Equality Information and Objectives 2025

ORR is committed to advancing the aims of the Equality Act 2010, both as an employer and as a regulator. The following pages set out our Equality Objectives for 2024-2028 and our Equality Information, providing an overview of the work we are currently doing across our rail and road responsibilities, as well as external communications and corporate activities.

Both are required under the Public Sector Equality Duty (PSED).

Our Equality Objectives

1. ORR will continue to ensure that operators take steps to improve the reliability of assistance provided to disabled people and others with reduced mobility.
2. ORR will use its role as sponsor of the Rail Ombudsman to improve the accessibility of the service for users with disabilities and additional support needs.
3. ORR will strive to make all digital content materials as accessible as possible.
4. ORR will make full use of our capability to address the specific needs and challenges faced by individuals with protected characteristics within the framework of health and safety regulations, interoperability standards, and authorisation processes for the rail sectors.

- → Next Decision making

Decision making

Given the nature of ORR's responsibilities in the sectors we regulate, the primary area of focus for us is on people with reduced mobility, which has relevance to the protected characteristics of **disability**, **age**, and **pregnancy and maternity**. Under section 149 of Equality Act 2010, ORR must give "due regard" to the **three aims of the general equality duty** within its regulatory decision making.

As part of our ongoing commitment under our Diversity and Inclusion Strategy 2024–2027, we consider the potential impact of a new or revised policy on people who share a protected characteristic. We also keep a record of any Equality Impact Assessment to demonstrate that we have discharged our Public Sector Equality Duty (PSED) obligations. To ensure we are considering PSED in all our decision making, we have built checks into our Board/committee paper template and monitor policy papers going to executive and regulatory committees. We also have internal guidance on Equality Impact Assessments, with a template available to improve consistency.

Where our regulatory responsibilities relate to different duties defined in a licence or legislation, we ensure a joined-up approach to decision making. For example, we have established an 'Accessibility Hub' comprised of a group of expert leads which meets quarterly to coordinate cross-office input into matters relating to accessibility.

- ← Previous Equality Information and Objectives 2025
- → Next Consumer policy

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.

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- → Next Station and rolling stock accessibility

Station and rolling stock accessibility

ORR's work in monitoring compliance with the required standards is relevant to the protected characteristics of **disability**, **age**, and **pregnancy and maternity**, which all have particular relevance to mobility, transport, and rail. Ensuring compliance contributes to **eliminating discrimination** by removing or minimising disadvantages and meeting the needs of people sharing protected characteristics. It also **advances equality of opportunity** by enabling people with certain protected characteristics to use the railway.

Station standards

The Design Standards for Accessible Railway Stations (Station Code) is intended to ensure that any infrastructure work at stations makes railway travel easier for disabled passengers. While Department for Transport and Transport Scotland own and author this, and grant or reject dispensation applications for specific projects, ORR is responsible for monitoring compliance. This is a licence requirement for station operators.

We seek assurance from Network Rail that it has appropriate governance processes in place to ensure compliance. As part of our routine monitoring of Network Rail renewal projects we gather information at the appropriate stage of project planning on compliance. We investigate reports of

station operators not complying with the Station Code and will take action to ensure compliance. We will contribute to the Department for Transport-led revision of the Station Code.

ORR has enforcement powers under the Railways (Interoperability) Regulations 2011 (RIR 2011) with respect to the technical standards for railway station accessibility requirements defined in the Accessibility National Technical Specification Notice (ACC NTSN). This is to support a consistently accessible experience for all passengers and staff, including those with disabilities and reduced mobility defined in the NTSN.

We only grant authorisation where the applicable accessibility standards have been complied with, and we retain evidence of compliance for decisions on authorisations. During engagement with applicants, we promote equality of treatment and draw attention to the potential applicability of Equality Act 2010 to the future use of the infrastructure subsystem in question.

Rolling stock standards

ORR has enforcement powers under RIR 2011with respect to the technical standards for rail vehicle accessibility defined in the Accessibility National Technical Specification Notice (ACC NTSN) and The Rail Vehicle Accessibility Regulations (RVAR).

Interoperability authorisations

We only grant authorisation where the applicable accessibility standards have been complied with, and we retain evidence of compliance for decisions on authorisations. During engagement with applicants, we promote equality of treatment and draw attention to the potential applicability of Equality Act 2010 to the future use of the subsystem in question. We also undertake reactive monitoring and assurance of compliance with the standards, making sure vehicles are accessible in compliance with the law.

As part of our engagement with duty holders under RIR 2011, we give accurate and timely advice on exemption, deviation, dispensation, and derogation processes. The processes for these modifications to standards fall to other bodies – we are a consultee for the Department for Transport's exemption, deviation, and derogation processes, although ORR's input is in respect of health and safety implications and the effect on ORR's ability to exercise enforcement powers.

Standard-setting

In respect of setting accessibility requirements, ORR has no formal role. Where we need to take a decision relating to compliance with accessibility standards we consult the Department for Transport, which in turn may seek the view of the statutory Disabled Persons Transport Advisory Committee (DPTAC). We record this interaction in the authorisation file.

Complaints

We respond to all complaints that relate to matters covered by the accessibility legislation that we enforce using Health and Safety at Work etc Act 1974 powers and use any information provided to establish priorities for follow-up.

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- → Next Regulation of Network Rail

Regulation of Network Rail

ORR's work in this area has the potential to impact all **protected characteristics**.

Economic regulation

Funders (Department for Transport and Transport Scotland) decide funding and priorities for Network Rail infrastructure. These priorities may impact people with **protected characteristics**, and ORR's periodic reviews consider whether Network Rail's plans will deliver against these priorities in an efficient way and confirm expectations for the five-year funding period. ORR does not determine whether funders have set the 'right' priorities. We scrutinise and challenge Network Rail's draft business plans and monitor its performance against the commitments made in Network Rail's Delivery Plans over the Control Period. We seek assurance that workplans are compliant with relevant accessibility standards in legislation or licence.

Evaluation of Network Rail's performance and expenditure is included within our routine reporting on Network Rail. We review Network Rail's Strategic Business Plan (at national and regional level) for commitments on accessibility-related outputs, and this includes obtaining assurance that

Network Rail gives due regard to the implications for inclusion and accessibility when planning and prioritising its asset management activities for infrastructures under the given funding. The most recent periodic review secured commitments from Network Rail on several areas relevant to accessibility, including on lift performance reporting and compliance with the Station Code.

Access for All funding

ORR sits on the board for the Access for All programme. Access for All contributes to **promoting equality of opportunity** by using Department for Transport funding specifically for accessibility initiatives at stations. **Disability**, **age**, and **pregnancy and maternity** have particular relevance to such projects. ORR's role is to scrutinise whether Network Rail is using Access for All's funds appropriately and achieving the programme's stated objectives, however our role does not include selecting which projects are funded.

The programme board monitors governance of Access for All, and any issues are reported in the Network Rail Annual Assessment. The list of stations where improvements were funded during Control Period 6 is detailed on GOV.UK, with some of these stations still in delivery. Fifty stations have been selected for initial feasibility work in Control Period 7 and if successful these will be taken forward as part of the Access for All programme.

Land disposal

Under Condition 17 of its network licence, Network Rail are required to refer a land disposal to ORR for consent. Sometimes these may impact pre-existing facilities (e.g. disabled parking), therefore we must consider our duty to **promote equality of opportunity**. In such cases, **disability**, **age**, and **pregnancy and maternity** may be relevant. For every submission we expect Network Rail to consult relevant stakeholders, with passenger representative organisations representing the views of individuals using the railways.

Our land disposal guidance refers to our duties under Equality Act 2010. When assessing submissions, we will check for issues relating to equality and record these in our casework notes, consider the associated views, issues, and impacts, and have regard to them in reaching a decision. All land disposal casework is stored electronically.

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- → Next Railway safety

Railway safety

Disability, **age**, and **pregnancy and maternity** are protected characteristics with particular relevance to railway safety. Our regulatory work contributes to **eliminating discrimination and promoting equality** by ensuring the railway is safe to use for groups sharing protected characteristics. ORR's annual health and safety report summarises our work in this area.

Enforcement

The **protected characteristics** of workers, rail users and members of the public are taken into account where appropriate. Our Enforcement Management Model (EMM) and Enforcement Principles also reflect the effect of protected characteristics on safety risk when discussing the strategic impact of any proposed enforcement action on vulnerable groups. The protected characteristics are mentioned in the EMM guidance on strategic factors. When developing new policies or procedures, we consider groups with protected characteristics when selecting stakeholder consultees and take their responses into account, recording how this has been done.

Any investigation decisions give due regard to the effect upon groups sharing protected characteristics by requiring the application of the EMM as part of the decision-making process. We respond to all complaints that relate to matters covered by the accessibility legislation that we enforce using Health and Safety at Work etc Act 1974 powers and follow up breaches of legal requirements. Improvement notices, prohibition notices and prosecutions will refer to equality issues where relevant, again through the application of the EMM.

Accident and investigation

We have a policy on mandatory investigations of certain types of incidents and follow up recommendations from Railway Accident Investigation Branch. When investigating incidents, accidents, and complaints we take **protected characteristics** into account if relevant as a reasonable line of inquiry.

Where appropriate, equality analysis will be included when following up recommendations and as action is taken. If relevant, we will record our findings in the investigation report and take action as

necessary.

Guidance

We are committed to ensuring that our policies and guidance promote equality of opportunity and reflect the diverse needs of the communities we serve. Our approach is to seek the input and views of groups sharing **protected characteristics** during the development of policies and guidance. This helps us identify and consider any specific impacts on those groups, ensuring their needs are addressed. Where possible, we use this input to actively advance equality of opportunity through our decisions and recommendations.

When reviewing existing or developing new guidance equality is considered at an early stage, and we use equality impact assessments to identify any areas of concern where appropriate.

Examples of our published guidance, which reference consideration of groups who share protected characteristics, include:

- Principles for managing level crossing safety
- Railway safety principles on driver controlled operation
- Goal-setting principles for railway health and safety
- ORR's health and safety crowding position statement

Inspections

Inspection procedure and practice pays explicit attention to the safety of groups sharing **protected characteristics**, and specifically to the potential impact on them. Assurance of risk assessment procedures ensures that that groups sharing protected characteristics are included. Any enforcement action arising from inspection activity will be subject to the application of the EMM referenced above.

Where relevant, any concerns are recorded within a case management system and are acted upon where appropriate. Any systemic concerns are reported in an annual health and safety report and raised with industry via the Railway Industry Health and Safety Advisory Committee.

Safety certification

People with all **protected characteristics** may seek safety certificates or authorisations. It is important to ensure that regulation and certification do not unduly discriminate against groups sharing protected characteristics, and this can contribute to **eliminating discrimination** and **promoting equality of opportunity**. To help in **fostering good relations** it is important to explain cases of lawful discrimination.

Certificates and authorisations are issued in accordance with the Railways and Other Guided Transport Systems (Safety) Regulations 2006 (ROGS) guidance, which includes specific references to equality. Equality analysis is included in regulatory impact assessments.

Train driving licences

ORR is responsible for issuing licences to drivers and keeping the national register of licences. This can be relevant to people with all **protected characteristics**. Our work in this area contributes to **eliminating discrimination** by ensuring that groups sharing protected characteristics are not subject to unlawful discrimination and helps in **fostering good relations** by ensuring any lawful discrimination is justified where appropriate.

As part of this work, we review operators' arrangements, such as their training and examination, medical examination, and monitoring arrangements for drivers. These reviews can identify any equality concerns. The conditions for a train driving licence are set out in legislation and include specific medical standards (e.g. vision and hearing requirements which drivers are examined against by doctors who are registered by ORR).

We issue guidance and keep a register of each licence we issue. The Department for Transport published a Post Implementation Review (PIR) report in 2023 which recommended that the regulations for train driving licences and certificates be reviewed. ORR is supporting that review and any changes to the regulations will include an equality impact assessment.

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- → Next Highways

Highways

Our monitoring of National Highways can affect its delivery and can therefore have an impact on those with the protected characteristics of **disability**, **age** and **pregnancy and maternity**, which have particular relevance to mobility and transport.

The Department for Transport sets requirements for National Highways in the Road Investment Strategy, including the performance specification, and the scope and size of ring-fenced funds. The Secretary of State may also issue directions and guidance to National Highways. ORR is responsible for monitoring National Highways' delivery of and compliance with such requirements.

When developing policies, we record how we take equality into account. Our overall approach to holding National Highways to account is detailed in this policy.

- ← Previous Railway safety
- → Next External communications

External communications

Under the Public Sector Bodies (Websites and Mobile Applications) (No.2) Accessibility Regulations 2018 ORR is required to ensure its website and published documents are accessible. **Disability** and **age** are relevant to this, and it supports in **eliminating indirect discrimination**.

ORR's external website (orr.gov.uk) is managed in line with its published accessibility statement. This was originally prepared in 2019 but is regularly reviewed, most recently in March 2024. Our website is periodically tested to ensure it meets required standards and this was also done in March 2024. It is currently partially compliant with the Web Content Accessibility Guidelines version 2.2, with a rating of AA. Alt text is provided on website and social media imagery, while a transcript is available for audio and video content with captions provided on the latter.

External documents are accessible to enable them to be understood by as many people as possible. Staff can refer to internal guidance on producing accessible reports and plain English is encouraged through the ORR style guide. Word and an HTML web content templates facilitate this. Guidance is also available for external suppliers and is embedded in procurement contracts. ORR's digital team undertake accessibility checks on documents before they are published. Communications staff responsible for the above are trained in accessible communications.

- ← Previous Highways
- → Next Corporate activities

Corporate activities

Our actions in this area contribute to **eliminating unlawful discrimination, advancing equality of opportunity**, and **fostering good relations**, and can relate to **all protected characteristics**.

External statutory reporting

We are required by statute to publish **protected characteristic** information, including on the gender pay gap, recruitment, and the Civil Service People Survey.

Employee data is maintained in ORR's HR system to ensure data creditability when submitting data returns and producing data analysis for internal and external stakeholders. New starters complete a new starter form, and we have now enabled employees to update and declare their information themselves via the HR system. External reports are published on GOV.UK.

Review of people policies

People policies are kept under review to ensure they are fair, transparent and are effective in **eliminating unlawful discrimination**.

They are reviewed and updated in line with changes in legislation, case law or good practice. We may identify procedures that requires either a separate equality impact assessment or specialist support. Any changes updated and shared on the intranet and communicated to staff where relevant.

Guidance and training

We provide guidance and training to support a respectful and inclusive working environment, and to tackle abrasive behaviour, bullying, harassment, and discrimination.

This includes updated guidance on sexual harassment, the development of a sexual harassment risk assessment, Training materials and resources are reviewed regularly to ensure they reflect

current legislation and best practice.

Recruitment and onboarding

We ensure our recruitment process is fair, transparent, and meet the **three aims of the general equality duty**.

This is demonstrated through our approach to reasonable adjustment, selection, data from the pre-employment questionnaire, Occupational Health, and use of a workforce adjustment passport. We will act on requests for reasonable adjustment and follow through with internal processes. We report on recruitment diversity data quarterly.

Organisational benchmarking

ORR has the *Disability Confident Employer* charter mark and a Bronze Award from *Employers Network for Equality & Inclusion* for embedding diversity and inclusion. These demonstrate to members of the public, stakeholders, potential job applicants and current employees that we go beyond our corporate obligations in meeting the **three aims of the general equality duty** outlined above in our recruitment, employment, and support for employees. The criteria and action plans for the charter marks and awards help shape and influence the implementation of our Diversity & Inclusion Strategy and other HR practices.

We receive reports and feedback from external stakeholders confirming that we are meeting the standards expected, enabling us to use the logo in all our internal and external branding.

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