Consultation on Accessible Travel Policy (ATP) Guidance redress requirements: Decision document (HTML)

Executive summary

This document presents the outcome of the ORR consultation published in May 2025, on the Accessible Travel Policy (ATP) Guidance redress requirements.

Redress is a way that operators can seek to put things right for a passenger where they have failed to deliver assistance as booked. For all redress claims submitted by a passenger, operators must provide an explanation of what went wrong, what steps they have taken to prevent the failure from happening again and an appropriate remedy. This could take a variety of forms, such as an apology, a gesture of goodwill, and/or financial compensation.

The consultation sought views on a specific proposal to require operators to determine appropriate redress on a case-by-case basis, which is currently recommended as good practice. We did not propose any other changes to the ATP Guidance.

This proposal meant that operators would need to remove any provisions from their ATPs that cap or appear to be capping monetary compensation just to the ticket price or a multiple thereof.

The consultation ran from 30 May to 11 July 2025, receiving 30 responses from members of the public, train operators, passenger groups, disabled passenger organisations, Transport Focus, Transport for Greater Manchester, the Equality and Human Rights Commission and the Rail Ombudsman.

Consultation responses

Respondents expressed broad support for always adopting a case-by-case approach to determining appropriate redress, because it is felt to be the most effective way that operators can respond to the individual circumstances of each case. However, some concerns were raised around how to achieve consistency when a case-by-case approach is applied in practice.

Respondents also raised broader issues on our redress requirements, including, specifically, calls for there to be some form of guidance or framework to determine appropriate redress, challenges to expand the scope of our redress requirements and review the ownership of redress claims, and calls to simplify and streamline the redress process. We are committed to undertaking further work to explore these wider issues raised and we will engage further with the relevant stakeholders to do so.

As part of the wider issues raised, this document also clarifies our role in relation to guidance on financial redress levels and provides a view on the application of the Vento bands to redress.

ORR decision

We will implement the proposed case-by-case change to the ATP Guidance and have published updated ATP Guidance alongside this decision document. In practice this means a one-word change to paragraph A8.1 so that the form and, where appropriate, value of redress "must" be determined on a case-by-case basis, rather than "may".

This decision underlines ORR's commitment to improving the experiences of older and disabled people travelling by rail. It should improve fairness, proportionality and passenger confidence with the redress process. It will also promote operators' increased learning and continuous improvement which can support them in preventing future cases of failed assistance.

Next steps

Case-by-case approach

Following the issue of our decision, we will write to all operators to request that they review their ATP content on redress and make any appropriate amendments to implement the case-by-case approach.

Operators will need to give effect to the case-by-case approach and where appropriate remove any provision from their ATPs that cap or appear to be capping monetary compensation just to the ticket price or a multiple thereof. Where financial compensation forms part of redress, we recognise that a refund or partial refund of the ticket price could be appropriate, depending on the circumstances of the case, and this remains a decision for the relevant train operator. Operators will be required to move at a swift pace to complete this review, and to submit any proposed changes to ORR.

We will also review how we monitor operators' activities in relation to redress, including reviewing the redress core data we collect from all operators.

Wider issues

We will undertake further work to explore the wider issues raised, including whether there is a need for further guidance/a framework for determining appropriate redress, the scope of our current redress requirements, the ownership of redress claims, and the process for handling redress claims. The output of this work could take a number of forms, for example a progress update, a discussion document or a consultation on proposed changes. We will publish an update on this work in Spring 2026.

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