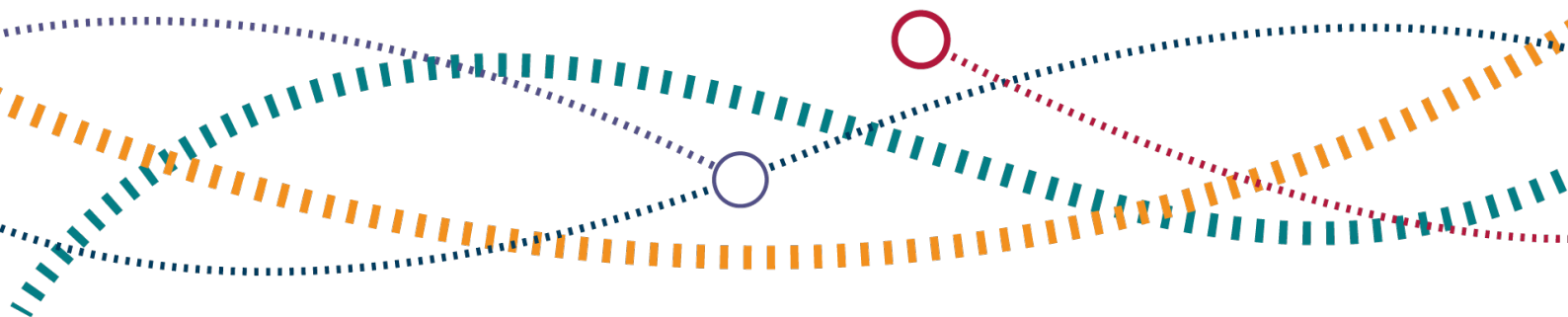




27 July 2026

Modifying non-GBR licences in the context of rail reform

Discussion document



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Executive summary

1. The Government intends to establish Great British Railways (GBR) as the railway's integrated directing mind as well as the operator of the vast majority of infrastructure and most passenger trains and stations. GBR is expected to operate under a railway licence issued by the Secretary of State and enforced by ORR. Alongside GBR, a significant number of other “non-GBR” operators of trains, stations, depots and networks will continue to hold licences issued, managed and enforced by ORR. This discussion document sets out ORR's emerging thinking on how these non-GBR licences may need to be modified to support rail reform.
2. We intend to take a targeted and proportionate approach to our review of existing licences. In developing any modifications, we will seek to ensure coherent standards across the railway, avoid unnecessary disparities between licence holders and ensure the framework meets legal requirements and Government policy intentions.
3. Based on the Railways Bill and information published by the Department for Transport (DfT), we expect the most significant areas for change to relate to consumer protections and industry coordination arrangements. In particular, licence modifications are likely to be required to make Passenger Watchdog standards binding on relevant non-GBR operators and to reflect GBR's future role in providing industry-wide systems and functions. There are other areas where change will be needed, but also existing licence requirements that will remain broadly as today.
4. This discussion document seeks feedback on ORR's proposed approach to considering and making changes to non-GBR licences. It represents the first stage of our engagement and is intended to inform further policy development. Feedback will help shape ORR's formal policy consultation, which is expected to take place alongside the DfT's consultation on the GBR licence in Autumn 2026. Subject to the passage of the Railways Bill, this would be followed by a statutory consultation on specific licence modifications, with the aim of notifying all non-GBR licence holders of the outcome of the statutory process ahead of GBR Day 1, when GBR's licence becomes operational.

1. Background and context

Purpose of this document

- 1.1 Great British Railways (GBR) is expected to hold a single integrated railway licence issued by the Secretary of State. Many other operators and infrastructure managers will continue to hold licences issued by ORR under the Railways Act 1993 and the Railway (Licensing of Railway Undertakings) Regulations 2005 (“2005 Regulations”). Holders of “non-GBR” licences will include devolved, freight and open access train operators, infrastructure managers, light maintenance depot (LMD) operators and station operators that remain outside GBR.
- 1.2 We have produced this discussion document to:
 - (a) Set out the context for potential changes to non-GBR licences in light of rail reform and the establishment of GBR and the Passenger Watchdog;
 - (b) Inform stakeholders on how ORR is approaching potential modifications to non-GBR licences; and
 - (c) Invite views on our emerging thinking to inform further policy development.
- 1.3 This is not a formal consultation and does not set out firm policy proposals. Instead, it provides a high-level overview of our current thinking and highlights areas where we expect licence modifications may be necessary.
- 1.4 Development of GBR’s licence is ongoing and is led by the Department for Transport (DfT). While the modifications to non-GBR licences that may be required or desirable are related to the content of GBR’s licence and wider sector reforms, this document does not provide or seek views on DfT’s emerging proposition for GBR’s licence.

Subsequent processes

- 1.5 DfT has committed to a formal public consultation on GBR’s licence in Autumn 2026. To enable affected stakeholders to consider both licence proposals in a joined-up way, we plan to hold our formal policy consultation on non-GBR licence modifications at around the same time as DfT’s consultation on GBR’s licence. [DfT’s policy publication timetable](#) provides detail on key milestones.

- 1.6 After the Railways Bill has received Royal Assent, we expect that our policy consultation will be followed by statutory consultation on any modifications to individual licences under amended procedures introduced by clauses 76 and 77 of the Railways Bill (HL Bill 25 as brought from the House of Commons).
- 1.7 The amended statutory procedure for ORR to modify non-GBR licences will include a minimum 28-day statutory consultation with licence holders in which ORR must set out and publish proposed modifications, their effect and the reasons for them. Unlike today, under the amended procedure ORR will not require licence holder agreement to the proposed modifications, however we will be required to take account of any representations or objections received within the consultation period. A 56-day notice period will also apply between ORR's final decision on modifications and any modifications taking effect. The Railways Bill also removes the as-yet unused mechanism for ORR to refer proposed licence modifications to the Competition and Markets Authority. In addition to the statutory consultation process, we will carefully consider any relevant stakeholder views received in response to this discussion document, targeted stakeholder engagement and our formal policy consultation.

Context

- 1.8 The UK Government is undertaking a programme of rail reform following its [consultation](#) and [subsequent response](#), which set out proposals for significant structural change to the rail sector. The legislative process to give effect to the reform programme is underway, with the [Railways Bill](#) currently progressing through legislative scrutiny in the House of Lords. Alongside this, DfT, Network Rail, DfT Operator Limited, Transport Focus and ORR are developing the policies and processes which will underpin and give effect to the reforms.
- 1.9 Central to the reform programme is the establishment of GBR as a single “directing mind”, bringing together responsibility for most rail infrastructure and passenger services, as well as for setting fares and managing industry systems.
- 1.10 As part of the Government's reforms, the future Passenger Watchdog will be responsible for setting and monitoring consumer standards, including in relation to passenger information, accessible travel, complaints and delay compensation. The watchdog will also take over sponsorship of the Rail Ombudsman from ORR. It is expected that Passenger Watchdog standards will be made binding on the industry via conditions in both GBR and non-GBR operators' licences.

GBR's licence

- 1.11 GBR's licence is expected to differ in important respects from existing Network Rail licences, and to include new obligations reflecting Government policy. This is discussed in more detail in Chapter 2 below.
- 1.12 In November 2025, DfT published [information on how GBR will be held to account under the new framework](#). In May 2026, DfT published [information on how GBR's licence is expected to fit into the reformed accountability framework](#), which included a broad “heads of terms” for GBR's licence and DfT's policy intent for each licence condition expected in GBR's licence (subject to consultation).
- 1.13 Our published [briefing on what the Railways Bill means for the role of ORR](#) sets out ORR's understanding of our future functions and role in the context of rail reform, including enforcing GBR's licence.

Railway licences in the context of rail reform

- 1.14 In the future, as today, it will be an offence to operate railway assets without the appropriate licences or exemptions, and ORR will be responsible for monitoring and enforcing all railway licences.
- 1.15 For both GBR and non-GBR operators, railway licences will provide the basis for ORR enforcement and remain a key mechanism for implementing regulatory requirements and ensuring effective accountability arrangements across the sector.
- 1.16 Between the operators and infrastructure managers not expected to form part of GBR, there are currently approximately 50 active licence holders holding around 90 licences in total, as operators require separate licences for operating different railway assets (for example, both train and station operation), alongside a small number of inactive licences (e.g. “operator of last resort” licences that are held for contingency purposes).
- 1.17 Licensing requirements for non-GBR licence holders will continue to derive from the Railways Act 1993 (for network, station, LMD, passenger train, and non-passenger train licences) and the 2005 Regulations for railway undertaking passenger and freight licences and associated Statements of National Regulatory Provisions (SNRPs). Where this document refers to “licence conditions”, we mean this to include Railways Act 1993 licences and SNRP conditions. Further detail on the current licensing framework is set out in our [licensing guidance](#).

Why we expect to modify non-GBR licences

- 1.18 Some of the regulatory and policy requirements applying to GBR will differ from those in licences today. Wider sector arrangements will also evolve as part of rail reform, including as a result of the Passenger Watchdog's new roles and responsibilities.
- 1.19 If we do not modify licences, there may be a risk that different parts of the sector could be subject to unfair or incomplete requirements, or that unjustifiable discrepancies in the level of protection afforded to passengers, freight customers or other parties could occur.
- 1.20 ORR's proposed programme of licence modifications focuses on changes necessary to support a coherent and effective licensing regime in the context of rail reform. It is not intended to reopen all existing licence conditions or undertake a wider review of the framework. ORR will take a targeted, proportionate approach, aligning non-GBR licences with the requirements on GBR and new industry arrangements where necessary.

2. Proposed objectives, approach and emerging thinking

Objectives

- 2.1 We aim to support a coherent and effective railway licensing framework across the whole sector. Specifically, we intend to modify non-GBR licences to:
- (a) ensure that the railway is licensed in accordance with the law and ORR's statutory duties, with no gaps in accountability;
 - (b) support a consistent and high standard of service for passengers and other users across the sector;
 - (c) avoid unintended disparities between requirements on different licence holders which could result in unfairness or confusion; and
 - (d) support UK Government policy and the wider rail reform programme by giving effect to reforms which rely on ORR's licensing functions, including to give effect to new industry arrangements such as Passenger Watchdog standards.
- 2.2 Alignment will be pursued where necessary to support coherent regulation and new industry arrangements. We do not intend to weaken existing obligations that remain effective and relevant.

Question on objectives

Q1: Do you have any comments on ORR's proposed objectives in approaching modifications to non-GBR licences?

Principles and approach to potential modifications

- 2.3 In making our final decisions on non-GBR licence modifications, we will be guided by our strategic objectives and statutory duties. We will also have regard to relevant Government policy objectives, including those of the wider rail reform programme, and any relevant guidance from the Secretary of State (including any

new statutory guidance received ahead of any licence modifications). We will have regard to any relevant guidance from Scottish Ministers and will, where relevant, consider devolution arrangements more broadly. In addition, we have developed some specific principles relevant to non-GBR licence modifications. These are set out below.

Proportionality and minimising burden

2.4 We expect to consider the purpose of each licence condition, how it will work in practice and the characteristics of different licence holders (including any specific local arrangements where relevant). While we seek to pursue alignment and consistency between non-GBR licences and the GBR licence:

- **Some differences between GBR’s licence and non-GBR licences may be entirely justified as a feature of design or specific circumstances.** For example, some GBR licence requirements will be unique to GBR as a result of its specific role as directing mind;
- **Ensuring consistency should be proportionate to the purpose being achieved:** some minor differences between licences may be tolerable if the impact is not material and if the action required to achieve total alignment is not proportionate to the benefits. For example, different numbering of conditions may be tolerable if the effective requirements and likely outcomes are the same and if achieving total alignment would create unjustifiable administrative burden;

Addressing technical drafting issues or other issues not essential to achieving our objectives

2.5 Where appropriate and necessary we may use the opportunity to address known minor technical issues with licence drafting, for example to update outdated definitions and references or rectify unclear drafting.

2.6 While we will keep licences under review, as emphasised in Chapter 1, our overriding focus is on licence modifications necessary to support a coherent and effective licensing regime and the establishment of GBR.

Model licence templates and “bespoke” licence conditions

2.7 Government intends GBR to operate under a single, integrated licence and the Railways Bill creates a licensing framework which allows it to do so. For non-GBR operators, the licensing framework will continue to require separate licences for

different categories of railway asset (e.g. trains, stations, depots and networks). While we do not expect the licensing framework to change for non-GBR operators, we do expect that the content of several of the standard licence conditions is likely to change in the context of rail reform. This is discussed in more detail below.

- 2.8 ORR's established practice is to issue all licences in accordance with a standard template. We refer to these as [model licences](#). Issuing licences according to a standard template with common conditions (according to the category of railway asset) provides transparency and predictability for industry, including by allowing potential applicants to understand the regulatory requirements which will apply to their business. The use of a common model licence template also streamlines administrative and decision-making processes when issuing new licences or modifying existing licences.
- 2.9 As well as modifying existing licences to ensure coherence and give effect to new sector arrangements, we will update model licence templates to ensure appropriate requirements apply to any future licence holders.
- 2.10 Some existing railway licences do not conform fully to the model licence template. In some cases, this is for historical reasons (e.g. the licence uses an old template with different numbering or drafting) or to reflect the specific operating conditions or accountability arrangements of the licence holder. While we will aim to ensure that licences conform with the updated model licence template, we recognise that the continuation of some of these "bespoke" licence conditions is likely to be necessary.

Question on proposed principles and approach to licence modifications

Q2: Do you have any views on our proposed principles and approach to licence modifications?

Emerging thinking on the GBR licence proposition and relevance to non-GBR licences

- 2.11 Based on DfT's publications to date concerning the GBR licence and wider sector arrangements, there are several areas where it is very likely that licence modifications will be required and other areas where we currently expect broad continuity with existing arrangements. Our thinking remains high level and subject

to further policy and legislative development. As DfT's policy proposition for GBR's licence is refined, we will adapt and refine our approach as necessary.

- 2.12 The rest of this chapter highlights the areas where we expect changes to non-GBR licences are most likely to be necessary as well as areas where continuity is likely. Annex A reproduces the "heads of terms" for the GBR licence proposition published in [DfT's May 2026 policy paper](#) and includes ORR's emerging thinking on the potential relevance for non-GBR licence holders.

Areas where we anticipate modifications are likely to be necessary

Passenger Watchdog standards and liaison

- 2.13 Consumer protections relating to passenger information, complaints handling, delay compensation and accessibility are currently addressed across four separate licence conditions in the licences of station and passenger train operators.
- 2.14 The Passenger Watchdog will set and monitor passenger standards in these areas (and may set standards in new areas in future). These are intended to apply to the whole sector, not just GBR. In this context, we expect licence modifications will be required to align the requirements and protections in passenger and station operators' licences across the whole sector and to ensure that the Passenger Watchdog's standards are binding on all relevant operators.
- 2.15 DfT's May 2026 Heads of Terms for the GBR licence indicates GBR will have a single licence condition requiring it to meet consumer standards on passenger information, complaints handling, delay compensation and accessibility. It is also expected that the Passenger Watchdog will be able to set standards in new areas in future. The GBR licence proposition differs from the current model, which features individual licence conditions on passenger information, complaints handling, delay compensation and accessibility. As we expect the GBR licence condition on consumer experience to differ from current arrangements, it is likely that we will seek to modify non-GBR licences to ensure consistency and clarity across the passenger sector.
- 2.16 It may also be necessary to update licence conditions relating to liaison with the Passengers' Council (the legal name for the future watchdog) and London TravelWatch.

Rail Delivery Group (RDG) and shared industry systems

- 2.17 As stated in [a railway fit for Britain's future: government response](#) (p.48), Government ultimately anticipates GBR will take on the majority of RDG's functions. Government has also indicated that it expects GBR to have a licence condition relating to its management of network-wide industry systems and functions (see "provision of network-wide industry systems and functions" in Annex A). We also note Government's wider policy aims to reduce industry fragmentation and for GBR to act as the directing mind for the railways.
- 2.18 In this context, subject to how the transition is undertaken, it may be necessary to modify non-GBR licences to ensure sector-wide participation in GBR-managed industry-wide systems and functions and integrated passenger journeys across the network. This may include systems and functions currently covered by model licence Condition 3, "passenger rights, through ticketing and network benefits".
- 2.19 All passenger and freight licences also currently contain a licence condition requiring membership of RDG. This is unlikely to be necessary in future, given GBR's future role as directing mind and manager of industry systems and processes.

Other areas

- 2.20 In addition to the likely areas of change identified above, we understand that there are:
- (a) **Licence conditions likely to be common to both GBR and non-GBR licence holders where broad continuity with current arrangements is expected.** These include licence conditions on environmental matters, insurance against third party liability, RSSB membership, rail safety and standards, claims allocation and handling, emergency access and changes to schedules of depots and/or stations; and
 - (b) **Licence conditions which are not expected to feature in GBR's licence but which may still be relevant for non-GBR licences which currently include them.** These include conditions on payment of fees, change of control, non-discrimination, co-operation with Transport of London and station asset information.
- 2.21 As further details of the GBR licence proposition are confirmed we will consider whether any licence modifications are necessary or desirable to ensure a coherent

and effective licensing framework. This may include areas where we currently expect broad continuity with existing arrangements.

- 2.22 As noted above, there are a small number of licence holders with bespoke, non-standard licence conditions which reflect their specific operating conditions or accountability arrangements. We are not proposing to use this exercise to challenge or standardise such bespoke conditions, provided they remain relevant and compatible with the new framework.

Conditions unique to the GBR licence

- 2.23 While our intention is to align non-GBR licences with GBR's licence where appropriate, there are several conditions proposed for GBR's licence which reflect GBR's unique role as directing mind for the railway and which are unlikely to be relevant to include in other licences.
- 2.24 As such, we do not expect to modify non-GBR licences to include conditions on matters such as the retail code of practice, long-term asset stewardship, land disposal, and provision of network-wide industry systems and functions. This is similar to the position today with Network Rail's network licence, which contains a range of licence requirements which reflect Network Rail's unique role as infrastructure manager for the mainline network.

Questions on ORR's emerging thinking on GBR licence conditions and potential relevance to non-GBR licences

Q3: Do you have any feedback on ORR's emerging thinking on the potential need or desirability of changes to non-GBR licences?

Q4: Are there specific areas where alignment with the GBR licence is particularly important or where divergence may be necessary or desirable?

Q5: Do you have any other comments relevant to this discussion document?

3. Responding to this discussion document and next steps

Our approach to engaging with stakeholders

- 3.1 This document represents the first stage of our engagement on non-GBR licence modifications. Responses will inform the development of our policy approach and the design of the subsequent consultation.
- 3.2 We expect to follow with a formal policy consultation on proposed licence modifications, aligned where appropriate, with the DfT consultation on the GBR licence framework, to provide a coherent view of the overall licensing regime.

How to respond

- 3.3 ORR welcomes responses to this discussion document by 18 September 2026.
- 3.4 Responses should be submitted via [ORR's online form](#). Respondents may respond to individual questions and/or provide general comments and are not required to answer all questions. Responses may also be submitted by email to strategyandreform@orr.gov.uk.
- 3.5 ORR intends to publish responses to this discussion document and we may also share responses with DfT. Please let us know if you would prefer your response to be anonymous or if there is any sensitive information you wish to be redacted.
- 3.6 We will host an industry roundtable to allow further discussion of these policy choices. If respondents would prefer a bilateral discussion with ORR, please [contact us](#) to arrange. Feedback from these engagements will inform policy development. We plan to publish a summary of the discussions but will not attribute comments to individuals or organisations.
- 3.7 This document does not seek views on underlying Government policy. Stakeholders should engage with the relevant consultation processes on the substance of those specific policy proposals, including the content of the GBR licence (led by DfT) or the proposed Retail Code of Practice (led by ORR). Outcomes from those processes will inform ORR's approach to non-GBR licence modifications.

- 3.8 We will continue to work closely with DfT and other relevant bodies to ensure that our approach to non-GBR licence modifications is aligned with wider policy development and that stakeholder engagement is appropriately coordinated. DfT will also be invited to attend our roundtable.

Next steps

- 3.9 We will continue our policy development informed by the responses to this discussion document and the stakeholder events. Aligned with DfT's policy consultation on GBR's licence, in Autumn 2026 we plan to undertake a formal consultation on licence modifications before progressing to the statutory modification process. Our policy consultation will be informed by relevant responses to this discussion document and further detail on DfT's policy proposition for GBR's licence. Dependent on finalisation of the GBR licence in time to allow ORR to complete the statutory consultation process, we aim to notify all non-GBR licence holders of the outcome of the statutory licence modifications process ahead of GBR Day 1, when GBR's licence becomes operational.

Annex A: Emerging thinking on GBR licence conditions and potential relevance for non-GBR licences

Proposed GBR licence condition	DfT's summary of intent (as outlined in its May 2026 policy paper on GBR's licence)	ORR's initial view on potential relevance for non-GBR licences
Information requirements for ORR	A condition that means GBR must provide ORR with information that ORR reasonably requires to exercise its functions.	"Information for ORR" is not a standard licence condition in model licences. We expect to consider whether our information gathering powers over non-GBR licence holders are sufficient or whether it is necessary to introduce a specific licence condition relating to provision of information that ORR reasonably requires to mirror the condition proposed for GBR's licence. A small number of network licence holders currently have an "information for ORR" licence condition in their licences. We will consider whether any modification is required to align these with GBR's licence.
Consumer experience	A condition that requires GBR to meet consumer protections (passenger information, complaints handling, compensation, accessible travel policy) aligned to Passenger Watchdog Standards. The Passenger Watchdog's role will be to create and update new standards in time, subject to consent by ORR and the Transport Secretary.	Consumer protections relating to passenger information, complaints handling, delay compensation and accessibility are currently addressed across four separate licence conditions in the licences of station and passenger train operators. The Passenger Watchdog will set and monitor passenger standards in these areas (and may set standards in new areas in future). In this context, we expect licence modifications are likely to be required to align the requirements and protections in passenger and station operators' licences across the whole sector and to ensure that the Passenger Watchdog's standards are binding on all relevant operators.

Proposed GBR licence condition	DfT's summary of intent (as outlined in its May 2026 policy paper on GBR's licence)	ORR's initial view on potential relevance for non-GBR licences
Stakeholder engagement	A condition that requires GBR to ensure it undertakes effective, proportionate stakeholder engagement and to be responsive to stakeholder needs. This would include a requirement for GBR to develop, publish and comply with a policy setting out the approach it will follow in engaging stakeholders, including groups representing disabled people as part of its overall stakeholder engagement approach.	Stakeholder engagement is not a standard licence condition and for this reason we do not expect any modifications to be necessary to any licences following the “model” licence format. Along with Network Rail, a small number of infrastructure managers with network licences currently have licence conditions relating to stakeholder engagement. On a case-by-case basis and considering any other relevant accountability arrangements, we will consider whether any modifications are necessary or desirable to align these stakeholder licence requirements with those in GBR's licence.
Retail code of practice	A condition that requires GBR to adhere to a retail code of practice, which will be owned and managed by the ORR. The code will set out a range of safeguards to manage any conflicts of interest in GBR operating both as a retailer, while also managing central retail industry functions that enable all retailers to operate in the market.	GBR is expected to have a unique role as the manager of retail industry functions. For this reason, we do not expect any corresponding licence condition to be necessary for non-GBR licences.
Long-term asset stewardship	A condition focused on ensuring GBR delivers long-term asset stewardship and that assets are managed efficiently to maintain their longevity and long-term value. A key focus will be GBR delivering annual progress against agreed asset stewardship outcome indicators as set out in GBR's business plan, with appropriate regard to the funding available.	Long-term asset stewardship is not a standard licence condition in any licence and we expect it is unlikely to be relevant to any non-GBR licence.

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Proposed GBR licence condition	DfT's summary of intent (as outlined in its May 2026 policy paper on GBR's licence)	ORR's initial view on potential relevance for non-GBR licences
Land disposal	A condition that requires GBR to develop and comply with a land disposal policy. The purpose is to ensure that GBR's approach to land disposal protects land that may have reasonably foreseeable railway use, whilst recognising GBR's wider role in the rail system including its role ensuring efficient future use of the railway estate. The condition would include a requirement on GBR to consult with affected stakeholders as needed before land is disposed, with the ORR ensuring GBR complies with the terms of its land disposal policy.	Land disposal is not a standard licence condition in any model licence and is unlikely to be relevant for non-GBR licences.
Environmental matters	A condition that will mean GBR must maintain an environmental policy and embed outcomes in decision-making. The purpose is to ensure that GBR maintains a clear, consistent approach to protecting the environment across the network and its operations, aligning it with equivalent obligations on other licence holders.	All licences currently contain an environmental matters licence condition. We expect this condition to be retained, and will consider whether any modifications are necessary or desirable to ensure alignment with environmental requirements on GBR.
Insurance against third party liability	A condition that will require GBR to hold appropriate third-party liability insurance like other licence holders. This will give third parties confidence that GBR will be able to cover any damages it might cause.	All licences currently contain a condition requiring insurance against third party liability. It is likely that insurance requirements will continue to be relevant for non-GBR operators.

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Proposed GBR licence condition	DfT's summary of intent (as outlined in its May 2026 policy paper on GBR's licence)	ORR's initial view on potential relevance for non-GBR licences
Claims and allocation handling	A condition that means GBR must participate in industry claims and liability sharing arrangements. This is common across all licence holders today, who must all be part of the same scheme for it to work.	All licences currently contain a licence condition relating to claims and allocation handling. We expect this condition will continue to be relevant for non-GBR operators.
Provision of network-wide industry systems and functions	A condition that relates to the delivery of network-wide functions and systems, including to non-GBR operators (such as open access, devolved and devolved regional services). The condition may also set out any controls that will be put in place, for example in relation to information handling, or dispute resolution.	GBR is expected to have a unique role in the sector delivering network-wide systems and functions. For this reason, we do not expect any directly corresponding licence condition to be necessary for non-GBR licences. However, it may be necessary to modify non-GBR licences to ensure continued sector-wide participation in GBR's industry-wide systems and functions.
Liaison with Passenger Watchdog and London TravelWatch	A condition requiring GBR to cooperate with both the Passenger Watchdog and London TravelWatch. This will support GBR's performance against agreed service quality measures, and to help address passenger issues or concerns raised through the Watchdog's investigations or insight.	Passenger and station licences currently contain a condition on liaison with the Passengers' Council (currently Transport Focus and the legal name of the future Passenger Watchdog) and London TravelWatch. In the context of the new role of the Passenger Watchdog, it is likely that the requirements on all passenger and station operators in relation to co-operation with the Passenger Watchdog will change. Therefore it may be necessary to modify passenger and station licences to ensure alignment with GBR's licence and to reflect the role of the Passenger Watchdog.

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Proposed GBR licence condition	DfT's summary of intent (as outlined in its May 2026 policy paper on GBR's licence)	ORR's initial view on potential relevance for non-GBR licences
Safety and Rail technical standards	A condition to support continuity of the current pan-industry safety standards framework when GBR is stood up.	Most licences currently have a condition on safety and standards, and most train operator licences have a condition requiring membership of RSSB. We expect these conditions will continue to be relevant for non-GBR operators.
Emergency access	A condition that means GBR must ensure timely station/depot access for relevant parties in emergencies.	All station, light maintenance depot (LMD), and network licences currently have a condition on emergency access. We expect this condition will continue to be relevant for non-GBR operators.
Reporters	A condition that means GBR must engage and co-operate with Independent Reporters when requested by ORR. Reporters can be used to provide third party scrutiny and expertise, or if needed to inform investigation or resolution of concerns between ORR and GBR.	This is not a standard licence condition and is unlikely to be relevant for non-GBR licences.
List of stations & depots of which GBR is the operator	A condition that lists the stations and light maintenance depots for which GBR is responsible. The list may be set out as an annex to the licence to help avoid a need for the licence to be updated if GBR's ownership of stations or depots changes.	All station and LMD licences contain a licence condition setting out a procedure for maintaining a schedule of facilities the licence holder is licensed to operate. We will consider whether any modifications are necessary or desirable to ensure alignment with the relevant requirements on GBR.

Annex B: Consolidated list of questions

Q1: Do you have any comments on ORR's proposed objectives in approaching modifications to non-GBR licences?

Q2: Do you have any views on our proposed principles and approach to licence modifications?

Q3: Do you have any feedback on ORR's emerging thinking on the potential need or desirability of changes to non-GBR licences?

Q4: Are there specific areas where alignment with the GBR licence is particularly important or where divergence may be necessary or desirable?

Q5: Do you have any other comments relevant to this discussion document?



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