



NORTHERN

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4 February 2026

Dear Stephanie

Re: 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

Thank you for your letter dated 23 January 2026 and for providing Northern with the opportunity to offer further representations as part of this case to answer.

We value ORR's constructive engagement and remain fully committed to ensuring compliance with our enduring position outlined in our Accessible Travel Policy and ultimately improving outcomes for our disabled customers.

Additional Information on areas of potential contravention - Stations

Northern recognises it has failed to comply with commitments and needs to improve its control framework with clear governance and accountability matrices; systematic monitoring and reporting of training; and management of risks and controls, to ensure that issues are readily identified and rectified.

We want to reassure you that all relevant station staff completed the Disability Awareness training delivered by Northern in October 2025. This covered mandatory training outcomes 1–8 and 9c, with the exclusions set out in our October 2025 response to ORR. Northern holds records that support the information shared with ORR in our final report on 4 November 2025. These records are also held within our learning management system.

The learning management system extract is currently only available as an Excel file and includes personal details of our colleagues, so it cannot be shared. However, the data has been downloaded, checked, and validated by our [REDACTED] Manager. A summary of this is included below in Appendix A and confirms the level of training completed both at the time and subsequently.

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Our priority focus now for station staff is the delivery of refresher training for mandatory training outcome 9. As per our Approach to Improvement plan, we have a target to schedule and deliver training to high-risk cohorts by mid-March. I am pleased to say the first programme of training for 72 colleagues commenced on 29 January 2026 with a planned completion of 18 February 2026.

Northern has implemented a change to its Stations operating model, moving Stations into the Commercial and Customer directorate, led by a new Director of Stations, separate from Train Operations. The move to a standalone Stations function provides clear benefits for customers. It ensures a dedicated focus on Stations, with leadership and accountability aligned directly to the customer experience, rather than being combined with train operations.

This structure supports a [REDACTED], which in the future will enable targeted investment in people, processes and capability. It strengthens our ability to prioritise training and upskilling for station colleagues, supporting consistent, high quality customer service and improved outcomes for passengers, including those requiring additional assistance.

Update on Disability Awareness - Approach to Improvement.

Northern has set out our Disability Awareness: Approach to Improvement. Through delivery of this plan, ORR can be confident that Northern are working towards a materially stronger and more transparent approach to the definition, governance and oversight of disability awareness training. I am pleased to confirm that all actions scheduled for completion by January 2026 have now been delivered, the outcomes of which include the below.

1. Clear and strengthened governance framework for mandatory training

A defined and documented governance framework is now in place which includes a Mandatory Training Steering Committee. This will provide oversight, senior accountability, structured challenge and proactive identification and management of training-related risk.

2. Defined mandatory training requirements for station roles

Training requirements for station colleagues have been defined with input from operational leaders, accessibility specialists and compliance, documented in a training matrix.

3. Improved accountability for training definition and records management

Northern have documented ownership for defining training requirements, maintaining training records and ensuring updates are made, reducing ambiguity and reliance on informal processes.

4. Improved visibility of training records

Northern have improved organisational visibility of training completion, agreeing an interim process for capturing records from disconnected data sources within our Learning Management system which will enable a consolidated view of training coverage and gap identification.

5. Clarity on ramp training scope and delivery capability

ORR can be confident that Northern are clear on which roles require ramp training, the levels of competency in delivery and where refresher training may be required. This enables

informed prioritisation and targeted follow-up where gaps exist, with targeted ramp training now underway.

6. Enhanced oversight from second-line assurance and compliance

Compliance and second-line assurance are reviewing Northern's revised governance approach to mandatory training and this will be built into the process for defining and reviewing mandatory training requirements. This will provide assurance that training arrangements remain aligned to regulatory expectations.

Collectively, these early outcomes can provide assurance to ORR that Northern is moving toward a structured, governed and transparent approach to Disability Awareness training, in line with internal audit recommendations, and in support of providing better service to our customers.

An overview of the status of Disability Awareness - Approach to Improvement Programme delivery is included in Appendix B.

Our commitment to continuously improving Accessibility for all our customers.

Our proposed reparations included a commitment to an estimated spend of £550k by March 2027. Northern have been focused on progressing this, including the purchasing of laptops per line of route to enable effective completion of eLearning-based training and enhancing people resources to accelerate the delivery of the Disability Awareness – Approach to Improvement as part of standing up the Programme Delivery team.

NTL have invested heavily in projects to enhance accessibility and the reliability of assistance delivery over the last 18 months. Our Passenger Assistance Improvement Plan saw us spend c. [REDACTED] in 2024/25, including an investment in nine Customer Relation Advisors to run our dedicated Assisted Travel Support service and seventeen Passenger Assist agents to support delivery of passenger assistance across our busiest stations.

Both investments are in addition to the wider accessibility work we do when enhancing stations or trialling new schemes such as GoodMaps, Priority Seating covers and enhanced signage, and improved Boarding and Meeting points for Passenger Assistance.

Through 2026, our priority is to reduce instances of failed assistance and strengthen confidence for all customers to travel. We will use insights from colleagues and customers to drive continuous improvement. Over the next three years, our Accessibility Delivery Plan includes a continued annual investment of around [REDACTED] in OpEx and significant investment in CapEx, reinforcing our commitment to improving accessibility for all.

Thank you for the opportunity to provide additional evidence in the investigation. Northern is taking decisive steps to address the issues and our commitment is clear. We will maintain transparency, strengthen assurance and continuously improve accessibility for all our customers.

Yours sincerely

Tricia Williams
Managing Director

Appendix A

The below shows a summary of the extract from the Northern learning management system detailing status as of 3 February 2026. This has been reviewed and validated by our [REDACTED] Manager.

Figure 1 – outlines for Northern core station staff the position as we reported on 3 November 2025 and an update of the outstanding colleagues as of 3 February 2026.

Figure 1

Total number of NTL core station staff:	870
Colleagues who had received disability awareness training as of 03.11.2025:	836
[REDACTED]	

Figure 2 – outlines for Northern Revenue Protection Officers (NTL RPOs) the position as we reported on 3 November 2025 and an update of the outstanding colleagues as of 3 February 2026.

Figure 2

Total number of NTL RPOs:	78
Colleagues who had completed disability awareness training as of 03.11.2025:	66
[REDACTED]	

Figure 3 – outlines for Northern agency staff the position as of 3 February 2026.

Figure 3

Total number of NTL agency staff:	306
Total number of NTL agency staff who have completed disability awareness training as of 03.02.2026:	297