

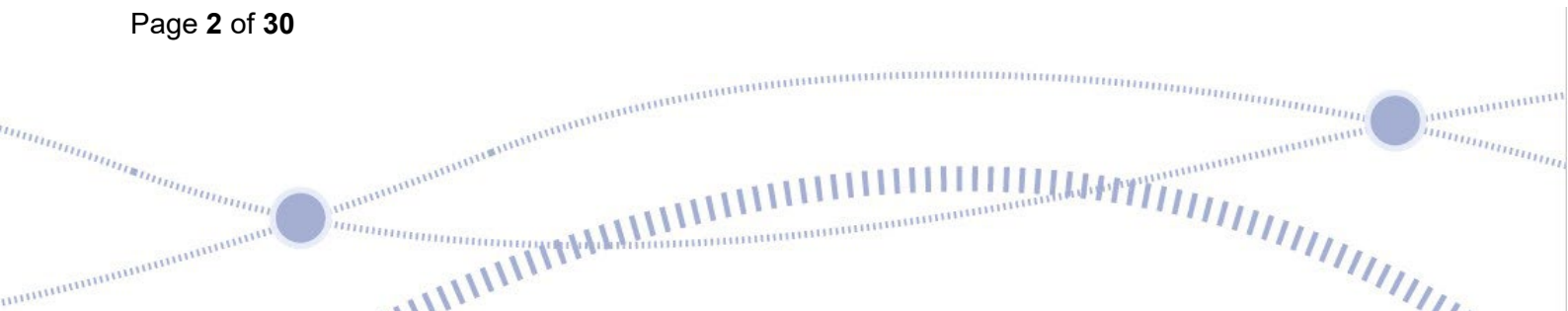
Northern Trains Limited: Investigation report

3 March 2026



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Executive summary

On 4 December 2025, ORR opened a formal licence investigation into Northern Trains Limited (Northern) to establish if it had contravened or was contravening Condition 5 (Accessible Travel Policy) of its GB Statement of National Regulatory Provisions (SNRP): Passenger and Station Licence. Northern has engaged constructively throughout our investigation.

Condition 5 in both the GB SNRP: Passenger and Station Licences states: The holder shall establish and thereafter comply with an Accessible Travel Policy (ATP). ATPs set out how operators will protect the interests of disabled users of their trains and stations, and cover areas such as provision of assistance, staff training and passenger information. Operators must secure ORR's approval for their ATPs and comply with the commitments they make.

In 2024, Northern agreed a passenger assistance improvement plan with ORR designed to tackle poor performance in delivering reliable assistance as identified through ORR's Experiences of Passenger Assist survey. Northern made good progress in delivering the actions it set out in its plan and we [wrote to Northern](#) in July 2025 confirming that, over the year ahead, our focus would shift to monitoring the realisation of benefits for passengers.

However, in August 2025 new reporting requirements for all operators revealed that around 800 Northern passenger facing staff had not received disability awareness training. This gap had not been identified or addressed in the passenger assistance improvement plan. Northern took action to deliver training to station staff and, on 4 November 2025, reported that it had fulfilled the plan.

Notwithstanding the delivery of training in October 2025, given the range of issues raised previously, we continued to have concerns about Northern's historic and ongoing compliance. The licence investigation that we opened in December 2025 focused on commitments that Northern makes in its Accessible Travel Policy relating to disability awareness training and included:

- The timeframe over which staff who had not received required training were interacting with disabled passengers, and the scale and impact of the issue;
- The circumstances that led to staff not receiving training when required and how the issue remained unresolved and unreported during this timeframe;
- How Northern can assure itself, its passengers and ORR that:

- i) The recent training has been effective and is enabling staff to meet the required training outcomes, and
- ii) A similar situation will not arise in future.

The main sources of information have come from Northern itself, including a response on 17 December 2025 to questions issued as part of the investigation, and a response on 4 February 2026 to our Case to Answer letter.

Summary of findings

Northern has been developing disability awareness training plans and materials for its staff since 2021, when its ATP was established. Northern has stated that both induction and refresher training have been delivered to conductors. However, induction training for new station staff has only been provided since late 2023 and the evidence indicates that most station staff did not have access to disability awareness refresher training until 2025.

Staff at Northern's ten busiest stations received training that addressed some of the mandatory training outcomes in 2025, as part of Northern's passenger assistance improvement plan, and disability awareness refresher training was delivered to station staff across Northern's network in October 2025. A gap remains for some staff with respect to one of the mandatory training outcomes (outcome 9), which Northern aims to resolve by July 2026.

Disability awareness training is intended to equip staff with the tools to better understand the needs of disabled passengers and how these can best be met to support their journeys on the rail network. Northern has acknowledged the impact on disabled passengers caused by the gap in training provision.

Northern's own internal audit, conducted in December 2025, identified a number of systemic issues relating to governance processes, monitoring and controls as key issues that led to the failure to deliver training to staff. Northern did not make ORR aware of gaps in provision of disability awareness training until it reported data under new reporting requirements in August 2025.

The training undertaken by Northern in October 2025 went a significant way towards closing the training gap for station staff. However, until systemic issues are addressed there is a risk that similar issues with disability awareness training could re-occur.

Northern has set out actions that it plans to take aimed at resolving systemic issues. These are tailored to address the issues identified in Northern's internal audit with some actions already complete and most to be completed by end March 2026.

1. Investigation background

Introduction

- 1.1. ORR holds operators to account against the commitments they make in their Accessible Travel Policies (ATPs), which cover areas such as provision of assistance, staff training and passenger information.
- 1.2. To inform our engagement with operators, we have been surveying passengers on their experiences of booked assistance on an ongoing basis since 2017, and [publish findings](#) annually.
- 1.3. Northern was the poorest performer in our survey from 2020-2024 for the reliability of assistance. At our request, Northern carried out an assessment of the gaps in the passenger assistance service and proposed a passenger assistance improvement plan. Staff training is central to the safe, reliable and effective delivery of assistance to passengers, and the improvement plan included delivery of some staff training, for example refresher disability awareness training for conductors.
- 1.4. In December 2024, we confirmed that ORR would hold Northern accountable for the delivery of its passenger assistance improvement plan. Northern made good progress implementing the actions in its plan, and we [wrote to Northern](#) in July 2025 confirming that, over the year ahead, our focus would shift to monitoring the realisation of benefits for passengers.
- 1.5. However, in August 2025 our new reporting requirements for all operators revealed that around 800 Northern passenger facing staff, consisting of station-based staff and revenue protection officers, had not received disability awareness training. This gap had not been identified or addressed in the passenger assistance improvement plan.
- 1.6. Our new reporting requirements involve quarterly submissions from all operators on the numbers of staff who have not received required disability awareness training. The reporting replaces previous biannual engagement with operators on compliance with disability awareness training requirements and better reflects that this is now a rolling business-as-usual activity for operators.
- 1.7. In September 2025 we asked Northern to explain how it intended to ensure that all relevant staff receive appropriate training. The level of information provided in the

response was not sufficient to provide us with confidence about the pace or quality of training provision, or that it would result in staff able to demonstrate the mandatory training outcomes.

1.8. In October 2025, we requested a full plan, setting out how Northern would ensure that station staff are able to meet the mandatory training outcomes set out in our ATP guidance. The plan that Northern submitted was ambitious and aimed to deliver training to all staff who required it over a 4-week period and be completed by 31 October 2025. On 4 November 2025, Northern reported that it had fulfilled the plan.

1.9. This action by Northern was a rapid response that aimed to ensure that all station staff had received disability awareness training. However, we had outstanding questions and concerns, in particular around whether Northern had taken the steps necessary to gain assurance that the plan had delivered the intended outcomes and to prevent a similar situation from arising again. As a result, we decided to open a formal licence investigation.

ORR Investigation overview

1.10. On 4 December 2025, ORR opened a formal licence investigation into Northern to establish if it had contravened or was contravening condition 5 (Accessible Travel Policy) of its GB Statement of National Regulatory Provisions (SNRP): Passenger and Station licence.

1.11. The scope of the investigation focused on commitments that Northern makes in its Accessible Travel Policy relating to disability awareness training and included:

- The timeframe over which staff who had not received required training were interacting with disabled passengers, and the scale and impact of the issue;
- The circumstances that led to staff not receiving training when required and how the issue remained unresolved and unreported during this timeframe;
- How Northern can assure itself, its passengers and ORR that:
 - i) The recent training has been effective and is enabling staff to meet the required training outcomes, and
 - ii) A similar situation will not arise in future.

- 1.12. The main sources of information have come from Northern itself, following the data submission on 12 August 2025. They include information shared with ORR on 4 September 2025 and 15 October 2025 as part of our early compliance engagement, a response on 17 December 2025 to questions issued as part of the investigation, and a response on 4 February 2026 to our Case to Answer letter.
- 1.13. We have also considered information and data relating to Northern and other operators as part of our business as usual (BAU) regulatory activities, including our passenger assistance satisfaction surveys and passenger complaints.

Condition 5 of Northern’s licences

- 1.14. Condition 5: Accessible Travel Policy in the GB SNRP: Passenger states:
- “The SNRP holder shall establish and thereafter comply with:*
- (a) a statement of policy; and*
- (b) a detailed body of arrangements, procedures, services and other benefits to be implemented or provided by the SNRP holder,*
- designed to protect the interests of people who are disabled in their use of trains operated by the SNRP holder and to facilitate such use (together the “ATP”).”*
- 1.15. The full text of the Condition is set out in the [model passenger licence](#).
- 1.16. Condition 5 of the Station Licence is identical except it refers to stations rather than trains.
- 1.17. Operators can only establish, or make material changes to, their ATP with approval from ORR.
- 1.18. Each operator is held to account against the commitments they make in their approved ATP.

Conduct of the investigation

- 1.19. The terms of reference of this investigation as set out in our initiation letter of 4 December 2025 issued to Northern is provided in Annex A.
- 1.20. This investigation has been carried out in line with our [Economic Enforcement Policy](#).

2. Accessible Travel Policy (ATP)

Introduction

2.1. ORR has published detailed [guidance](#) for train and station operators setting out the criteria that ORR will normally adopt in approving each operator's Accessible Travel Policy. That guidance sets out expectations relating to the provision of disability awareness training for passenger-facing staff (section B6) and defines mandatory training outcomes. It also sets out expectations relating to strategy and management (sections B1, B2 and B3). The commitments made in [Northern's ATP](#) are consistent with the expectations set out in the ATP guidance.

Disability awareness training

Baseline training for existing staff in 2021

2.2. Northern's ATP, as approved by ORR on 25 February 2021, committed to deliver disability awareness training to existing passenger facing staff by 31 December 2021, covering the mandatory training outcomes. This date was an extension to the original date of 31 July 2021 that is set out in our ATP guidance. This extension was to facilitate Northern introducing a three-hour briefing window for disability awareness training delivery.

2.3. In 2022, through the ATP annual review process, Northern amended its ATP to remove the now historic reference to the 31 December 2021 commitment.

Induction training for new staff

2.4. Northern's ATP maintains commitments that:

- *"All new staff will receive disability awareness training as part of their corporate induction"* (Northern ATP, page 30).
- *"The Office for Rail and Road (sic) have set out in their guidance nine mandatory training outcomes... which our training includes"* (Northern ATP, page 30).

Refresher training

2.5. Northern's ATP maintains a commitment that:

- *“All Northern staff will receive refresher training within two years of the initial training they have received, and as a minimum every two years thereafter; in order to ensure the mandatory training outcomes are maintained”* (Northern ATP, page 32).

Strategy and Management

2.6. Northern’s ATP maintains a commitment that Northern will:

- *“Embed the provision of services to disabled people within our business and our project planning*
- *Will continue to improve access to the railways for disabled people and those with reduced mobility*
- *Ensure our staff have the resources, skills and confidence to deliver assistance to customers*
- *Measure the success of our Accessible Travel Policies”* (Northern ATP, pages 23-24).

2.7. With respect to monitoring and evaluation, Northern’s ATP maintains a commitment that:

- *“We will regularly review this policy and a report on findings will be sent to the DfT and the ORR. This will include details of the achievements of objectives, new initiatives to improve our service to disabled customers and any difficulties we have encountered with the implementation of this policy.”* (Northern ATP, page 25).

3. Timeframe, scale and impact

3.1. ORR published ATP guidance, setting out new requirements relating to disability awareness training in July 2019 and initiated engagement with operators on their ATP commitments and training plans. A timeline, noting key events and engagements with Northern since 2019, is set out in Annex B. Information gathered through these various engagements has provided the evidence base for this chapter.

Timeframe and scale

3.2. We sought to establish the timeframe over which passenger-facing staff have not received the disability awareness training that Northern commits to provide in its ATP and the scale of the issue.

3.3. Northern provided some narrative alongside the data it submitted to ORR on 12 August 2025, stating:

- *“We have been delivering DA training on induction for station staff since late 2023. Before then the planned national stations reform work... was planned to pick up the full training requirement for all station-based staff. The cancellation of that work resulted in us moving to training new starters on induction as for other grades, but we have a backlog of longer serving station colleagues who don't currently have agreements in place for biannual safety brief days like conductors, and who we don't therefore have opportunities with off-roster time when we can deliver refresher training.”*
- *“100% of our Conductors are trained in line with the requirements as we have delivered DA training at induction since 2017 and we also have their 6 monthly safety brief we refresh training each time.”*

3.4. This narrative suggests that the training gap lies with station staff, not conductors. Specifically, it suggests that induction training was not available for new station staff between 2021 and late 2023 and that longer serving station staff had potentially not been offered refresher training at all.

3.5. In its response dated 19 September 2025 to ORR's initial questions on the matter, Northern provided a brief timeline. The key points were:

- *“2021/22: DA training was integrated into Northern’s Annual Business Plan. The plan would ensure all new station staff received DA training at induction, as per the already established process for Conductors, and a dedicated management training day was also to be delivered via Enhance the UK. A refresher training plan for station colleagues was drafted but not implemented.*
- *2022: The national Station Reform programme was launched.... This would have ensured full coverage of training for Station colleagues and would also have embedded future training requirements for refresher training.*
- *Mid-2022: Due to the scale of reform, negotiations around eLearning and training paused. The backlog of station colleagues without DA training was acknowledged as a temporary issue, with resolution expected post-reform.*
- *Autumn 2023: The Station Reform programme was discontinued nationally, removing the planned solution for DA training coverage.*
- *2023/24: Northern developed a new 5-module DA eLearning package in collaboration with Enhance the UK for Station and Conductor colleagues to facilitate the required refresher training. Modules 1–4 were immediately adopted for Conductor refresher training as part of their biannual safety brief days in 2023.”*

3.6. With respect to conductors, in its response of 17 December 2025 Northern additionally stated that:

- *“Conductors at Northern are trained and assessed as competent on entry, placed into an ongoing competency cycle designed to maintain that competence, and supported by safety briefs that reinforce and enhance existing capability for Disability Awareness training.”*

3.7. Northern’s timeline suggests that in the period 2021-2024 Northern developed training plans and materials for its staff and that, consistent with the information provided in August 2025, training was delivered to conductors, but that station staff did not receive refresher training (as above, induction training was available to station staff from late 2023). It appears that the issues Northern cites, relating to rostered time off for training, access to e-learning for station staff, and discontinued

plans for the Station Reform programme may apply to all station staff - and therefore most station staff appear not to have had access to disability awareness refresher training over the period 2021 to 2024.

- 3.8. During 2025, as one of the actions in its improvement plan for increasing the reliability of assistance, Northern delivered a 2-hour training session to 99 staff across its ten largest stations. The session covered Handover Protocol (the process of staff communicating between boarding and alighting stations to ensure passenger assistance is delivered), assistance best practice and communication skills.
- 3.9. On 12 August 2025 Northern reported that around 800 passenger facing staff had not received disability awareness training. This is around one third of all Northern permanent passenger-facing staff. On 4 November, Northern reported that it had completed delivery of its plan to address this training gap by providing training for station staff.
- 3.10. When we asked Northern to provide further evidence of the timeframe over which staff had not received required training as part of the investigation across 2021 to 2025 (see Annex C for the questions we asked), its response of 17 December 2025 stated:
- *“Northern has worked hard to understand the timeframe over which required staff did not receive Disability Awareness training following the move into public ownership. Regrettably, Northern do not hold complete records to establish the station staff who would require the training nor that this training has been completed. Whilst Northern are confident that previous figures shared with ORR are broadly correct, further work needs to be undertaken to ensure that Northern can be confident about the records it holds moving forward. It is for this reason that we are unable to share any evidence to support the additional questions provided for 1.1-1.11.” (ORR’s question references)*
- 3.11. Northern was therefore unable to confirm if or when its station staff had completed disability awareness training either initially by the 31 December 2021 deadline, as part of induction for new starters or as part of any 2-year refresher training cycle.
- 3.12. With regard to the disability awareness training delivered in October 2025, in its response on 4 February 2026 to our Case to Answer letter, Northern confirmed that all relevant station staff completed the training, covering mandatory outcomes 1-8 and 9c, and records of this are held within its learning

management system.

- 3.13. A gap remains for some staff with respect to one of the mandatory training outcomes (outcome 9), which Northern states is its priority focus and aims to resolve by July 2026.

Findings

- 3.14. Northern has been developing disability awareness training plans and materials for its staff since 2021, when its ATP was established. Northern has stated that both induction and refresher training have been delivered to conductors. However, induction training for new station staff has only been provided since late 2023 and the evidence indicates that most station staff appear not to have had access to disability awareness refresher training until 2025.
- 3.15. Staff at Northern's ten busiest stations received training that addressed some of the mandatory training outcomes in 2025, as part of Northern's passenger assistance improvement plan, and disability awareness refresher training was delivered to station staff across Northern's network in October 2025. A gap remains for some staff with respect to one of the mandatory training outcomes (outcome 9), which Northern aims to resolve by July 2026.

Impact on disabled passengers

- 3.16. We sought to establish the impact of the training gap on disabled passengers.
- 3.17. The purpose of staff training is to ensure that disabled passengers receive a good service from all staff. The mandatory training outcomes were arrived at following extensive consultation with disabled passengers, disability campaigners, disability organisations, and the rail industry, and are specifically targeted to support a good quality service for all disabled passengers. They are designed to address the consistent feedback that staff should understand the complexity of disabilities and appreciate the challenges each person faces.
- 3.18. Where disability awareness training is delivered well, and staff can assist disabled passengers with confidence, it should result in a more reliable service and more positive experiences. Where staff are not well trained and do not understand the challenges some passengers face or their responsibilities as staff, it opens up risks of negative experiences for disabled passengers.
- 3.19. In its 17 December 2025 submission, Northern stated that it:

- *“understands the potential impact on some disabled customers who may not have received the standard of support they rightly expect.”*

3.20. ORR has been engaging with Northern since July 2024 regarding its passenger assistance reliability, which has been historically poor. In its 17 December 2025 submission, Northern reported on the positive impact of training it delivered in October 2025 on assistance reliability, supported by insights from Northern’s accessibility mystery shopping programme, post and during travel and customer experience centre survey.

3.21. We note that Northern also took a wide range of actions under its 2024 improvement plan on assistance reliability that were designed to deliver improvements in the same areas.

3.22. In the 17 December 2025 submission, Northern also highlighted data relating to other aspects of the passenger experience:

- *“To help assess potential impact, we have reviewed customer experience indicators during the relevant timeframe. Our overall Customer Satisfaction (CSAT) scores for customers who have indicated they have a disability consistently perform higher than overall CSAT for all customers. In the ORR benchmarking report between 2022 to 2025 Northern received an average of 93% satisfaction with assistance received at the station and with staff knowledge and proficiency at the station. Northern complaint volumes relating to accessibility have continued to be low at an average 0.7 per 100k journeys.”*

Findings

3.23. Disability awareness training is intended to equip staff with the tools to better understand the needs of disabled passengers and how these can best be met to support their journeys on the rail network. Northern has acknowledged the impact on disabled passengers caused by the gap in training provision.

4. Underlying causes

Northern's internal audit findings

- 4.1. Our investigation sought to explore the circumstances that led to staff not receiving training when required and how the issue remained unresolved and unreported during this timeframe.
- 4.2. Northern did not make ORR aware of gaps in provision of disability awareness training until it reported data under new reporting requirements in August 2025 (see timeline of engagement in annex B).
- 4.3. Prompted by our investigation initiation letter of December 2025, Northern commissioned an urgent high level internal audit to investigate why the training issue went unresolved and unreported.
- 4.4. In its submission of 17 December 2025, Northern reported that the audit identified the following key issues with Northern's control framework for Disability Awareness training for passenger-facing colleagues:
- ***“Undefined Roles and Responsibilities:*** *No documented accountability for training delivery or compliance monitoring. A RACI has now been established and approved by Northern's Director Group.*
 - ***Data Fragmentation:*** *Absence of a single source of truth, making compliance tracking difficult.*
 - ***Lack of Standard Operating Procedure (SOP):*** *No formal process in place for managing this training”.*
- 4.5. RACI is an acronym for a project management tool that describes who is Responsible, Accountable, Consulted and Informed.
- 4.6. We note that Northern, in evidence cited earlier, has also pointed to issues around rostered time off for training and access to e-learning as key issues for station staff.
- 4.7. As a result of the audit, Northern also stated that *“Northern is unable to provide assurance at this stage over its records”* and, for that reason, did not provide responses to many of the questions that we posed to them (see Annex C).

- 4.8. The audit made a number of recommendations which Northern has committed to take forward (see chapter 5).

Findings

- 4.9. Northern did not make ORR aware of gaps in provision of disability awareness training until it reported data under new reporting requirements in August 2025.
- 4.10. Northern's own internal audit identified a number of systemic issues relating to governance processes, monitoring and controls as key issues that led to the failure to deliver training to staff.

5. Assurance and improvements

5.1. Our investigation has examined how Northern can assure itself, its passengers and ORR that:

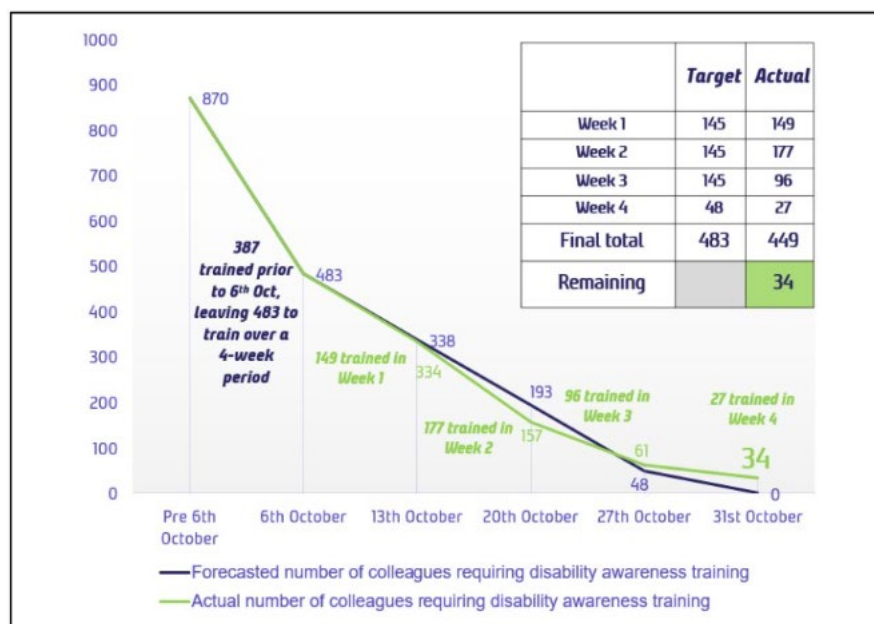
- The recent training has been effective and is enabling staff to meet the required training outcomes; and
- A similar situation will not arise in future.

Recent training

5.2. On 15 October 2025 Northern provided a detailed training plan to address the gap in disability awareness training for station staff. It set a target to deliver outstanding training by 31 October 2025 using 20 Passenger Assist Champions and Team Leaders to deliver training face-to-face at stations.

5.3. On 4 November 2025 Northern submitted a final report confirming that delivery of the plan had been completed on 31 October 2025.

5.4. The chart below is an extract from the final weekly progress report submitted by Northern on 4 November 2025 and shows the trajectory for Northern training the staff it identified as having insufficient training records and therefore needing training.



5.5. Northern reported that written records of attendees were kept at the station to be manually entered into Northern's Learning Management System (LMS) at a later stage.

5.6. In its response on 4 February 2026 to our Case to Answer letter, Northern confirmed that records had been entered into its LMS. It also provided an update on training for the 34 station staff who were on long term absence in October 2025. As of 3 February 2026, nine have returned to the business and were awaiting Disability Awareness training, while the rest have either received it, have left the business or are still absent.

Will a similar situation arise in future?

5.7. Northern's own internal audit identified a number of systemic issues relating to governance processes, monitoring and controls as key issues that led to the failure to deliver training to staff. The audit made a number of recommendations which Northern has committed to take forward. In its submission of 17 December 2025, Northern stated:

- *“Northern will take steps to strengthen governance and compliance around disability awareness training. To sustain this, we recognise that we need to improve our systematic monitoring and management of accessibility risks, with appropriate governance for decision-making and escalation thresholds. We have conducted an immediate audit, and we recognise there are improvements needed in the supporting documents and procedures and to ensure that there is a robust structure in place.”*

5.8. In an appendix to its submission on 17 December 2025, Northern set out plans for Disability Awareness: Approach to Improvement, that set out the details of the actions that it would take, and the timescales. The plan identified four priority areas, with specific actions associated with each, to be delivered largely by end March 2026:

- review governance controls and reporting
- define role-based training requirements
- address retrospective gaps

- update induction, onboarding and refresher training

5.9. We have assessed the plan and consider it to be comprehensive and well-targeted at tackling systemic issues relating to governance, oversight and delivery of disability awareness training. The actions set out, once delivered, should offer confidence that Northern will be able to meet, and demonstrate that it is meeting the commitments set out in its ATP relating to delivery of disability awareness training for staff and provision of the management and oversight arrangements to support and assure delivery of that training.

5.10. Of the 23 actions in the plan, eight were to be delivered by end January and were confirmed as complete by Northern in their response to our Case to Answer letter of 4 February 2026.

Findings

5.11. The training undertaken by Northern in October 2025 went a significant way towards closing the training gap for station staff. However, until systemic issues are addressed there is a risk that similar issues with disability awareness training could re-occur.

5.12. Northern has set out actions that it plans to take aimed at resolving the systemic issues. These are tailored to address the issues identified in Northern's internal audit with some actions already complete and most to be completed by end March 2026.

6. Annexes

Annex A: Terms of reference of investigation

Annex B: Chronology of events

Annex C: Follow up questions issued as part of investigation

Annex D: Supporting data

Annex A: Terms of reference of investigation

Investigation initiation letter from ORR to Northern dated 4 December 2025

ORR investigation of Northern Trains Limited's Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory Provisions: Passenger

I am writing to inform you we are opening a formal investigation into whether Northern contravened, or is contravening, Condition 5 of its Station Licence and GB Statement of National Regulatory Provisions (SNRP): Passenger. We are inviting you to share further information with us by close of business on Wednesday 17 December 2025.

Background

Condition 5 of the Station Licence and GB SNRP: Passenger requires the holder to establish and comply with an Accessible Travel Policy (ATP).

ORR approved Northern's ATP on 25 February 2021. Northern committed to deliver disability awareness training covering the mandatory training outcomes to existing passenger facing staff by 31 December 2021; induction training for new staff thereafter; and refresher training every two years. In 2022, through the ATP annual review process, Northern amended its ATP to remove the now historic reference to the 31 December 2021 commitment. Whilst the ATP has been updated since 2021 as part of an annual review process, commitments regarding the ongoing training of new and existing staff have remained.

On 12 August 2025, in response to ORR's new approach to monitoring training delivery, Northern reported that around 800 staff members, consisting of station-based staff and revenue protection officers, had not completed disability awareness training. On 3 October 2025, I wrote to you setting out my concerns about the impact this lack of training may have had on the experiences of your passengers, and also that Northern had not made us aware of this compliance issue before.

Upon our request Northern provided a plan on 15 October 2025 setting out how it would ensure that affected staff were able to meet the training requirements set out in the ATP guidance. Northern's plan was ambitious and aimed to deliver training to all staff who required it over a 4-week period and be completed by 31 October 2025. On 4 November 2025, Northern reported that it had fulfilled the plan and all training had been delivered.

Given the concerns already raised with Northern, the scope of the investigation will include the following:

- The timeframe over which staff who had not received required training were interacting with disabled passengers, and the scale and impact of the issue;

- The circumstances that led to staff not receiving training when required and how the issue remained unresolved and unreported during this timeframe;
- How Northern can assure itself, its passengers and ORR that i) the recent training has been effective and is enabling staff to meet the required training outcomes and ii) a similar situation will not arise in future.

Delivering the investigation

Jacqui Russell, Head of Consumer, will lead this investigation and Stewart Hill will support Jacqui as lead contact. We will carry out our investigation in accordance with our economic enforcement policy processes.

We will review the information we already hold on this matter and would welcome any additional information Northern would like us to consider, which could be shared with us in writing or through discussion of the issues, by close of business on Wednesday 17 December 2025.

We may also provide you with further specific clarification questions and/or requests for information or require additional engagement. Should we choose to do so, we will write to you under separate cover.

Given the engagement between us already undertaken on this issue, we aim to conclude our investigation as soon as possible. We will write to Northern again to advise of our findings and any relevant next steps in our process.

Our economic enforcement policy also encourages licence holders to offer reparations to be considered as part of our enforcement process, if a licence holder is willing to acknowledge its failings. Where reparations are to be offered, we prefer licence holders and relevant operators to offer reparations as early as possible.

To the extent you may be considering carrying out an internal review covering this matter, we would expect you to conduct the same with an eye to reducing unnecessary burden on yourselves, but without limiting in any way your response and provision of information to our investigation.

The outcomes of this formal investigation could ultimately result in a finding of breach of Northern's Station Licence and GB SNRP: Passenger, and if appropriate, formal action.

Please be aware that we may use any information you provide, including information provided to date, to inform the discharge of our regulatory functions. We will publish our findings.

If you have any questions, please do not hesitate to contact Stewart Hill (...). A copy of this letter will be published on our website in due course.

Annex B: Chronology of events

Table B.1 - Chronology of events / actions 2019-2026

Date	Commentary on event / actions
July 2019	ORR announced new disability awareness training requirements and shared guidance for operators via an industry letter to all Train Operating Companies (TOC) managing directors. TOCs were asked to submit a plan alongside revised ATPs setting out how the new disability awareness training requirements would be met. TOCs were also asked to provide a report by July 2020 outlining progress towards meeting the new training requirements. Operators are required to provide training for existing staff by 31 July 2021, and then induction training for passenger-facing staff, with refresher training for all every two years.
2019 and 2020	Northern engaged positively and committed to meet the training requirements across several communications. As Northern began to share plans with ORR, concerns arose about its ability to meet the deadline of 31 July 2021 while delivering the required quality. These concerns were shared with Northern which committed to take steps to address them.
1 March 2020	The franchise became directly operated by DfT OLR Holdings. Northern Trains Limited trading as 'Northern' is owned by the DfT Operator for the Department for Transport (DfT).
25 February 2021	ORR approved Northern's ATP on condition of further training material being shared, which was sent by Northern on 4 June 2021. At this stage Northern committed in its ATP to deliver the training by the deadline of 31 July 2021.
July 2021	Northern requested an extension to 31 December 2021 to deliver the training. Northern stated it needed the extension to implement a 3-hour briefing to deliver face-to-face training in addition to e-learning. ORR granted an extension on this basis.

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During 2022 and 2023	Little correspondence specifically on disability awareness training between ORR and Northern. However, during the engagement in 2025, Northern suggested issues with delivering disability awareness training to station staff were known about in mid-2022 (see section 3.5).
30 January 2023	As part of the annual ATP review cycle, Northern sent a letter to ORR outlining steps to show how it enhanced its disability awareness refresher training. As part of the review, Northern raised no concerns about delivery of disability awareness training to its staff.
2024	There was no correspondence specifically about disability awareness training between ORR and Northern. However, on 19 September 2024 , ORR requested an improvement plan from Northern regarding its passenger assistance delivery due to sustained poor performance in ORR's Passenger Assist satisfaction survey. ORR letter to Northern Trains dated 19 September 2024
4 December 2024	Northern's passenger assistance improvement plan was accepted by ORR on 4 December 2024. The plan included updated disability awareness training for conductors, and refresher training for staff at the ten busiest stations.
1 April 2025	ORR introduced a new approach to monitoring compliance with disability awareness training requirements, with quarterly data reporting by all operators.
10 July 2025	Northern requested a meeting with ORR to discuss the new reporting requirements on training. The aim of the call was to understand what data was required.
12 August 2025	Northern's first submission for ORR's new monitoring data request showed that around 800 Northern passenger facing staff, consisting of station-based staff and revenue protection officers, had not received disability awareness training.
4 September 2025	Via email ORR requested an explanation of how the situation arose and Northern's plan to rectify it.

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19 September 2025	Northern submitted a training recovery plan via email to ORR.
3 October 2025	ORR sent a letter to Northern rejecting the initial plan and requesting an updated one. ORR letter to Northern Trains dated 3 October 2025
15 October 2025	Northern submitted a plan to deliver disability awareness training to the staff it identified as having insufficient training records. The training was planned to be delivered over a 4-week period and by 31 October 2025. ORR staff attended and observed three of the Northern training sessions during this period.
4 November 2025	Northern confirmed to ORR that the disability awareness training plan has been delivered.
4 December 2025	ORR opened a formal licence investigation relating to Northern's disability awareness training obligations.
17 December 2025	Northern provided a response to ORR questions issued as part of the investigation, acknowledging the issues and setting out a plan to address them.
23 January 2026	ORR sent Northern a Case to Answer letter, outlining the findings from our review of the available evidence inviting Northern to provide any further information it felt was relevant.
4 February 2026	Northern responded to the Case to Answer letter, providing more details around records of the staff trained in October 2025 and an update on progress against actions in the plan it had provided in December.

Annex C: Follow up questions issued as part of investigation

We wrote to Northern on 9 December 2025 to ask follow-up questions as part of the investigation. The content of that email is included below:

These questions identify information and evidence that we consider are relevant to ORR's investigation into provision of disability awareness training, as outlined in the investigation initiation letter of 4 December. We would ask that Northern provide its response to the questions below by Wednesday 17 December 2025. Northern may also choose to provide us with any other information it considers relevant.

1. The timeframe over which staff who had not received required training were interacting with disabled passengers, and the scale and impact of the issue.

Initial training mandate

1.1. How many passenger-facing staff were eligible for disability awareness training as of 31 December 2021, and what were their roles?

1.2. How many of these staff received disability awareness training by 31 December 2021? Please specify their roles.

1.3. Northern stated in its response of 19 September 2025 to ORR's initial request for a disability awareness training recovery plan that, in mid-2022, 'The backlog of station colleagues without DA training was acknowledged as a temporary issue, with resolution expected post-reform'. How many station staff were in this backlog?

1.4. As of 15 August 2025, when Northern submitted its core data return to ORR, how many station staff and conductors did Northern employ?

Induction training for new staff

1.5. When did disability awareness training as part of new starter induction start to be delivered?

1.6. How many passenger-facing staff who were eligible for disability awareness training joined Northern between 1 January 2022 and 4 December 2025? Please break this down by year and role.

1.7. How many of these staff received disability awareness induction training. Please

break this down by year and role.

Refresher training

1.8. When did delivery of disability awareness refresher training begin?

1.9. How many staff were eligible for disability awareness refresher training in the period between 31 December 2021 and 4 December 2025? Please break this down by year and role.

1.10. Please also confirm how many passenger-facing staff were employed by Northern as of August 15 2025, broken down by role.

1.11. How many of these eligible staff received disability awareness refresher training between 31 December 2021 and 4 December 2025? Please break this down by year and role.

2. The circumstances that led to staff not receiving training when required and how the issue remained unresolved and unreported during this timeframe.

2.1. If the response to 1.2 above indicates that not all eligible staff received disability awareness training by 31 December 2021, please provide the reasons for this together with an explanation of whether, and how, the issues were resolved.

2.2. In respect of the backlog identified in 2022, please describe how you became aware of this issue. Please also provide the reasons for this backlog together with an explanation of whether, and how, the issues were resolved.

2.3. If the response to 1.7 above indicates that not all eligible staff received disability awareness induction training, please provide the reasons for this together with an explanation of whether, and how, the issues were resolved.

2.4. If the response to 1.11 above indicates that not all eligible staff received disability awareness refresher training, please provide the reasons for this together with an explanation of whether, and how, the issues were resolved.

3. How Northern can assure itself, its passengers and ORR that:

i) the recent training has been effective and is enabling staff to meet the required training outcomes

3.1. How did Northern identify the staff that were reported in the Core data return of 15 August 2025 to require disability awareness training?

3.2. In discussions between Northern and ORR, Northern has described the approach to delivering the disability awareness training during October 2025 as 'train the trainer'. Please outline the process that was followed to prepare colleagues for delivering the training.

3.3. How did Northern assure itself that the disability awareness training delivered during October 2025 had been delivered effectively, covering the required training outcomes?

ii) a similar situation will not arise in future

3.4. Northern described reasons why training has not been delivered in its response of 19 September 2025 to ORR's initial request for a disability awareness training recovery plan. What steps have been taken, or are planned, to mitigate what Northern has described as 'training access barriers'? Please provide the dates for when those steps were taken or are planned to be taken.

3.5. What steps have been taken, or are planned, to monitor and record the delivery of disability awareness training? Please provide the dates for when those steps were taken or are planned to be taken, together with any documentary evidence.

3.6. What steps have been taken, or are planned, to assure the quality of disability awareness training for passenger-facing staff? Please provide the dates for when those steps were taken or are planned to be taken, together with any documentary evidence.

Annex D: Supporting data

ORR's Experiences of Passenger Assist survey 2021-2025

Table 1: Proportion of passengers who reported they received none of the assistance booked

Year	Northern Trains	Other Operators
2021–2022	24%	11%
2022–2023	13%	8%
2023–2024	18%	12%
2024–2025	19%	11%

Table 2: Overall Satisfaction of passengers with assistance at the station

Year	Northern Trains	Other Operators
2021–2022	91%	94%
2022–2023	94%	95%
2023–2024	97%	94%
2024–2025	94%	94%

Table 5: Satisfaction of passenger with staff knowledge and proficiency

Year	Northern Trains	Other Operators
2021–2022	95%	95%
2022–2023	94%	94%
2023–2024	96%	94%
2024–2025	94%	94%

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