

Stephanie Toby

Director, Strategy, Policy and Reform

Tricia Williams
Managing Director
Northern Trains Limited

23 January 2026

Dear Tricia

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

On 4 December 2025, I [wrote](#) to you to advise that ORR was initiating a formal licence investigation into Northern Trains Limited to establish if it had contravened or is contravening Condition 5 (Accessible Travel Policy) of its GB Statement of National Regulatory Principles (SNRP) and Station Licence.

Subject to considering any further representations from Northern, our preliminary view is that Northern has contravened, and is contravening, Condition 5 of both its SNRP: Passenger and Station Licence. This 'case to answer' letter provides you with an opportunity to share any further relevant information with us.

Background

Condition 5 of both Northern's SNRP: Passenger and Station Licence provides that it 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 ATP and comply with the commitments they make.

ORR engaged with Northern in 2024-25 to secure actions targeted at improving the reliability of assistance provision, and in 2025 to secure actions to deliver disability awareness training to passenger-facing station staff.

Our investigation has been informed by this prior engagement and focusses on whether Northern has complied, and is complying, with the commitments made in its ATP relating to the provision of disability awareness training for passenger-facing staff.

I would like to recognise and thank you for Northern's constructive and open engagement with the investigation process. We have considered a range of information provided to us by Northern, including the submission you provided on 17 December 2025. In that submission, Northern acknowledges the seriousness of the concerns raised and the potential impact on disabled customers, sets out plans to tackle systemic issues it has identified, and proposes a package of reparations.

Areas of potential contravention

As set out above, subject to considering any further representations from Northern, our preliminary view is that Northern has contravened, and is contravening, Condition 5 of both its SNRP: Passenger and Station Licence. In particular, it has failed, and is failing, to comply with commitments made in its ATP to provide disability awareness training for staff and to provide the management and oversight arrangements that would support and assure delivery of that training.

Northern's current ATP (as updated for 2025) is published on its website: [Accessible Travel Policy | Corporate | Northern](#). It includes the following commitments:

a) Staff training (Northern ATP p30)

Northern commits that: *'All new staff receive disability awareness training as part of their corporate induction, while all existing staff including senior managers and leadership team, receive refresher training at least every two years'*.

Northern's ATP also states that: *'The Office for Rail and Road (sic) have set out in their guidance nine mandatory training outcomes..., which our training includes...'*.

b) Strategy and management (Northern ATP p24)

Northern commits to *'Ensure our staff have the resources, skills and confidence to deliver assistance to customers'*, and to *'Measure the success of our Accessible Travel Policies'*.

c) Monitoring and evaluation (Northern ATP p25)

Northern commits to *'...regularly review this policy and a report on findings will be sent to the DfT and the ORR. This will include...any difficulties we have encountered with the implementation of this policy.'*

We consider there is evidence to suggest a past and current contravention against these commitments.

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 has been delivered to conductors. However,

induction training for new station staff has only been provided since late 2023 and the evidence indicates that most, if not all, station staff did not have access to disability awareness refresher training until 2025. This suggests that Northern may not have been fully complying with the commitments set out in its ATP since 2021.

Staff at Northern's ten busiest stations received training that addressed some of the mandatory training outcomes in 2025, as part of Northern's assistance reliability improvement plan and disability awareness refresher training was delivered to station staff across Northern's network in October 2025. However, Northern has stated that it does not have complete records and therefore cannot provide full assurance that all staff have now received training in line with the commitments it made in its ATP. This therefore appears to be an ongoing issue.

Northern has acknowledged the impact on disabled passengers caused by the gap in training provision. It has provided data that suggests improved reliability and satisfaction with passenger assistance following the delivery of training to station staff in October 2025. The purpose of staff training is to ensure that disabled passengers receive a good service from all staff. Northern's data would appear to indicate that its poor performance in delivering reliable assistance could have been mitigated much earlier if Northern had provided training in line with the commitments it made in its ATP, as set out above.

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. 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. As set out above, Northern has set out commitments in its ATP on strategy and management, and monitoring and evaluation.

The training undertaken by Northern in October 2025 went a significant way towards closing the training gap for station staff. However, we cannot be confident that all relevant staff have now received training, given that Northern has stated it needs to undertake further work to assure its records. Further, until systemic issues are addressed there is ongoing risk that similar issues with disability awareness training could re-occur.

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 most actions to be completed by end March 2026.

Next Steps

We welcome the actions planned by Northern to tackle the systemic issues identified in its internal audit and would be grateful for an update on your progress in delivering those actions.



We also invite Northern to make any further representations by **5pm on 4 February 2026** should they wish to do so.

We will then consider the recommendations that we make to our Board about whether, or not, Northern has contravened or is contravening its Licence.

It is for the ORR Board to determine whether or not there has been a licence breach. Should the Board determine that Northern has contravened or is contravening its licence, it will go on to consider whether enforcement action is necessary and, if so, what enforcement action to take.

As part of this process, we will highlight to the Board Northern's constructive engagement throughout our investigation and provide the reparations offer that Northern has already proposed. To enable timely consideration, and in line with our policy, we are consulting now with the DfT, Transport Focus and DPTAC on your reparations package.

The ORR Board is likely to consider these issues at its meeting in February 2026.

We may use any information you provide in response to this letter in our evidence report, which we will send to you to check for accuracy and will publish once our Board has made its decision regarding licence breach. We will publish this letter and your response on our website at the same time as the evidence report.

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

Yours sincerely

Stephanie Tobyn

Director, Strategy, Policy and Reform