



Consumer Expert Panel

5 May 2026 Microsoft Teams Meeting Notes

Name	Organisation
Anne Heal	Chair, Non-Executive Director, ORR
Sarah Chambers	Consumer Expert Panel Member
Kate Denham	Consumer Expert Panel Member
Ralitsa Hiteva	Consumer Expert Panel Member
Claudio Pollack	Consumer Expert Panel Member
Marie Pye	Consumer Expert Panel Member
Lewis Shand-Smith	Consumer Expert Panel Member
Andrew Williams	Consumer Expert Panel Member
Robin Hewings	Transport Focus
Jacqui Russell	ORR
Dan Roberts (Item 1)	ORR
David Kimball (Item 2)	ORR
Howard Taylor, Andy Barron (Item 3)	ORR
Nadira Ferdous	ORR Secretariat

Item	Speaker	Time
Welcome	Anne Heal	10:00
Update on work of Consumer Team	Jacqui Russell	10:05

Item	Speaker	Time
1. The future ORR – Passenger Watchdog relationship	Dan Roberts	10:15
2. Redress for failed assistance	David Kimball	10:55
3. Holding Network Rail to account on environmental issues	Howard Taylor, Andy Barron	11:35
4. Horizon scanning	Anne Heal	12:15
Closing remarks and AOB	Anne Heal	12:25

Chair's Welcome

1. Anne Heal welcomed the Panel and noted that Claire Clark, who had previously provided secretariat support to the Consumer Expert Panel, was currently on maternity leave. Jacqui Russell introduced Nadira Ferdous, who had taken over the secretariat role for the meeting.

Consumer Team Update

2. **Jacqui Russell** provided an update that covered several key consumer team activities and recent regulatory developments related to [Artificial intelligence and its impact on consumers](#), [National Highways draft customer and delay action plan](#), and [Car parking at railway stations - competition horizon scan](#).
3. The Panel received an update on the Railways Bill and wider rail reform programme. Jacqui explained that the Bill had nearly completed its passage through the House of Commons and is expected to move to the House of Lords before summer recess, where further scrutiny is anticipated, including around the proposed Passenger Watchdog arrangements.
4. Jacqui also updated the Panel on all ORR's recently concluded enforcement case relating to Northern Trains' compliance with passenger assistance training requirements. She explained that the investigation had focused on failures in training governance, record keeping and compliance assurance. Northern Trains had since undertaken a substantial programme of remedial action, including governance reforms, additional staff training and a £550,000 reparations package focused on rebuilding confidence among disabled passengers.
5. Anne Heal noted the seriousness of the issue and welcomed the speed and effectiveness of the regulatory response.

6. Panel members discussed the importance of deterrence in enforcement action, including whether sufficient signals were being sent to the wider sector. Jacqui explained that ORR had carefully considered its enforcement policy, including deterrence factors, before deciding that neither an enforcement order nor financial penalty was appropriate in this case.
7. The discussion also explored lessons for ORR and the wider rail industry. Panel members raised questions around assurance processes, the importance of robust compliance monitoring, sector-wide learning, and how public awareness of reparations and redress can be improved. Jacqui explained that ORR had strengthened its monitoring approach for disability awareness training by introducing quarterly compliance data requests across all operators, which had enabled the issue at Northern Trains to be identified.
8. Panel members additionally discussed the role of mystery shopping, organisational culture and behavioural change within operators. Jacqui noted that most operators undertake mystery shopping activity, and that Northern Trains had significantly expanded its programme following ORR's interventions. She also reflected on the wider challenge of embedding stronger passenger-focused culture across the rail industry as part of rail reform.
9. The Panel discussed the challenges associated with enforcement in a publicly funded rail sector and the importance of identifying effective regulatory levers and incentives in the future GBR landscape.

Item 1: The future ORR – Passenger Watchdog relationship

- 1.1 **Dan Roberts** introduced a discussion on the future relationship between ORR and the proposed Passenger Watchdog, including how effective collaboration, coordination and information sharing between the organisations could support positive outcomes for passengers. He invited views on lessons from existing models and examples of effective partnership working across sectors.
- 1.2 Panel members discussed the importance of ensuring that arrangements remain clear and accessible for passengers, including avoiding confusion over organisational roles and complaints pathways. Members highlighted the need for a strong working relationship between organisations, supported by clear leadership, shared objectives, and effective communication processes. The importance of a principles-based approach to the Memorandum of Understanding (MoU) was emphasised, with members generally favouring concise and flexible arrangements rather than overly prescriptive documentation.

- 1.3 The panel also discussed the importance of clearly defining areas of overlap, escalation and responsibility between organisations, particularly in relation to enforcement, accessibility, and consumer advocacy. Members highlighted the need for effective information sharing and “no surprises” communication between organisations, while ensuring compliance with data protection requirements.
- 1.4 Several members drew on examples from other sectors, including energy, financial services, and water regulation, to illustrate both effective and ineffective approaches to inter-organisational coordination. Members also suggested that scenario testing and practical case studies could help identify potential gaps or challenges in the future model.
- 1.5 Dan welcomed the feedback and confirmed that ORR is pursuing a principles-based approach to the relationship framework and is already engaging with Transport Focus on issues including data sharing, complaints handling and the interface between monitoring, compliance, and enforcement activities.

Item 2: Redress for failed assistance

- 1.6 David Kimball introduced ORR’s work on guidance relating to redress for failed passenger assistance. He noted that initial stakeholder engagement with operators, accessibility stakeholders and other organisations had indicated broad support for the development of guidance in this area, including from operators who both did and did not currently have detailed internal processes in place.
- 1.7 Panel members discussed the importance of ensuring that redress processes remain passenger-focused and do not create unnecessary burdens for disabled passengers. Several members emphasised that operators should avoid approaching claims defensively or treating passengers as though they were “gaming the system”. Members also stressed the importance of ensuring passengers are clearly informed about what actions operators will take to prevent repeat failures.
- 1.8 The Panel discussed the balance between financial and non-financial redress. Some members emphasised the importance of financial compensation in recognising passenger impact and incentivising improvement, while also highlighting of non-financial remedies such as apologies, service improvements and assurance measures. Members noted the importance of ensuring any redress arrangements are proportionate, consistent and straightforward for passengers to access.

- 1.9 Members also discussed the burden of evidence within the claims process. Several members suggested that operators should take greater responsibility for evidencing whether assistance had been delivered as booked, rather than relying heavily on passengers to demonstrate failure. Concerns were raised that overly complex or evidentially burdensome processes could discourage claims and undermine confidence in the system.
- 1.10 Their discussion further explored issues including consistency of outcomes across operators, the role of standardisation and monitoring, and the important of clear expectations and definitions within the guidance. Members also highlighted the need to capture wider patterns and systemic issues arising from failed assistance cases.
- 1.11 David thanked the panel, welcomed the feedback, and noted that ORR is continuing to develop its approach, including considering how outcomes and consistency could be monitored in practise and whether wider guidance changes may be required in the future.

Item 3: Holding Network Rail to account on environmental issues

- 1.12 Howard Taylor and Andy Barron introduced ORR's work to hold Network Rail to account on environmental measures, including carbon emissions, biodiversity, air quality and waste. They explained that these measures are relatively new for Network Rail in the current control period and are technically complex, and invited views on how ORR's role and approach comes across to consumers and wider stakeholders.
- 1.13 Panel members discussed the importance of clear targeting in ORR's regulatory approach, including focusing on areas where regulation can have the greatest impact and where outcomes can be meaningfully measured. Members also reflected on the need to be clear about the purpose of ORR's environmental regulation and how this benefits rail users and wider stakeholders.
- 1.14 The Panel highlighted the importance of tailoring communications for different audiences, including environmental experts, rail specialists, journalists and rail users. Members suggested using clearer explanations, practical examples, illustrations and layered messaging to make technical issues more accessible, while retaining sufficient detail for specialist audiences. Members also encouraged ORR to reduce unnecessary acronyms and technical language, and to use "fluent human" language wherever possible.

- 1.15 The discussion also covered the complexity of scope 1, 2 and 3 emissions, biodiversity and the importance of focusing on material issues rather than areas that are easier to measure but less impactful. Members noted growing public interest in biodiversity and environmental performance across regulated sectors.
- 1.16 Howard and Andy welcomed the feedback from the Panel and noted several areas for follow up, including considering better targeting of regulatory activity, using layered communications for different audiences, developing clear explanation of ORR's role, reviewing examples of good practise from other organisations, and taking up offers of further discussion from Panel members.

Item 4: Horizon scanning

- 1.17 Anne Heal invited Panel members to raise any wider issues or reflections. Members asked about the future of the Consumer Expert Panel in the context of rail reform and the proposed Passenger Watchdog. Jacqui Russell explained that this had not yet been considered in detail but would need to form part of ORR's wider transformation planning.
- 1.18 The Panel also discussed whether any future panel arrangements would sit with ORR, the proposed Passenger Watchdog, or both. Jacqui noted that this remained an open question, alongside wider decisions about future governance and stakeholder engagement arrangements.
- 1.19 Members commented positively on the format and clarity of the meeting papers. One member also highlighted accessibility issues with the use of web links in papers and suggested that key information should be included directly in the papers where possible.

AOB

- 10. Next meeting is 23 September 2026 at 11am.
- 11. Anne thanked attendees and brought the meeting to a close.