

Stephanie Tobyn
Director of Strategy, Policy and Reform



Tricia Williams
Managing Director
Northern Trains
By email only

3 October 2025

Dear Tricia,

Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory Provisions: Passenger

In July 2024, we set out our concerns about the reliability of Northern Trains' delivery of passenger assistance for disabled people. We requested an improvement plan in September 2024 and in [July 2025](#) we acknowledged the progress you had made in implementing actions designed to deliver an improved service for disabled people.

Staff training is central to the safe, reliable and effective delivery of assistance to passengers and your improvement plan included delivery of some staff training, for example refresher disability awareness training for conductors. However, it was only in August 2025 that our new reporting requirements revealed that almost 800 Northern station and revenue protection staff have not received disability awareness training. Disability awareness training for passenger-facing staff, with defined outcomes, has been a requirement of our ATP guidance since 2021.

I am very concerned about the impact this lack of training may have had on the experiences of your passengers, and also that Northern has not made us aware of this compliance issue before.

Accessible Travel Policy (ATP) requirements and monitoring

All train and station operators must establish and comply with an ATP as a condition of their licence, setting out their provision for disabled passengers.

[ORR's ATP Guidance](#) (section B6) required operators to commit to delivering disability awareness training to all existing passenger-facing staff by 31 July 2021, so as to ensure that staff were able to meet the training outcomes set out in our guidance (annex D). We agreed an extension to this requirement for Northern from July to December 2021. From 31 July 2021, our ATP Guidance requires all new

passenger-facing staff to receive disability awareness induction training, with refresher training delivered to all every 2 years.

We introduced a new approach to monitoring compliance with the training requirements in April 2025, with all operators reporting key metrics to us every quarter. We received Northern's first submission in August 2025, which reported that Northern had 791 station and revenue protection staff that had not received disability awareness training, around a third of the station staff to whom the training requirements apply.

Northern has stated that it was our new reporting requirement that drew their attention to this issue, and that it has likely arisen because of the lack of rostered time for training release or formal agreements with station staff that support use of eLearning.

Next steps

On 4 September 2025 we asked you to explain how you intended to ensure that all relevant staff receive appropriate training and you responded on 19 September 2025. You gave a very high-level outline of an intention to start by delivering in-person training sessions during October for station staff, with an intention to move to mandatory e-learning subject to the outcome of ongoing pay talks and union engagement. You planned to provide e-learning for revenue protection staff. On our further request you also provided the material that will be used to deliver the training.

The level of information that you provided is not sufficient to provide us with confidence about the pace or quality of training provision, or that it will result in staff able to demonstrate the required training outcomes.

We now request a full plan, setting out how you will ensure that station staff are able to meet the training outcomes set out in our ATP guidance. Your plan should, as a minimum, address the points set out in the Annex. It should be submitted to ATP@orr.gov.uk by **Wednesday 15 October 2025**.

Failure to provide or deliver the plan will result in us initiating enforcement action in line with our [Economic Enforcement Policy](#).

I am copying this letter to Gary Bogan, Rail North Partnership.

Yours sincerely

Stephanie Tobyn

Annex A: Guidance on plan

The plan should, as a minimum, cover these points.

Description of the issue

1. Total number of passenger-facing staff who should receive disability awareness training.
2. Number of passenger-facing staff who have not received training designed to enable them to demonstrate the full range of mandatory training outcomes set out in Appendix D of the ATP Guidance.
3. Number of passenger-facing staff who have not received training designed to enable them to demonstrate mandatory training outcome 9: providing safe assistance (which includes ramp deployment).
4. Identification of the mandatory training outcomes on which staff need to receive training. The ATP Guidance states that operators are not obliged to give equal time and weight to each of the mandatory outcomes, and that training for existing staff may take into account factors such as the scope and content of previous training packages, staff responsibilities, and existing training commitments.

Action plan

1. A list of the mandatory training outcomes annotated with the sections of training that are intended to address them.
2. A detailed description of how training is to be delivered including, for example, which content is to be delivered through face-to-face training sessions or e-learning, and who will deliver face-to-face training.
3. A description of how disabled people have been involved in the development of course content and material, and how staff will hear from disabled people about their lived experience of using the railway.
4. Copies of all training material being used to now resolve this matter.
5. A trajectory showing, week by week, the number of staff to receive training.
6. Dates and locations of planned training activities. ORR staff will arrange to attend selected sessions and observe how it is conducted.
7. A description of how Northern will assure itself that staff, having completed the training, will be able to demonstrate the mandatory training outcomes.