

Stephanie Tobyn
Director of Strategy, Policy and Reform



Tricia Williams
Managing Director
Northern Trains
By email only

8 September 2026

Dear Tricia,

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

I am writing to confirm that ORR is satisfied Northern has completed all actions set out in its disability awareness training improvement plan and made satisfactory progress against its reparations package, both submitted to ORR on 17 December 2025. As such we are reverting to business-as-usual monitoring of Northern's obligations related to disability awareness training.

Context

On 3 March 2026 ORR published its [decision](#) that Northern had failed, and was failing, to comply with commitments made in its published Accessible Travel Policy (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.

ORR did not impose an enforcement order or financial penalty because Northern agreed to take, and was taking, all such steps as appeared appropriate to ORR for the purpose of securing compliance with its ATP commitments relating to disability awareness training.

Northern submitted an improvement plan that ORR considered to be comprehensive and well-targeted at tackling systemic issues relating to governance, oversight and delivery of disability awareness training. In addition, Northern offered a package of reparations with an estimated value of £550,000.

ORR has been monitoring Northern's delivery of its improvement plan and reparations package.

Engagement with Northern while monitoring delivery of commitments

Northern engaged constructively with ORR throughout the investigation process and during the on-going monitoring of its plan and reparation package.

Northern was pro-active in providing regular monthly progress updates since March 2026 and provided appropriate evidence to demonstrate its progress and its completion of actions.

Assessment of Northern's delivery of its disability awareness training improvement plan

Northern set out 23 actions in its improvement plan that were grouped into four themes intended to address the issues identified during the investigation. The themes were:

- Review governance, controls and reporting
- Define role-based training requirements
- Address retrospective gaps
- Update induction, onboarding and refresher training

All actions were completed on time and satisfactory evidence was provided.

Northern has demonstrated that there are now robust governance structures in place to manage training delivery. Newly created internal documents outline the key principles around training management including oversight, reporting, assurance processes, and importantly, accountability.

Northern's new internal reporting dashboard is a key enabler for tracking and monitoring training requirements of individuals and informs the business-as-usual training cycle. Delivery of training and tracking of attendance, completion rates and evaluations are now in place as business-as-usual processes.

Assessment of Northern's delivery of its reparation package

Northern's suite of reparation initiatives was offered as an acknowledgment of its responsibility and was intended to represent a commitment to repair and build a foundation for improved standards of customer service delivery. The package included a diverse mix of initiatives, including activities to:

- Support the delivery and impact of training e.g. people resources to accelerate delivery of the improvement plan, an internal awareness campaign and additional laptops for e-learning.

- Provide assurance on training outcomes e.g. third-party audit, additional mystery shopping exercises in each rail period.
- Provide direct passenger facing activities e.g. a travel offer for disabled passengers.
- Strengthen the available training offer beyond its regulatory commitments e.g. additional face to face lived experience training for 150 staff.

We worked with Northern and relevant stakeholders including Transport Focus and Disabled Persons Transport Advisory Committee (DPTAC) to finalise the travel offer for disabled passengers.

We assessed Northern's proposed travel offer and provided feedback to highlight risks around the short duration of the offer, and eligibility not being sufficiently targeted.

Northern responded well to the feedback and evolved its initial proposal into a much more robust offer, targeted at passengers more likely to have had a poor experience and significantly extended the timeframe over which the offer would be valid.

All initiatives that were scheduled for delivery by the end of July 2026, were implemented on time and satisfactory evidence was provided. Two remaining initiatives have future completion dates and are currently progressing well.

We will continue to monitor delivery and outcomes of the two on-going initiatives; the travel offer for disabled passengers which is due to be completed by end of November 2026 and the delivery of the additional face to face training by March 2027.

Next steps

ORR is satisfied Northern has completed all actions set out in its disability awareness training improvement plan and made satisfactory progress against its reparations package, both submitted to ORR on 17 December 2025.

ORR has reverted to business-as-usual monitoring of Northern's delivery of disability awareness training via quarterly data submissions.

It is imperative that Northern do not lose momentum with its new governance and processes for delivery and oversight of disability awareness training and ensure they remain effective through ongoing continuous improvement.

As part of our business-as-usual monitoring we expect Northern to be proactive in advising us of any potential issues arising which could impact its ability to meet its requirements on disability awareness training or deliver its remaining reparations

activities. If such issues materialise, we will review the situation and may consider further regulatory intervention if required.

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

Yours sincerely

Stephanie Tobyn

Director of Strategy, Policy and Reform