



Equality Information and Objectives 2025

Consumer policy

ORR's work across Consumer Policy is relevant to the protected characteristics of **disability**, **age**, and **pregnancy and maternity**, which all have particular relevance to mobility, transport, and rail. Our work also shows due regard to **the three aims of the general equality duty**. ORR's annual consumer report summarises our broader consumer policy work, much of which comes from our role in setting and enforcing operators' licence requirements.

Accessible travel for all passengers

We require operators to develop, publish, maintain, and comply with Accessible Travel Policies (ATPs). This work contributes to eliminating unlawful discrimination and advancing equality of opportunity.

We require train and station operators to establish and comply with an ATP, and we approve and monitor compliance with these. ATPs must meet the requirements of our ATP guidance. When operators submit ATPs for approval, we will assess against this guidance and publish decision letters which summarise any issues raised during the process. We also oversee an annual review process to ensure operators' ATPs take any changes into account. Once an ATP is approved, we use monitoring, bespoke research and regular engagement to monitor operator compliance.

Since 2017 this has included an annual survey of satisfaction with passenger assistance which, alongside other research, establishes an evidence base for interventions. We also carry out ad-hoc studies, reviews, and audits. During 2024-2025, this included studies on communication between stations when delivering assistance and the reliability of station help points.

Passenger complaints to train companies

We require train and station operators to establish and comply with a complaint handling procedure. This work contributes to **eliminating unlawful discrimination** by ensuring passengers can complain about how they have been treated as someone with a protected characteristic. Furthermore, it contributes to ensuring that all passengers can claim delay compensation, including those with **protected characteristics**, by requiring the process to be accessible.

Operators' complaints handling procedures must comply with our Complaints Code of Practice. As part of its development we undertook a regulatory impact assessment to consider its potential impact on all passengers. We collect and monitor data on passenger satisfaction with operators' complaints handling and this includes an option for the passenger to disclose whether they have a disability and whether this had an impact on their experience, which can help us understand if disabled passengers are experiencing different outcomes to non-disabled passengers. We require operators to make appropriate and proportionate provision for passengers who need assistance in engaging with a complaints process and have undertaken research into disabled passengers' experiences of complaints handling by operators.

We require operators to publish information annually on improvements being made, including an assessment of passenger experience of the complaints process – noting their duty under the Equality Act 2010. As of this year (2025), we require train operators to specifically consider the needs of disabled passengers in their annual reports. We expect them to have reviewed their complaint processes, pinpointed the gaps, and taken steps to implement the good practice outlined in our research. We will be scrutinising what they do.

Delay compensation

We require train operators to comply with the Delay Compensation Code of Practice. This work contributes to ensuring that all passengers can claim delay compensation, including those with **protected characteristics**, by ensuring the process is accessible.

ORR published the Code of Practice, having worked closely with stakeholders in its development. The process also included production of an Equality Impact Assessment. The Code of Practice requires operators to have claim procedures in place that are accessible to passengers with protected characteristics. It also establishes a reporting procedure for annual updates about

improvements, which may include steps taken to improve accessibility. A monitoring framework now includes a self-assessment by operators with their compliance with key qualitative requirements, including the accessibility of the claim process.

Consumer law

ORR enforce certain consumer protection legislation under Chapter 3 of Part 3 of the Digital Markets, Competition and Consumers Act 2024 (DMCCA24). Our consumer law enforcement gives due regard to Equality Act 2010, and contributes to eliminating unlawful discrimination, advancing equality of opportunity, and fostering good relations.

Our powers under Part 3 of DMCCA24 can be used only where an infringement harms the collective interests of consumers. The breach can affect consumers generally or a group of consumers, and this can include a group sharing certain characteristics, including protected characteristics such as disability, age, or pregnancy and maternity. In exercising our consumer enforcement functions, we will give regard to those impacted by the offending act or behaviour. Any relevant evidence taken into consideration will be recorded within our corporate decision-making documents.

Sponsorship of the Rail Ombudsman

We require train and station operators to become and remain a member of the relevant alternative dispute resolution scheme. The Rail Ombudsman can consider and make binding decisions on unresolved complaints between passengers and operators who are members of the Rail Ombudsman scheme. This work contributes to eliminating unlawful discrimination by ensuring passengers can complain about how they have been treated as someone with a protected characteristic. Furthermore, it contributes to ensuring that all passengers can claim delay compensation, including those with protected characteristics, by requiring the process to be accessible.

ORR has contracted a range of requirements for the provider of the Rail Ombudsman service, including those relating to accessibility. The service must be fully accessible and seek to improve upon current standards for accessible communication, and the Rail Ombudsman must make best endeavours to ensure that its Board shall include at least one individual with lived experience of disability. Evidence of these requirements being met is documented within our contract

management plan. Through ongoing contract management of the Rail Ombudsman and associated actions and outputs of ORR-commissioned testing and research, we seek to work with the Rail Ombudsman to enhance the accessibility and usability of its service through continuous improvement plans.