within the retailing model to prevent and deter ticketless travel and fraud. The example must be set that those that seek to travel dishonestly are caught to deter this practise. We will deliver a dynamic and balanced approach to journey related fraud, whilst ensuring that those who dishonestly use our services are detected and held to account.

The purpose of this Strategy is to set out the GWR vision for the development of the Revenue Protection and Counter Fraud functions.

The aim of the strategy is:

- To set in place the strategic goals for the delivery of industry leading, high quality customer service through the professional activity of the functions that proactively tackle both ticketless travel and fraud that negatively impacts upon the business and our genuine customers.

There is little doubt that fare evasion and fraud is a significant risk across the industry. Yet due to its hidden nature, the true extent of the cost and impact is difficult to fully establish without introducing standardised activities and measurement exercises.

This strategy sets out our intention to drive the standardisation of revenue protection and counter fraud activities by implementing a “holistic” approach. The long-term objective is to reduce the cost of running the railway to the UK taxpayer through the development of a Counter Fraud Standard with the **strategic headings** of:

- Proactive mitigation
- Reactive investigation
- Governance reporting
- Raising awareness.

We will:

- Treat all our customers with respect and dignity.
- Embed this strategy across the business.
- Collaborate across the industry to provide a counter fraud balance in the design of new retail and compensatory schemes.
- Use data intelligently to identify and measure the extent and cost of ticketless travel and fraud.
- Identify and assess ticketless travel and fraud risks.
- Encourage rigorous and effective ticket checking.
- Make it harder for people to commit fare evasion and fraud.
- Reduce the loss cost from fare evasion and fraud.
- Proactively pursue the recovery of loss arising from fare evasion and fraud.
- Investigate referrals to the criminal and civil standard of proof.
- Publicise successful actions.

This strategy will **create an environment** where we are accountable to our customers by:

- Reducing the opportunity to commit offences
- Increasing the risk of getting caught
- Publicising the consequences of being caught.

2. Performance history

Over the past five years we have made sustained improvements in our revenue protection performance. Our revenue protection teams are more productive than ever, generating and protecting circa £100k of revenue per Revenue Protection Inspector / Ticket Examiner.

The Prosecutions Team have historically provided cost effective back-office support and the capability to prosecute offenders in the criminal courts.

Financial year	Prosecution team generated income	Comment
2016/17	£975k	Fully functional
2017/18	£1.06m	Fully functional
2018/19	£1.25m	Fully functional
2019/20	£1.68m	Fully functional
2020/21	£1.02m	COVID 19 & no events

3. Background

Figures released in October 2019 from the Crime Survey for England and Wales estimated that incidents of fraud for the 12 months period to June 2019 had increased 15%, with almost 3.9million reported offence. This makes fraud the most prevalent criminal offence in the United Kingdom.

For business, it is estimated that that the **average cost of fraud related activity is 8.58% of annual turnover.**

The rail industry has a natural propensity to assume that all its users are honest law-abiding citizens. However, this ignores long established concepts of human social science which suggests that humans behave in exact accordance with their own self-interest, and that people carry out dishonest acts where the benefits versus consequences calculation is favourable to them.

This area will be familiar to many at GWR because it is closely related to the psychology employed in Be Safe around risk taking and consequence.

However, whilst the rail industry knows that it has both honest and dishonest users of its services, it has never fully considered the impact of the dishonest element as a business cost.

It can be strongly argued that the industry has long been ignorant of the level and type of fraud being perpetrated against it. For example, despite knowing how many tickets that have been sold and the value of the income this has generated, train operating companies have no idea as to how many of those tickets represent the true nature of the journey taken or whether the "customer" was entitled to the discount they applied to their ticket at the point of purchase.

Fraudsters exploit system weaknesses for their personal gain and for as long as that weakness exists. Yet whilst the industry knows that dishonesty exists amongst our passengers, it has not significantly changed its approach to controlling the loss cost risk of ticketless travel and journey related fraud since the implementation of the Regulations of Railways Act in 1889.

Effective ticket verification is a key element in preventing dishonest refund and delay compensation claims. We will encourage a greater uptake and use of the technology available to colleagues for checking digital tickets. We also will develop a close and collaborative relationship with the Fraud Team at our First Contact Centre (FCC). We will collaborate with FCC to measure and identify, risks, trends, and offenders with the common goal of targeting high risk routes and individuals as part of an intelligence led revenue protection function to prevent this type of fraud, recover our loss cost, and hold offenders to account.

Like every organisation, there is also a significant insider threat which has never been considered as a loss cost to the business or industry.

There is no doubt that that dishonest passengers benefit from learned behaviour and will employ successful fare evasion techniques for their own financial benefit. **The persistent application of this type of behaviour takes this type of passenger away from traditional fare evasion offences and into the more serious Fraud Act 2006 offences.**

Under the Fraud Act 2006, fraud can be perpetrated in five clearly defined ways:

- By false representation
- By abuse of position
- By failure to disclose
- By the creation and possession of articles intended for use in fraud
- By obtaining services dishonestly.

This strategy outlines our intent to identify, measure, and mitigate both Journey Related and other fraud risks.

4. Loss measurement

The most recent estimate of the cost of ticket-based fraud to the rail industry in the UK is £210million per year. However, this is based on old data and traditional revenue protection detection rates. We believe that the current loss cost affecting the business and the wider industry is significantly higher.

The current "at risk" revenue loss cost to the business from ticketless travel is measured by focussing upon the proactive surveys, targeted station blocks, onboard interactions, and prosecutions outcome data. This is reported to the business at the Quarterly Board Review and Revenue Protection Steering Group meetings.

In our last BAU year (19/20) the average prosecutions outcomes were:

- £129,266 per period.

During the first year of the global pandemic where revenue protection activity did not restart until period 5, the average prosecution outcomes were:

- £78,656 per period.

We will use both traditional revenue protection, and bespoke counter fraud data analysis to identify the true extent of revenue at risk from ticketless travel and fraud.

The risk from systematic ticketless travel is especially high within regular travellers such as our commuter customers who are most affected by fare increases. As part of this strategy in February 2020 GWR Revenue Protection Inspectors began identifying fare evaders who were persistently exploiting existing system weaknesses in barcode tickets to travel on the railway.

This exercise has thus far identified that:

- 586 individuals have undertaken **15,270 fare evasion journeys**
- Total **loss in revenue £288,219**
- Under the traditional method of calculating loss GWR would have identified only 586 journeys and £29,638 in lost revenue

5. Strategic objectives

- Modernise the revenue protection function
- Introduce counter fraud policies and response plans
- Enhance our revenue protection activities at gate lines
- Increase effective ticket checking
- Create a rail centric counter fraud function
- Develop a rail centric counter fraud standard
- Establish new roles and responsibilities
- Establish a management framework
- Determine outcomes and metrics
- Loss recovery and prosecutions



Appendix 1: Detailed strategic objectives

Modernise the revenue protection function

Revenue protection in a SMART-enabled world

The planned increase in the use of SMART retailing across our network as well as the creation and connection of different account-based ticketing schemes will offer seamless retailing and travel to our customers. However, without careful consideration this can also create unintentional journey related fraud risks. Therefore, our revenue protection and Counter Fraud function must flex and evolve at a similar pace if we are to protect the taxpayer's investment in the rail industry and ensure that our genuine and honest customers receive the quality of service they are paying for.

We will employ fraud management and investigation professionals to work in collaboration with our revenue protection teams and other internal functions, and who will be responsible for ensuring that the business is kept aware of and considers both current and emerging fraud risks within retailing, card not present and SMART technology and other areas of the business when designing and implementing new digital schemes.

The Fraud Managers will also have the responsibility in the management of investigations and the pursuit of loss cost recovery through both the criminal and civil legal processes.

Develop and train counter fraud investigators

We will engage with the Institute for Apprenticeships & Technical Education and develop the internal capability within our revenue protection and wider colleague base by placing them on a Counter Fraud Investigator Apprenticeship scheme to create a new role of Revenue Investigator (RI). This will enable the professional investigation of small non-complex criminal investigations and a range of civil investigations. RI's can also act as case officer within a larger investigation team, as required, carrying out parts of a more complex investigation as directed by a Fraud Manager.

It will be the RI's responsibility to proactively investigate allegations of fraud and make effective, autonomous operational decisions from referral to conclusion to drive their investigations. Conclusions could mean support of a successful prosecution, levy of penalty (or equivalent) or no further action.

The professional investigation of fraud will enhance our ability to work collaboratively with the Police and increase the chance of Police uptake when making fraud referrals, as well as providing us with the opportunity to pursue private prosecutions where appropriate.

Proactive detection activity

We will use data more effectively to produce an intelligence led function where Revenue Protection and Counter Fraud activities to detect ticketless travel, systematic fare evasion and fraud in high-risk areas where little or nothing is currently known.

Proactive detection activity can include physical deployment, fraud measurement and assurance activity, or the use of data sharing and/or data analytics to attempt to find journey related fraud risk in a specific area.

Enhance revenue protection activities at gate lines

Our gateline colleagues are our customers first contact with the business and are therefore our first line ambassadors. However, the purpose of a gate at a station is to operate as an automated turnstile which checks the validity of a ticket to allow entry and egress to a

station to only customers who hold valid tickets. Therefore, our gateline colleagues are also our first and last revenue protection defence. We will emphasise the importance of revenue protection at our gates through bespoke and targeted gateline activities.

With digital ticket sales significantly increasing and a determined industry drive towards 100% digital retailing, our gateline colleagues have a difficult job to do when it comes to simultaneously ensuring the safety of customers and colleagues, providing high standards of customer service, and protecting the revenue. This is not helped by aging and slow to react validation technology. Therefore, we will also actively seek to develop and enhance the technology which will allow reliable automated and remote ticket validation at our gates.

Increase effective ticket checking

The physical act of checking tickets both on trains and at gates is essential in the protection of revenue and the identification of both offenders and trends. We will ensure that both onboard and station colleagues play their part in protecting the revenue using technology and more effective ticket checking by all grades of staff.

Fraud awareness material

We will ensure that staff have access to ticketless travel and fraud awareness material as appropriate to their role. The Head of Revenue Protection Development should be responsible for the decision on what material is appropriate and for the provision of that material.

Create a rail-centric Counter Fraud function

- Building and evolving revenue protection and fraud investigation and management capability
- Innovating in intelligence sharing and the proactive use of data
- Increasing the understanding of both journey related and internal fraud risk and threat, and using this to design out opportunities for ticketless travel and fraud where possible
- Ensuring close working on shared threats and opportunities across functions
- Minimising loss in the areas where there is known risk.

Fraud risk assessments

This function would undertake varying levels of risk assessments including:

- A high-level fraud risk assessment that gives an overview of the main risks and challenges facing the organisation
- An intermediate fraud risk assessment that extends to departmental functions, programmes, or major areas of spend and functions
- A detailed fraud risk assessment that covers individual projects and programmes.

Fraud risk assessments would be the ongoing responsibility of the counter fraud function.

Reporting routes

Establishing counter-fraud reporting routes for staff, contractors, and customers to report suspicions of fraud and a mechanism for recording these referrals and allegations. Reporting routes will be published and promoted. The Counter Fraud function will monitor the usage of these reporting routes and consider whether they are effective.

We will develop a mechanism or system for recording all reported potential instances of fraud. Reports will be recorded so the specifics of the allegations are clearly identified,

including any individuals and/or organisations involved and the act(s) they are alleged to have undertaken.

Loss reporting

The development of a method of reporting identified the loss cost of fraud, alongside associated recoveries and prevented losses, to the executive. However, the frequency of reporting may change depending on the need to conduct detailed fraud reviews.

Develop a rail-centric Counter Fraud standard

A rail-centric Counter Fraud standard would provide direction and guidance for:

- Senior leaders, executive directors, officers of government departments and third party stakeholders
- Counter Fraud leads within organisations who manage fraud risk
- Members of audit and risk committees
- Audit and assurance bodies
- Employees and contractors within organisations

Whilst the standard would apply to GWR it could equally applied to all train operators, industry governance bodies, government departments and arms-length bodies, third providers of services goods, third party retail and compensation providers.

Within a Counter Fraud standard those responsible for countering fraud would ensure:

- Accountabilities and responsibilities for managing fraud risk are defined across the organisation
- Staff have the skills, awareness, and capability to protect the organisation against fraud
- Controls are in place to mitigate fraud risks and are regularly reviewed to meet evolving threats
- Fraud risk management practices, tools and methods continue to evolve in line with industry trends, threats, and best practice
- Organisational codes of conduct and ethics, and those of associated professions are upheld.

Establish a management framework

Establish a method of authorising, directing, empowering, and overseeing revenue protection and counter fraud activity within a governance framework.

The governance and management framework should include, but not be limited to:

- Procedures and processes for taking decisions, and the degree of autonomy
- Requirements for fraud risk reporting, and incident management
- The arrangements for obtaining organisational assurance.

Determine outcomes and metrics

Defining outcomes, we are seeking to achieve with metrics to measure whether the targeted outcome has been achieved. Metrics with a financial impact should be based on a targeted value of prevented and/or detected fraud against a baseline to measure improvement over time.

Create revenue protection and counter fraud policies and response plans

We will create a counter fraud policy, and a response plan for dealing with potential instances of fraud. A Counter Fraud policy will set out:

- The standards of expected behaviour.
- How fraud is defined in the organisation with reference to current legislation.
- How the organisation deals with fraud including activity to find fraud.
- The organisation's approach to fraud risk assessment.
- Who is responsible within the organisation for countering fraud.
- How the business will continue to improve based upon lessons learnt.

The response plan will include:

- Where individuals can report potential instances of fraud.
- How the organisation deals with individual items of intelligence.
- How the organisation responds to instances of fraud.
- How the organisation monitors the progress of any investigations, and takes decisions on them.
- The roles and responsibilities of staff, teams, and individual functions in responding to instances of fraud.
- How this information will be reported both within the organisation, and to other relevant organisations (including law enforcement agencies).

Establish roles and responsibilities

Roles and responsibilities for countering fraud shall be defined. This includes, but is not limited to, the person to whom each role is accountable to, what activities, outputs, or outcomes they are responsible for. Roles may be allocated to more than one individual and be supported by a team of specialists as appropriate, so long as the accountability is clear.

We will develop a Revenue Protection and Counter Fraud Function which will have trained and experienced revenue protection staff as well as Fraud Managers and Investigators who can conduct thorough and sound investigations into allegations of fraud, and who will be responsible for conducting exploratory and proactive fraud detection activity and presenting mitigation recommendations to the business.

The Head of Revenue Protection Development will be accountable for the day-to-day management of fraud within the business and will provide effective leadership at an organisational level to ensure the organisation is managing the risk of fraud.

The Head of Revenue Protection Development will:

- Work with the business to meet this functional standard, keep senior leaders and the executive aware of where there are gaps.
- Be accountable for the performance in countering fraud and the development of the revenue protection function.
- Ensure the business has the resources, skills, and capability to deliver the Revenue Protection and Counter Fraud Strategy.

The responsibility for countering fraud may be split between different individuals who hold responsibility for specific areas of the business, and this accountability should be recorded and recognised by the board.

The Head of Revenue Protection Development will also champion counter fraud. In discharging this responsibility, they will:

- Promote awareness of fraud and fare evasion across the business
- Understand the threat posed from fraud and fare evasion
- Understand best practice on countering fraud and fare evasion
- Understand cross industry fraud, fare evasion initiatives, and engage the business in those initiatives.

Loss recovery and prosecutions:

Our Prosecutions team are responsible for receiving and entering all revenue protection items and fraud referrals onto the case management system. The timely receipt and entry of this data will allow us to endeavour to recover most revenue loss in out of court settlements.

However, we are prepared to pursue all fare evasion and fraud through Her Majesty's Court and Tribunals (HMCTS), which could include criminal prosecution as well as civil recovery processes.

Appendix 2: Revenue protection and anti-fraud governance structure

Revenue Protection Steering Group

Chair	Head of On Board
Core Attendees	Head of On Board Head of Stations Head of Retail Head of Revenue Management Head of Revenue Protection Development Retail Operations Manager Revenue Protection Data Standards Manager Regional Revenue Protection Managers
Frequency	4 weekly

Head of On Board Team Meeting

Chair	Head of On Board
Core Attendees	Head of On Board Head of Revenue Protection Development Catering Strategy Planning & Development Manager Regional On Train Manager (East) Regional On Train Manager (Central) Regional On Train Manager (West) Workforce Planning Manager Assistant to Head of On Board
Frequency	4 weekly

Revenue Protection Improvement Group

Chair	Head of Revenue Protection Development
Core Attendees	Revenue Protection Prosecutions Development and Fraud Manager Revenue Protection Data Standards Manager Regional Revenue Protection Managers
Frequency	2 weekly

Appendix 3: Revenue protection calendar of events

Central Region:

Tuesday – Friday	x	Cheltenham races
Saturday	x	BTM Evening Block
Saturday & Sunday	x	Love saves the day Festival Bristol
Week	x	Glastonbury at Castle Cary
Saturday & Sunday	x	Weston Airshow at Weston Super Mare
Saturday	x	St Pauls Carnival Bristol
Tuesday to Saturday	x	Nass festival at Castle Cary
Saturday	x	Gay Pride Bristol
Saturday	x	Gay Pride Weston Super Mare
Saturday & Sunday	x	Vibe Festival Castle Cary
Saturday & Sunday	x	Tokyo World Music Bristol
Saturday & Sunday	x	West Feat- Dance Castle Cary
Saturday	x	Bridgwater Carnival
Friday	x	Weston Super Mare Carnival

East Region:

Wednesday to Sunday	x	Henley Regatta
Wednesday to Monday	x	Reading Festival

West Region:

Saturday	x	Newton Abbot races (Devon)
Saturday	x	Trevithick Day (Cornwall)
Friday to Monday	x	Ocean City Sounds Plymouth (TBC)
Saturday & Sunday	x	Torbay Air show (Devon)
Friday to Sunday	x	St Ives Food and Drink Festival (Cornwall)
Sunday	x	Lost Fest (Cornwall)
Friday to Sunday	x	Falmouth Classics (Cornwall)
Friday	x	Newton Abbot races 1700 first race (Devon)
Saturday	x	Lets Rock (Devon)
Saturday & Sunday	x	Mazey Day (Cornwall)
Friday	x	Newton Abbot races (Devon)
Saturday	x	Teignmouth Air show (Devon)
Tuesday	x	Michael Bubl� (Powderham) (Devon)
Monday to Monday	x	Boardmasters (Cornwall + Devon)
Wednesday	x	Falmouth Red Arrows (Cornwall)
Saturday to Friday	x	Dawlish Carnival (carnival night tbc) (Devon)
Saturday	x	Newton Abbot races (Devon)
Saturday	x	Cornwall Pride (NQY) (Cornwall)
Friday	x	Newton Abbot races (Devon)

Appendix 4: Revenue protection resources

Central Region

It has been identified that more Revenue Protection coverage is required on Taunton to the West, Taunton to West Super Mare and Westbury to Portsmouth Harbour line, and that by having Revenue Protection Inspectors (RPI's) based at Taunton we will be better able to cover a greater area of the network.

Taunton is also ideally located to facilitate better cross region working between the Revenue Protection Teams in the Central and West Region during the busy summer months. RPI's based in Taunton will be able to work key fare evaded lines, such as the Taunton to Weston Super Mare and Westbury to Weymouth, Westbury to Portsmouth Harbour and Brighton lines with minimal travelling times.

Therefore, we intend to increase the number of Revenue Protection Inspector positions within the Central revenue protection team, based at Taunton Station. This will comprise of 6 full time roles.

West Region

The West Revenue Protection team have put together business cases for 3 more RPIs (Revenue Protection Inspector) and 6 more TEs (Ticket Examiner) based at Exeter St David's. The RPIs would bolster a very successful team and would enable us to cover whole days instead of just mornings or afternoons as it is now. Whilst the new Tes would enable us to cover trialled diagrams and cover a shortfall of revenue that is currently walking of the trains.

Both grades would help stop the growing trend of passengers only paying when challenged or refunding unchecked ticket. The latter is being made much easier by updated mobile apps and e-tickets.

In the West we have received numerous complaints from customers that their tickets aren't being checked. Our honest passengers are noticing that those who would evade paying fares can do it regularly. This is damaging our reputation and the experience with our genuine honest customers. More colleagues on board trains would help us improve our reputation and enhance the customer experience.

East Region

The introduction of MTR Elizabeth Line services in the Paddington to Reading Corridor has allowed our East Region Revenue Protection Team (East Region) to re-focus its revenue protection priorities. Many services and station locations that were previously the focus of GWR Revenue Protection activities now rarely served by GWR. This allows us to now concentrate and priorities our efforts upon other routes.

The refocussing of the East Regions work will create an intelligence led structure that supports and empowers our Ticket Examiners and Revenue Protection Inspectors to ensure that repeated fare evasion on the GWR network is being addressed.

The East Region will now focus upon:

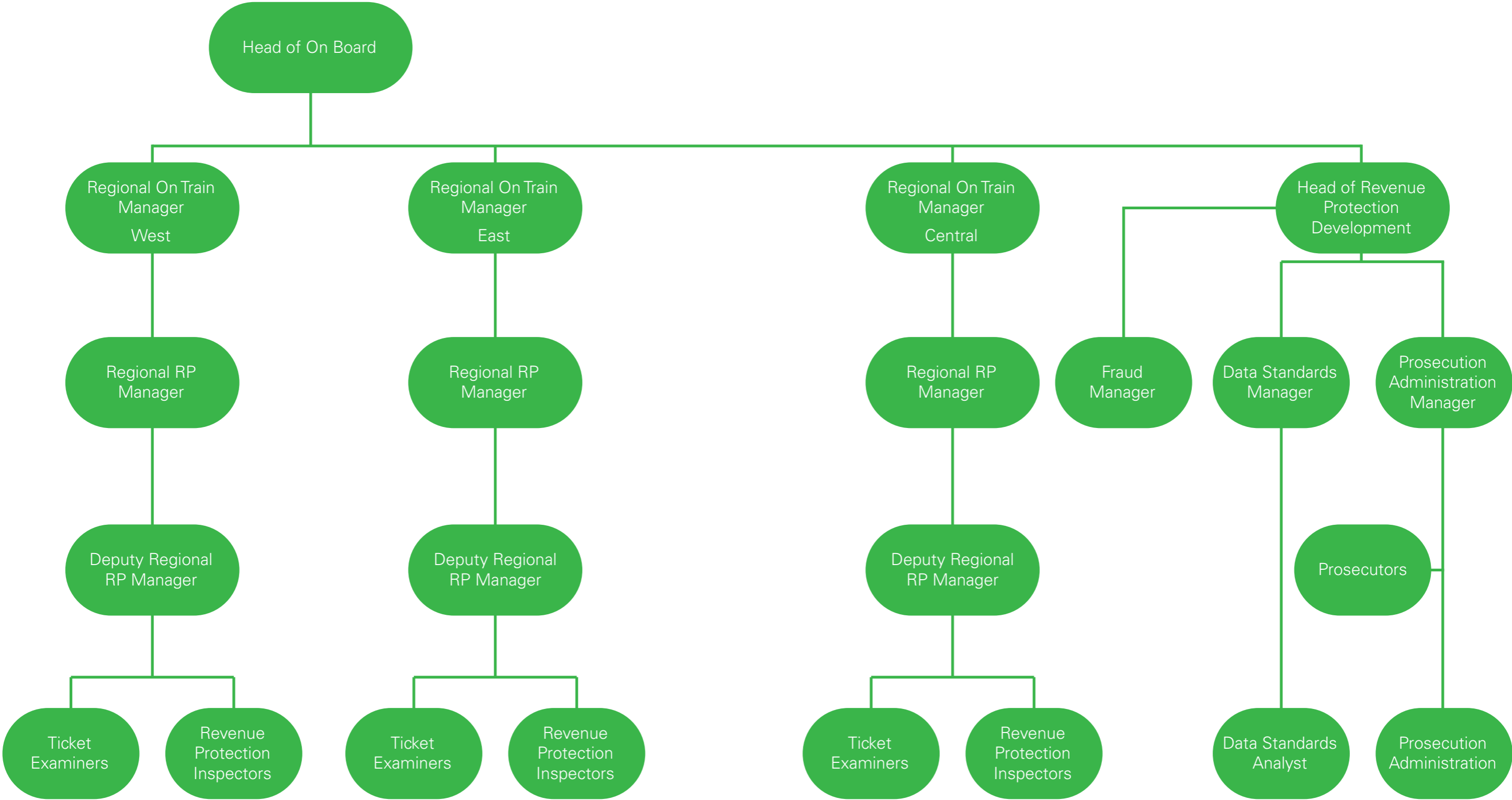
- High Speed Services and other lines that serve GWR services e.g., Newbury line and surrounding stations.
- Contactless Payment (CPAY) ticketing options now available in the Reading to Paddington corridor on both MTREL and GWR services. Our revenue protection colleagues are the only ones issued with TfL (Transport for London) Revenue Protection Inspection Devices (RIDs) which are used to ensure that contactless cards are valid on the GWR network.
- Joint working with the Guards function regarding fare evasion using CPAY on GWR services, with the aim of implementing targeted revenue protection exercises.
- Encouraging and developing joint operations with Southwest Railway, West Midlands Railway, Southern Railway, Chiltern Railway and MTR Elizabeth Line to ensure the correct approach is taken with the travelling public.
- Encouraging, developing and support our Ticket Examiners ability to deal with individuals without a valid ticket for their journey and in the issuing of Penalty Fares, Unpaid Fare Notices and Ticket Irregularity Reports through revenue protection training and the local Line management team.
- Large scale blocks across the region at key locations such as Reading, Paddington, Oxford, thereby raising the awareness amongst our customers and colleagues that we take ticketless travel seriously.
- Fare evasion "hot spots" within the East Region, with the aim of targeting sustained and repetitive fare evasion on the GWR network.

Station Based Revenue Protection

The primary purpose of a gate at a station is to operate as an automated turnstile which checks the validity of a ticket at the point of entry and egress. Like airline gates and leisure events, people who do not hold valid tickets should not pass through. Therefore, the gate is undeniably a revenue protection tool and a cost to the business.

We will improve our revenue protection resources at all gate lines across the business. Through the improvement of technology and improving colleague awareness of the importance of revenue protection at our gates.

Appendix 5: Revenue protection organisational structure



GWR