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 – and in 2025 was the basis for our first report. This resulted in us requiring two operators to establish action plans to drive improved performance, which are now holding the operators to account against.

We also carry out ad-hoc studies, reviews, and audits. This has recently 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 2025, we required 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 through their licence to become and remain a member of the rail alternative dispute resolution scheme, which is the Rail Ombudsman. 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 providing passengers with an independent route to escalate complaints about treatment related to a protected characteristic. This includes concerns about accessibility and failures by train and station operators to meet the commitments set out in their Accessible Travel Policies, such as failing to provide passenger assistance, inadequate access to facilities, or other barriers that prevent disabled passengers from accessing rail services. The Rail Ombudsman independently investigates and resolves these complaints, helping to identify and address instances of unequal treatment, improve compliance with accessibility obligations, and

promote fair, inclusive and equitable access to the railway network for all passengers.

ORR has also contracted a range of requirements and obligations for the provider of the Rail Ombudsman service to meet, including those relating to accessibility. The service must be fully accessible and demonstrate a commitment to continuous improvement in accessible communication standards. In addition, the Rail Ombudsman must use its best endeavours to ensure that its Board includes at least one individual with lived experience of disability. Compliance with these requirements is documented within the contract management plan and verified annually through ORR's audit process.

- ← Previous Decision making
- → Next Station and rolling stock accessibility