Benchmarking operators' performance in rail passenger assistance: 2025 report

Executive summary

Passenger assistance enables older and disabled passengers to travel with confidence by providing help at stations and on trains – such as boarding, alighting and navigating complex station environments. It is a core requirement under operators' Accessible Travel Policies (ATP) and forms part of their licence obligations. Demand for assistance continues to grow: between April 2024 and March 2025, over 1.6 million pre-booked assists were requested, an 18% increase on the previous year. (N.B. An assist is all the help provided at one station. Two assists are recorded per journey leg, one when boarding and one when alighting.)

This report presents the Office of Rail and Road's (ORR) first annual benchmarking of train and station operators' delivery of passenger assistance. It forms part of the Government's Accessible railways roadmap. Our aim is to provide transparency on performance, identify areas for improvement and celebrate success where operators are delivering well. The benchmarking framework focuses on two areas:

- Delivery performance – how reliably assistance is provided, alongside passenger satisfaction and staff knowledge.
- Capability to Improve – a qualitative assessment of organisational capacity to strengthen delivery, targeted at operators with sustained poor performance.

Delivery performance

Survey data shows consistently high satisfaction and staff knowledge across all operators when assistance is delivered – so these are not major differentiators. However, reliability remains a

concern: 11% of passengers reported receiving none of the assistance they booked. Even the strongest performers failed some passengers.

Operators achieving the highest reliability scores were **Southeastern, London North Eastern Railway, and Network Rail**, closely followed by **Avanti West Coast**. These operators also performed strongly on satisfaction and staff knowledge. At the other end of the scale, **Northern Trains, South Western Railway (SWR) and West Midlands Trains (WMT)** recorded the lowest reliability. This variation highlights that while good practice exists, significant improvement is needed to ensure disabled passengers can travel with confidence.

Capability to improve

Given sustained poor reliability and limited progress following earlier engagement, ORR undertook assessments of **SWR** and **WMT**.

- **SWR** has shown commitment to improvement, commissioning an external review and taking steps towards data-driven decision-making. However, weaknesses remain in governance, risk management and structured oversight.
- **WMT** demonstrated a commitment to working with staff and disabled people to improve the experience of assisted travel, but provided limited and inconsistent evidence of its capability to improve, with gaps in data analysis, unclear feedback loops and training weaknesses.

Taking our findings into account, the operators have now committed to:

- **WMT** will commission an independent review and produce an Action Plan by the **end of March 2026**.
- Having already conducted its own independent review, **SWR** will submit an Action Plan by the **end of January 2026**.

ORR will monitor delivery and set out progress in our 2026 benchmarking report.

Northern Trains

We have been engaging with Northern since 2024 on our concerns with the poor reliability of its assistance provision. We accepted an improvement plan in December 2024 and all actions have been delivered. We are now monitoring Northern's progress towards delivering sustained improvements in the reliability of passenger assistance.

In 2025, however, we identified significant gaps in Northern's delivery of disability awareness training to passenger facing staff. Northern's improvement plan had included delivery of some targeted staff training but had not identified or addressed this wider training need. Northern established a recovery plan and, in November, reported that rollout of training to all relevant staff had been completed. We have now opened a formal investigation to establish the timeframe, scale and circumstances of this issue, and to seek assurances the recent training has been effective, and this issue will not arise again. This investigation could result in formal action.

Future framework and good practice

ORR will evolve the benchmarking framework for 2026 to include new metrics, such as passenger confidence post-assistance and staff training coverage. Work is underway with Rail Delivery Group to capture turn up and go (TUAG) reliability and integrate feedback from the Passenger Assistance app. The report also highlights examples of good practice from East Midlands Railway, Govia Thameslink Railway, Greater Anglia and Southeastern, covering areas such as data dashboards, stakeholder engagement and lived-experience training. These examples provide practical examples for operators seeking to improve reliability and passenger satisfaction.

Next steps

ORR will continue to monitor operators' performance, drive improvements through action plans, and consider how we best share lessons from higher-performing operators. Our goal is to ensure that disabled passengers can travel with confidence, supported by a reliable and responsive passenger assistance service.

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1. Introduction

Background

1.1 Every train and station operator must, as part of an Accessible Travel Policy (ATP) approved by ORR, commit to providing assistance to older and disabled rail passengers that request it. Passengers may book assistance in advance or request it at the station (known as turn up and go, or TUAG). This is an obligation of operators' licences to operate passenger services and manage stations.

1.2 The demand for passenger assistance is increasing: between April 2024 and March 2025 there were 1,620,880 pre-booked passenger assists requested, an increase of 18% on the previous year and more than in any previous year. An assist is all the help provided at one station. A journey leg consists of two assists, one at the boarding station and one at the alighting station.

1.3 Since 2017 ORR has conducted ongoing passenger research to assess the extent to which the needs and expectations of passengers who have booked assistance in advance are being met. Our most recent report of survey findings, which covers the period from April 2024 to March 2025, suggests that satisfaction with assistance where it is delivered is high, but that service reliability is not good enough. In that period, 11% of respondents to the survey reported that they received none of the assistance they had booked.

1.4 We know that failures of this sort can leave passengers feeling angry, frustrated and helpless. To help us drive improvements, we sought feedback on a new framework to benchmark the performance of operators' delivery of assistance. Our Rail Passenger Assistance: Benchmarking Train Operators' Performance consultation ran from 11 December 2024 to 14 February 2025. Respondents were in favour of ORR publishing a report that benchmarks operators' performance in delivering assistance, highlighting how this would make it easier to identify issues and areas for improvement as well as celebrate success. Respondents also supported a broad focus on two key areas of assessment: delivery of assistance and capability to improve. Using this feedback, we developed the benchmarking methodology set out below, focusing our assessment of capability to improve on the poorer performing operators, while benchmarking delivery across all operators.

Benchmarking methodology

1.5 Our benchmarking assessment comprises two key components: a quantitative evaluation of **Delivery** performance (**Chapter 2**) and a Qualitative review of two poorer performing operators' **Capability to Improve** (**Chapters 3** and **4**).

Delivery assessment

1.6 The Delivery assessment is based on data collected through our Experiences of Passenger Assist survey between April 2022 and March 2025, focusing on three core metrics: reliability, satisfaction, and staff knowledge and proficiency.

- **Reliability** was measured by the percentage of passengers who reported receiving none of

the assistance they had booked;

- **Satisfaction** captured the proportion of passengers who were 'satisfied' or 'very satisfied' with the assistance they received, when met; and
- **Staff knowledge and proficiency** reflected passengers' views on the competence of staff delivering that assistance, when met.

1.7 Across the three-year period, 26,306 responses have been analysed. To ensure a robust and representative analysis, we applied a three-year scoring system. We gave greater emphasis to the most recent year (weighted 1:2:3). An overall delivery score was then calculated using the following weightings: 50% for reliability, 25% for satisfaction, and 25% for staff knowledge and proficiency. As the scores for the latter two metrics placed all operators in a narrow performance band, for 2025 we decided to rank operators based on reliability as the key metric for Delivery.

1.8 Performance has been attributed to the operator with overall responsibility for assistance at a station. In most cases this is the station operator, however at some Network Rail stations, one or more train operators are responsible for delivering assistance instead and our analysis reflects this.

1.9 In 2025, the following operators met the threshold of at least 50 survey responses per year and were included in the benchmarking assessment (total sample sizes over three years are provided in brackets):

- Avanti West Coast (1,936 survey responses over three years)
- Chiltern Railways (288)
- East Midlands Railway (738)
- Govia Thameslink Railway (836)
- Great Western Railway (3,830)
- Greater Anglia (839)
- London North Eastern Railway (5,338)
- Network Rail (4,442)
- Northern Trains (1,501)
- ScotRail (1,347)
- South Western Railway (1,163)
- Southeastern (857)
- TransPennine Express (845)
- Transport for Wales (1,185)

- West Midlands Trains (831)

1.10 Operators excluded from the assessment, due to low response rates or because they do not manage stations, included Arriva Rail London (London Overground), c2c, CrossCountry, Grand Central, GTS Rail (Elizabeth line), Hull Trains, London Underground and Lumo. We are actively working to expand future coverage by increasing survey sample sizes and exploring alternative data sources, such as feedback from the Passenger Assistance mobile app. This is explored further later in this chapter.

Capability to Improve assessment

1.11 We used the rankings from the Delivery assessment to target Capability to Improve assessments at two operators. These were the operators whose delivery performance raised the greatest concern, and where previous engagement, following on from letters we wrote to operators with the lowest reliability scores in our 2023 to 2024 passenger assistance survey had not led to meaningful change: **South Western Railway (SWR) and West Midlands Trains (WMT)**.

1.12 An overview of the findings of our Capability to Improve assessments and proposed next steps for the two operators are provided in Chapters 3 (SWR) and 4 (WMT).

1.13 The Capability to Improve assessment examined four key areas:

- **Monitoring and reporting** – how effectively the operator tracks and evaluates assistance delivery.
- **Risks and mitigations** – whether the operator has identified key risks and implemented appropriate solutions.
- **Engagement** – the extent and quality of engagement with passengers, staff, and industry stakeholders.
- **Training** – evidence of meeting the training outcomes set out in our Accessible Travel Policy (ATP) Guidance.

1.14 Operators were assessed against the descriptors in Annex A. The process began with an information request, followed by iterative engagement where necessary to clarify and expand upon the evidence provided. In order to supplement this written evidence, we also undertook the following activities:

- Visited a sample of seven stations on each operator's network to speak to staff and see

assistance delivery in practice;

- Held a series of focus groups and interviews with staff that deliver assistance (the summaries of which are published separately on ORR's website); we aimed to recruit larger samples but were limited by recruitment and other challenges which limited volunteers to seven staff members for WMT and ten for SWR;
- Observed each operator's accessibility panels of disabled passengers and stakeholders, and a WMT disability awareness induction training session; and
- Held meetings with key management staff and senior leaders at the two operators.

1.15 The findings and recommendations in this report are based on the evidence supplied to us during the course of our engagement. In some cases, despite a number of attempts to secure additional information and provide operators with opportunities for further disclosure, this evidence was limited, lacked coherence and structure, or presented only partial snapshots of documents with little context. This was particularly the case with WMT. Where the evidence is inconclusive as a result or did not provide us with sufficient confidence of capability, this has informed our overall assessment.

Future framework evolution

1.16 We are actively working to evolve the benchmarking framework to include further sources of data, both to help broaden its scope to other operators and to develop other measures of operator performance.

1.17 To begin with, we have now incorporated an additional question into the passenger assistance survey to assess passengers' confidence to travel with an operator following their experience of the specific assistance in question. From 2026, we intend to report on the percentage of passengers that report they are 'more confident' or 'much more confident' about doing a similar journey in future.

1.18 From 2026, we also intend to report on the percentage of eligible staff who have received either induction training or refresher training within the past two years.

1.19 Operators have been reporting to us against new passenger assistance outcome categories since April 2025, based on data captured by staff at stations. We will consider whether and how to build this data into the benchmarking assessment once we are content with data quality.

1.20 We are also working with Rail Delivery Group (RDG) to explore how we might capture the

reliability of turn up and go (TUAG) passenger assistance.

1.21 For satisfaction, we are exploring with RDG how we might use feedback provided by users of the Passenger Assistance mobile app. We will consider whether and how to build this data into the benchmarking assessment.

Good practice

1.22 We asked all train operators to provide examples of good practice of the benchmarking descriptors set out in Annex A. Four operators responded: East Midlands Railway, Govia Thameslink Railway, Greater Anglia and Southeastern. In Chapter 6 of this report, we highlight a selection of initiatives from these operators for the benefit of other operators wishing to improve the reliable delivery of good quality assistance.

1.23 In 2026 we will consider the opportunities for all operators to learn lessons from any further good practice shared by higher-ranking operators.

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- → Next 2. Benchmarking operators' Delivery performance

2. Benchmarking operators' Delivery performance

Reliability and passenger satisfaction with assistance and staff

2.1 Table 2.1 ranks operators' performance in delivering assistance over the last three years (weighted in favour of the most recent years), using the methodology described in Chapter 1. Operators are ranked based on the reliability of assistance provided.

Table 2.1 Weighted assessment of assistance delivery, 2022 to 2025

Operator	Reliability (proportion receiving none of the assistance booked)	Satisfaction with assistance received at station	Satisfaction with staff knowledge and proficiency at station	Overall delivery score
Southeastern	8%	95%	94%	93
London North Eastern Railway	8%	96%	95%	94
Network Rail	8%	94%	93%	93
Avanti West Coast	9%	94%	94%	92
Govia Thameslink Railway	10%	93%	95%	92
Great Western Railway	10%	95%	95%	92

Operator	Reliability (proportion receiving none of the assistance booked)	Satisfaction with assistance received at station	Satisfaction with staff knowledge and proficiency at station	Overall delivery score
Chiltern Railways	10%	90%	92%	91
ScotRail	11%	93%	93%	91
Greater Anglia	12%	94%	95%	91
East Midlands Railway	12%	92%	92%	90
TransPennine Express	12%	94%	94%	91
Transport for Wales	14%	93%	93%	89
West Midlands	14%	92%	92%	89

Operator	Reliability (proportion receiving none of the assistance booked)	Satisfaction with assistance received at station	Satisfaction with staff knowledge and proficiency at station	Overall delivery score
Trains				
South Western Railway	15%	92%	92%	89
Northern Trains	16%	93%	93%	88

Figures are rounded to the nearest whole number.

Figure 2.1 Weighted assessment of assistance delivery, 2022 to 2025

Operator	Reliability (proportion receiving none of the assistance booked)	Satisfaction with assistance received at station	Satisfaction with staff knowledge and proficiency at station	Overall delivery score
Southeastern	**8%**	95%	94%	93
London North Eastern Railway	**8%**	96%	95%	94
Network Rail	**8%**	94%	93%	93
Avanti West Coast	**9%**	94%	94%	92
Govia Thameslink Railway	**10%**	93%	95%	92
Great Western Railway	**10%**	95%	95%	92
Chiltern Railways	**10%**	90%	92%	91
ScotRail	**11%**	93%	93%	91
Greater Anglia	**12%**	94%	95%	91
East Midlands Railway	**12%**	92%	92%	90
TransPennine Express	**12%**	94%	94%	91
Transport for Wales	**14%**	93%	93%	89
West Midlands Trains	**14%**	92%	92%	89
South Western Railway	**15%**	92%	92%	89
Northern Trains	**16%**	93%	93%	88

Figures are rounded to the nearest whole number.

2.2 This assessment shows a picture of high satisfaction with assistance received at the station, and with staff knowledge and proficiency, across all operators. Where assistance was delivered, it was almost always delivered well.

2.3 However, there is a more mixed picture in terms of the reliability of assistance delivery across operators.

2.4 We have ranked operators based on reliability as the key metric for Delivery because the scores for the two satisfaction metrics placed all operators in a narrow performance band.

Strongest performers

2.5 The three strongest performers in terms of reliability are **Southeastern**, **London North Eastern Railway (LNER)** and **Network Rail**, closely followed by **Avanti West Coast**.

2.6 There is less variation between operators in terms of the two satisfaction measures. **Great**

Western Railway, Govia Thameslink Railway, Greater Anglia and TransPennine Express join Southeastern, LNER, Network Rail and Avanti West Coast in achieving the highest scores on these two measures.

2.7 In 2026 we will consider the opportunities for all operators to learn lessons from any good practice shared by these higher-ranking operators.

Weakest performers

2.8 The operators with the lowest reliability are Northern Trains, South Western Railway (SWR), West Midlands Trains (WMT), and Transport for Wales (TfW).

2.9 For SWR and WMT this now represents a pattern of sustained poor performance. As a result, we decided to undertake full Capability to Improve assessments, examining their organisational capacity to manage and enhance the delivery of passenger assistance. The findings from these assessments are included in this benchmarking report in Chapters 3 and 4 respectively, along with our recommended next steps.

2.10 In contrast, East Midlands Railway (EMR) and TfW were also informally challenged on their performance last year, when we wrote to them as operators with some of the lowest reliability scores in our 2023 to 2024 survey, and responded constructively. Both operators voluntarily developed and shared improvement plans with us, and our monitoring suggests that these are starting to drive better reliability. Given these proactive steps, we have not assessed their Capability to Improve formally, as doing so would likely have added limited value and placed an unnecessary burden on the operators. We will continue to monitor their performance to ensure that improvements are sustained

2.11 We requested a formal improvement plan from Northern following the 2023 to 2024 survey, in which Northern recorded the lowest reliability of all operators. Northern has now delivered all actions in its plan and we are now monitoring for sustained improvements in the reliability of assistance offered to passengers. We did not conduct a capability to improve assessment at this stage, as we believed it would not provide additional insight. Instead, this report includes in Chapter 5 an update on Northern's progress against its Improvement Plan.

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3. SWR Capability to Improve: assessment and next steps

Overall assessment

Over the course of our assessment, South Western Railway (SWR) demonstrated a clear commitment to improving its passenger assistance service, with recent actions suggesting a shift towards more data-driven decision-making and long-needed operational enhancements.

Earlier this year, SWR commissioned an external review of its passenger assistance delivery, which amongst other things found weaknesses in governance and risk management. We agree that these weaknesses, combined with gaps in data analysis, may have contributed to its poor performance. SWR needs to develop and deliver a plan to strengthen in these areas; we also recommend SWR considers how to enhance staff capability, and make better use of its engagement with disabled passengers and stakeholders to develop and feedback on improvements.

Continued progress will depend on embedding structured oversight, strengthening the use of feedback and data to develop improvements, and ensuring training addresses the diverse needs of passengers that require assistance.

Overview of operator

3.1 SWR is one of the largest train operators in the country, serving South West London, southern England, and the Isle of Wight. It provides for dense commuter flows alongside regional and leisure travel, with Vauxhall, Wimbledon, Woking and Southampton Central among the 187 stations it manages. Waterloo and Clapham Junction, both managed by Network Rail, are major stations served by SWR and where SWR is responsible for delivering assistance for all its services.

3.2 During April 2024 to March 2025, SWR handled 165.6 million passenger journeys and recorded delivery of 177,451 assists (79,520 pre-booked and 97,931 turn up and go (TUAG)). In terms of pre-booked assists, this represented a 21% increase on the previous year. It employed 5,497 full-time equivalent staff as of 31 March 2025.

3.3 On 25 May 2025, SWR transferred into public ownership, as part of DfT Operator Limited. It

was therefore under different management during the time period when the operator's Delivery performance was assessed.

3.4 Key statistics for all operators can be viewed on the ORR data portal.

Evidence of capability

Monitoring and reporting

3.5 SWR has access to a good variety of data sources to assess passenger assistance performance, for both booked and TUAG assists, including data from the central industry passenger assistance system, mystery shopping, complaints and feedback from users of the service.

3.6 Earlier this year, SWR commissioned an external review of its assistance delivery which, amongst other recommendations, highlighted a lack of passenger assistance performance review meetings to discuss this data. While we welcome that SWR took the initiative to commission a review, at the point we commenced our assessment no actions had been taken in response to the review's findings and this weakness had not been addressed; more detailed monitoring and reporting remained limited to a broader station improvements workstream. This workstream appears to be an effective vehicle for delivering station-level improvements, but it is only in this workstream that key metrics which provide internal accountability for journeys where assistance is not provided appear to be discussed although these are not disaggregated to the station level.

3.7 The periodic and quarterly reports we have seen for senior managers, leaders and stakeholders are less insightful, focusing on a small number of metrics that either have limited value (such as assistance complaints as proportion of total complaints) or exclude key context and information. For example, its reliability metrics exclude certain 'incomplete' assists, such as those where the customer could not be located, which may limit the accuracy of performance reporting. We saw no evidence of reporting setting out where assistance performance needs significant attention, such as at stations with significant additional demand.

3.8 Overall, we are concerned SWR's historic approach to monitoring and reporting lacks appropriate analysis, insight and transparency, and as a result decision-makers may be missing meaningful insights into true passenger assistance performance and so opportunities to improve.

3.9 On a more positive note, as our assessment has progressed SWR has shown a welcome

appetite for and commitment to making better use of passenger assistance data to develop more meaningful insights and improvements. We welcome its plans do more in this area, building upon the findings of its external review.

Risks and mitigations

3.10 We received no evidence that SWR maintains an active risk or issue register for passenger assistance. SWR's own external review also highlighted this as a critical gap and we saw no evidence that steps had been taken to address the issue. We consider this a key failure of governance.

3.11 This failure is compounded by the historic underutilisation of its own passenger assistance data, as referenced in our assessment of SWR's monitoring and reporting. As a result, while specific issues affecting disabled passengers identified via complaints or mystery shopping may be mitigated, and peak demand planned for by station managers, long-standing risks that are well known to station staff and management remain unresolved. Examples include handovers at Waterloo between SWR and Transport for London, and high demand from cruise ship passengers at Southampton Central. It is perhaps indicative that we were told that SWR has in the past been unable to make a successful business case to address the risks at Southampton Central, though we understand proposals are now being considered to address this.

3.12 More positively, frontline staff appear confident in their roles and responsibilities. In addition, although not driven by a structured assessment of risks to assistance, SWR has recently introduced initiatives that have the potential to improve assistance delivery, such as enhancing lift reliability, greater use of the passenger assistance staff mobile application, and assisted boarding points.

Engagement

3.13 SWR's accessibility panel meets quarterly, is independently chaired, and benefits from active member participation (including between meetings). However, members lack clarity on how their input influences decisions, and performance data is not shared with them.

3.14 Engagement with the operators SWR interacts with at the operational level appears generally positive but largely reactive, focusing on resolving complaints rather than proactively managing risks or improving services. Internally, SWR engages well with its guards and station managers; it also appears to take an active and collaborative role in cross-industry initiatives.

3.15 In summary, whilst we saw positive signs of engagement across a range of internal and external stakeholders, we saw little evidence of the sort of structured feedback loop mechanisms that would deliver continuous improvements and allow staff and stakeholders to see the results of their input.

Training

3.16 The written evidence we reviewed suggests that SWR has good oversight of the number of frontline staff receiving disability awareness training, both at induction and then a refresher within two years. While this evidence suggested most staff are receiving this refresher training online, awareness of this training amongst staff in focus groups was patchy with some suggesting they had not completed it for many years.

3.17 Whilst our assessment was underway, autism awareness training was being rolled out to all frontline staff. We welcome this positive initiative but are concerned that general awareness of passengers with specific needs was mixed, both in our focus groups and in our station visits, with some staff even questioning whether certain passengers required assistance. SWR has acknowledged this is an area that needs focus.

3.18 Unfortunately, SWR provided only limited evidence of updated training materials, but have assured us that induction training includes lived experience input. Feedback is collected from participants, but we found only limited evidence of how training outcomes are assessed or how feedback is used to improve materials. It is also unclear the extent to which training outcomes are monitored on an ongoing basis.

3.19 Overall, we consider that more needs to be done to ensure SWR's disability awareness training is meeting the needs of staff and delivering the required outcomes. Non-visible disabilities are an area on which SWR should maintain its focus.

Next steps

3.20 Based on our assessment, we set out below our expectations of actions SWR should take to strengthen its capability to improve assistance delivery, building on the recommendations of its own external review.

Monitoring and reporting / risks and mitigations

1. Improve data categorisation, insight and ownership

SWR should enhance its use of existing data to generate more targeted insights at station and route level, with a particular focus the reliability of assistance. In particular, SWR should take action to reduce instances where customers are not found by staff and are therefore at risk of not receiving the assistance they need to travel. Its success metric should accurately reflect performance in this area. To support this process, we welcome the expansion of SWR's mystery shopping programme; results should continue to be systematically analysed and used to inform service improvements.

2. Establish a formal risk register

SWR should develop and maintain a formal risk register that captures key risks associated with the delivery of passenger assistance services, along with appropriate mitigations. Each risk should be assigned a responsible owner and reviewed on a regular schedule. The register should be reviewed and updated frequently to reflect operational changes and emerging issues.

3. Enhance governance and reporting

Governance arrangements within SWR should be strengthened to ensure that passenger assistance performance is regularly reviewed and challenged at senior levels. Executive leadership should assure itself it has the right data analysis to carry out this assessment. This should be informed by the establishment of regular review meetings at working level, focused on passenger assistance. Insights from individual stations should be integrated into strategic decision-making processes to ensure that local challenges and successes inform broader delivery and are shared with industry.

Engagement / training

4. Strengthen feedback loops

SWR should make more effective use of its existing stakeholder engagement structures to gather and act on feedback related to passenger assistance. Feedback loops involving SWR's accessibility panel, staff and external stakeholders must be reinforced, with clear evidence of how input is used to shape service delivery and training. The impact of feedback should be visible and measurable, helping to build trust and demonstrate responsiveness.

5. Strengthen training assurance

SWR must ensure robust tracking of both disability awareness training completion and effectiveness across all relevant staff groups. Training programmes should be reviewed to ensure inclusion of content that raises awareness of non-visible disabilities, ideally incorporating lived experience to deepen understanding. Completion of training should be linked to performance reviews to reinforce its importance, demonstrate understanding and ensure sustained behavioural change.

In order to deliver these recommendations, alongside those of its own external review, we are asking SWR to provide us an Action Plan with deliverables and timescales, **by the end of January 2026**. We will then monitor both the delivery of this plan and SWR's passenger assistance performance, with regular review points. We will report on SWR's progress in our 2026 Benchmarking Report.

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- → Next 4. WMT Capability to Improve: assessment and next steps

4. WMT Capability to Improve: assessment and next steps

Overall assessment

West Midlands Trains (WMT) has taken steps to improve its passenger assistance delivery, including increasing use of varied data sources, a new stakeholder forum, and encouraging staff use of the industry's passenger assistance staff mobile app.

However, **the evidence provided during our assessment was limited and not always easy to interpret, making it difficult to fully understand the effectiveness of these efforts.** Based on that evidence, our assessment is that WMT's potential may be undermined by gaps in data analysis, limited issue management, unclear feedback loops, and a lack of focus on targeted improvements to assistance delivery. We recommend WMT commissions its own review of passenger assistance delivery to explore these issues more fully.

Overview of operator

4.1 West Midlands Trains (WMT) operates under two brands: West Midlands Railway and London Northwestern Railway. Its routes span from Liverpool to London, passing through major hubs such as Birmingham and stations including Wolverhampton and Milton Keynes Central. WMT operates both regional commuter services across the West Midlands and longer-distance intercity connections to London Euston and the North West.

4.2 It manages 149 stations, including busy locations such as Watford Junction, Milton Keynes Central, Wolverhampton, University (Birmingham) and Birmingham Snow Hill. During April 2024 to March 2025, WMT recorded 67.7 million passenger journeys and recorded delivery of 92,093 assists (56,613 pre-booked and 35,480 turn up and go). In terms of pre-booked assists, this represented a 20% increase on the previous year. As of 31 March 2025, it employed 3,123 full-time equivalent staff.

4.3 Under the Government's rail reform programme, the company will transfer to public ownership on 1 February 2026, becoming part of the DfT Operator Limited.

4.4 Key statistics for all operators can be viewed on the ORR data portal.

Evidence of capability

Monitoring and reporting

4.5 WMT has access to a broad range of data sources to monitor passenger assistance performance: its own Assisted Travel Survey, assist volumes, mystery shopping, passenger feedback via the Passenger Assistance app and complaints data.

4.6 Staff record the outcomes of assists through the industry-wide staff mobile app. In interviews, staff reported confusion and difficulty using the app. WMT did describe steps it is taking to increase usage to support the handover of passengers from station to station but did not evidence the impact of these actions. The effectiveness of mystery shopping as a performance insight tool also remains unclear.

4.7 A Customer Experience Board taskforce is presented with data on complaints received, completed assists (total), positive feedback via the Passenger Assistance app, complaints per

'assistance delivered', as well as 'successful assists'. This final metric excludes certain 'incomplete' assists, such as those where the customer could not be located by staff, which may limit the accuracy and impact of performance reporting. While WMT claims to assure the validity the data it collects on passengers' experience of assistance, no supporting evidence was provided during the assessment.

4.8 WMT has begun to explore the potential of passenger assistance system data to generate more detailed insights alongside recent analysis of is Assisted Travel Survey, which has the potential to be a rich source of insight. It is important that WMT makes use of this data, as in its responses to our requests for information we found little evidence of a clear strategy for using survey results or passenger assistance data to understand or improve reliability, and only limited evidence of action taken at key stations with known performance challenges such as Wolverhampton. We are concerned this may limit WMT's ability to develop targeted interventions and drive meaningful improvements in assistance delivery.

Risks and Mitigations

4.9 WMT maintains a risk register for assistance delivery, which covers operational and infrastructure risks such as lifts failing, systems failure of the Passenger Assistance staff app and platform-train interface issues. We saw no evidence that more targeted risks were also being systematically considered, such as risks to specific customer groups or at individual stations. We might for example have expected to see risks recorded in relation to stations with significant demand or other challenges, for instance where ticket office staff provide assistance alongside their other duties at busy times, or relating to the usage of the app by guards (an issue of which WMT has little visibility).

4.10 WMT has introduced initiatives aimed at minimising risks to the experience for disabled passengers. For example, station managers reported that they actively plan for periods of peak assistance demand, and a dedicated taskforce is overseeing the implementation of mitigations intended to increase staff app usage, for which an issues log has been created. Frontline staff also appear confident in their roles and responsibilities.

4.11 During our assessment, we received minimal evidence indicating how frequently the risk register is reviewed or how promptly mitigations are actioned. Alongside the gaps we have identified, we are therefore concerned that WMT may not be fully capturing or addressing all the operational risks that could impact the consistency and reliability of assistance delivery.

Engagement

4.12 WMT has established two forums for engaging disabled stakeholders. While both groups provide valuable input, their distinct roles and how they coordinate are unclear. The newer Stakeholder Equality Group appears to offer effective feedback on specific initiatives, and WMT described to us a number of examples where this input had resulted in improvements and how this is tracked. These assertions were not well supported by the documentary evidence provided, and the older forum (its Stakeholder Accessibility Group) expressed concerns about being excluded from early-stage discussions, limiting its ability to influence outcomes. We are therefore unsure whether this input is always sought early enough to meaningfully shape project development.

4.13 WMT has also taken steps to engage frontline staff through management station visits, which are used to promote the staff app and gather feedback on its use. This reflects a degree of proactive engagement. More broadly, there is limited evidence that staff and stakeholder feedback is systematically captured or used to inform service improvements. While WMT asserts that feedback influences its initiatives, there is little visibility of performance reporting, structured feedback channels, or how input translates into tangible changes.

4.14 We received minimal evidence of WMT's collaboration with other operators and wider industry groups; what was provided lacked detail. Assertions of contributions to cross-industry initiatives were not well substantiated during the assessment.

4.15 Accessibility stakeholder engagement and management is clearly an area of focus for WMT. It is therefore disappointing that, whilst the stakeholder group meeting we observed was a positive example of engagement, the supporting documentation provided for this part of the assessment was too limited for us to reach broad conclusions on the depth and effectiveness of WMT's engagement, both internal and external, as well as its ability to contribute to broader improvements in accessibility across the rail network. We therefore find that WMT should consider further whether it is making most effective use of its various stakeholder engagements to provide meaningful input into its proposals and plan.

Training

4.16 WMT set out to us how it tracks the completion of induction training for accessibility, but otherwise we received limited evidence of ongoing internal monitoring or mechanisms for incorporating feedback into training materials. Furthermore, awareness of refresher training was

not widespread amongst the staff we were able to speak to, adding weight to our concerns that current assurance processes may not be sufficient to ensure continued competence and understanding across the workforce.

4.17 We were provided with limited evidence of WMT's training materials but were able to observe the disability awareness training provided at induction for new staff. Whilst training facilitators are clearly passionate about delivering a good service for disabled passengers, the training material relies heavily on generic, publicly available multimedia content, little of which was tailored to the challenges disabled people face when travelling by rail. Quizzes of facts and figures aside, participants were largely passive, and there was only limited focus on effective communication and the lived experiences of disabled passengers.

4.18 We are also concerned that disabled people's voices are not consistently present in WMT's induction training sessions. While input from one of the two forums is referenced in the training slides, and we were provided with evidence of a video made in collaboration with this forum, this input was not reflected in the training content observed during the assessment.

4.19 Overall, we are not convinced this training is sufficient to equip staff with the skills and knowledge needed to provide high-quality assistance. We find that WMT would benefit from refreshing its training approach to include more interactive elements and direct engagement with disabled people, ensuring that staff gain a deeper understanding of diverse passenger needs.

Next steps

4.20 Based on our assessment, we set out below our expectations of actions WMT should take to strengthen its capability to improve assistance delivery.

Monitoring and reporting / risks and mitigations

1. Strengthen issue management

WMT should expand and keep under ongoing review its existing risk register and issues log to ensure comprehensive coverage of operational challenges related to passenger assistance. Mitigation actions should be clearly tracked, with escalation procedures in place to address unresolved or recurring issues. This will support a more proactive and transparent approach to service improvement.

2. Improve data quality and insights

WMT should make more effective use of the data it collects to generate meaningful insights at station and route level, particularly in relation to disabled passengers' experiences. In particular, WMT should take action to reduce instances where customers are not found by staff and are therefore at risk of not receiving the assistance they need to travel. Its success metric should accurately reflect performance in this area.

WMT should assure itself of the effectiveness of mystery shopping as a performance insight tool.

3. Review of assistance delivery capability

WMT should conduct an internal review of its passenger assistance delivery capability, taking into account the recommendations set out in this report. This review should assess current practices, identify gaps, and lead to the development of further recommendations where appropriate. The aim is to ensure that WMT's assistance delivery is robust, responsive, and aligned with passenger needs.

Engagement

4. Strengthen engagement governance and feedback loops

The roles and governance arrangements of stakeholder groups should be clarified to ensure meaningful engagement. Existing stakeholder engagement structures should be used more effectively, and feedback loops involving both staff and stakeholders must be strengthened. WMT should assure itself that staff and stakeholder feedback informs and strengthens service delivery and training, with visible impact across the organisation.

5. Enhance training delivery

WMT should refresh its disability awareness training programmes to ensure it includes greater lived experience perspectives and focuses more on practical communication and staff interaction, which equips staff to respond effectively to a diverse range of passenger needs.

As set out in recommendation 3, because of the limited nature of some of the evidence provided to us during this assessment, we have asked WMT to commission its own review of passenger assistance delivery, before developing an action plan **by the end of March 2026** that considers both its recommendations and those set out in this report.

We will then monitor both the delivery of this plan and WMT's passenger assistance performance, with regular review points. We will report on WMT's progress in our 2026 Benchmarking Report.

- ← Previous 3. SWR Capability to Improve: assessment and next steps
- → Next 5. Engagement with Northern Trains

5. Engagement with Northern Trains

Background

5.1 Northern performed poorly for reliability in our 2023 to 2024 survey. Eighteen percent of respondents reported they received none of the assistance they booked at Northern stations.

5.2 In July 2024 we engaged Northern setting out our concerns. We asked for analysis of what caused recent failed assists and the steps being taken to improve performance. Northern's response did not reassure us that it understood its own performance, the causes of its failings, or that it had robust plans in place to secure improvements.

Improvement plan

5.3 In September 2024, we requested an improvement plan to demonstrate Northern was taking the necessary steps to comply with its ATP commitments.

5.4 Northern submitted its plan on 4 November 2024 and we accepted it on 5 December 2024, following a thorough review.

5.5 Northern gathered insight from a range of sources to inform its plan, covering both passenger and staff perspectives. Sources included customer complaints, mystery shopping exercises, post-travel surveys, insight from the Northern Accessibility User Group and data from the passenger assistance staff app. Northern set out 21 actions across five key themes to address the issues it identified were driving poor assistance outcomes.

5.6 The five themes were:

- Policy and processes: to ensure consistency across the network
- Human factors: to ensure colleagues had the capability to deliver the service

- Disruption: to empower colleagues to adapt and respond to challenges caused by disruption
- Technology: to support consistency in service delivery and enable insight into quality performance
- Information: to ensure easy access to the information needed by customers and colleagues

5.7 Some of the actions that had the potential to have the highest impact and were therefore considered high priority included:

- Producing an assistance policy specifically for Northern to underpin all other changes;
- Producing Passenger Assistance procedure guidance for key roles and bespoke for types of location (e.g. large station, small station and conductors);
- Reviewing the staffing model for assistance at the ten stations that provided the highest volumes of assists, starting with Leeds station;
- Establishing a new team dedicated to remotely supporting passengers who require assistance, including during their journey, using phone and WhatsApp;
- Piloting additional staff training on communication between boarding and alighting stations;
- Trialling a new process that enables passengers at unstaffed stations who have not pre-booked assistance to alert conductors to their presence;
- Working with staff and staff representatives to progress rollout of the passenger assistance staff app; and
- Ensuring that all reports of failed assistance are recorded, investigated and the root cause identified.

Progress to date

5.8 We reviewed progress via regular fortnightly meetings and carried out full reviews of progress against all actions in January 2025 and April 2025.

5.9 Northern's engagement throughout the process has been constructive. It has been receptive to ORR's input and promptly provided any additional information or context requested by ORR on an ad-hoc basis.

5.10 Northern made good progress early on and generally delivered against the timescales in the plan. Any actions that slipped past their original delivery deadline were generally delayed no

longer than a month and the reasons behind delays were always made clear and were reasonable. As such, at no point have we been concerned about the pace of Northern's implementation.

5.11 All actions are now complete.

Current status

5.12 As all actions have now been delivered, we are monitoring passenger outcomes to establish what improvements to passenger assistance reliability the plan has secured. While we are mindful that it can take time for actions to translate to direct benefits for passengers, Northern's staggered delivery dates means many actions have been in place for several months already.

5.13 Northern is reporting to us on its progress quarterly. Its reports draw on data from Northern's new failed assistance investigation process (currently Northern contact all passengers who have had a journey marked as incomplete in the passenger assist staff app and that it has contact details for), mystery shopping exercises (around 70 mystery shops are completed every four weeks), customer complaints data, and outputs from the passenger assistance staff app. Alongside, we are also continuing to monitor the responses to our own passenger survey.

Disability awareness training

5.14 We introduced a new approach to monitoring compliance with disability awareness training requirements in April 2025, with all operators reporting key metrics to us every quarter. We received Northern's first submission in August 2025, which reported that Northern had around 800 station and revenue protection staff that had not received disability awareness training. Disability awareness training for passenger-facing staff, with defined outcomes, has been a requirement of our ATP Guidance since 2021. Northern's improvement plan had included delivery of some targeted staff training but had not identified or addressed this wider training need.

5.15 We requested a full recovery plan, setting out how Northern would ensure that station staff were able to meet the training outcomes set out in our ATP Guidance. The key elements of our request included:

- A detailed description of how training would be delivered including, for example, which content would be delivered through face-to-face training sessions or e-learning, and who would deliver face-to-face training.
- A description of how disabled people had been involved in the development of course

content and material, and how staff will hear from disabled people about their lived experience of using the railway.
- Copies of all training material being used.
- A trajectory showing, week by week, the number of staff to receive training.
- Dates and locations of planned training activities.

5.16 Northern responded to the request constructively and submitted an ambitious plan to deliver all outstanding training over a four-week period and by 31 October 2025, using largely face to face sessions at stations by a team of Passenger Assist Champions and Team Leaders.

5.17 On 4 November 2025, Northern reported it had fulfilled the plan, and all training had been delivered.

Next steps

5.18 It is approaching 12 months since ORR accepted Northern's passenger assistance improvement plan. We continue to monitor performance for sustained improvement to the reliability of passenger assistance delivery.

5.19 Separately, in relation to the 800 station and revenue protection staff that had not received disability awareness training, we are opening a formal investigation into whether Northern contravened, or is contravening, Condition 5 of its Station Licence and GB Statement of National Regulatory Provisions (SNRP): Passenger.

5.20 The scope of the investigation will include the following:

- The timeframe over which staff who had not received required training were interacting with disabled passengers, and the scale and impact of the issue;
- The circumstances that led to staff not receiving training when required and how the issue remained unresolved and unreported during this timeframe; and
- How Northern can assure itself, its passengers and ORR that i) the recent training has been effective and is enabling staff to meet the required training outcomes and ii) a similar situation will not arise in future.

5.21 The outcomes of this formal investigation could ultimately result in a finding of breach of Northern's Station Licence and GB SNRP: Passenger, and if appropriate, formal action.

- ← Previous 4. WMT Capability to Improve: assessment and next steps
- → Next 6. Good practice

6. Good practice

Introduction

6.1 We gave all operators the opportunity to provide examples of good practice for the benchmarking descriptors set out in Annex A. Four operators responded: **East Midlands Railway (EMR), Govia Thameslink Railway (GTR), Greater Anglia (GA) and Southeastern**. We have highlighted below a selection of case studies from these operators for the benefit of other operators wishing to improve the reliable delivery of good quality assistance

6.2 In 2026 we will consider the opportunities for all operators to learn lessons from any further good practice shared by higher-ranking operators.

Case studies

Monitoring and reporting

6.3 **Greater Anglia** considers a wide range of data sources to capture information, feedback and insight on issues that impact reliability of assistance delivery, including complaints.

Greater Anglia – dashboard data

GA's dashboards are designed to provide comprehensive insight into accessible travel including assistance performance. This insight predominantly comes from passenger assistance data but also includes data from other sources such as complaints, Office of National Statistics, its e-learning platforms, its customer relationship management system, its customer survey data, ORR and the Rail Data Marketplace. GA has indicated its intention to expand the use of passenger assistance data for developing station-level insights, depending on upcoming changes to how assistance outcomes are recorded and the availability of more accurate data.

6.4 **GTR** provided an example of using data to generate performance reports, regularly reviewed by management.

Govia Thameslink Railway – insight reports

GTR has adapted its safety management system to investigate cases where passengers are not provided the assistance that they should have received. GTR's insight reports highlight how many failed assists are recorded at key stations; this data is then fed into key governance groups, failures are investigated and outcomes tracked.

6.5 **Southeastern** is developing a good, evidence-based understanding of the usage profile for its mobile assistance service.

Southeastern – mobile assistance recording

Southeastern Mobile Assist Staff (MAS) provide support at stations and onboard train services across the Southeastern network, which can sometimes include travelling with a passenger. The MAS complete a separate record for each assistance to capture the support they provide, helping Southeastern to monitor demand and understand the types of assistance required. This information can be filtered by station and time of day, allowing Southeastern to identify patterns and ensure teams are scheduled appropriately. Southeastern continuously reviews this data so that any increases in demand are recognised, and additional resources can be allocated where necessary.

Engagement

6.6 **EMR** provided an example of how engagement with staff elicited feedback that drove a specific service improvement, and how the benefit to passengers was tracked and measured.

EMR – Assistance Boarding Points at unstaffed stations

Feedback from members of EMR's Accessibility and Inclusion Panel highlighted that assistance users, and particularly those with non-visible disabilities, often faced challenges accessing both pre-booked and turn up and go (TUAG) assistance at unstaffed stations.

In response, EMR trialled bespoke assistance boarding point signage at Long Eaton and Belper stations. The design incorporated clear text, tactile symbols for visually impaired users, and included a QR code and WhatsApp number enabling customers to contact EMR's Control team directly. Locations were carefully selected near shelters and help points to ensure convenience and visibility.

The trial received positive feedback from passengers, who reported feeling more confident and reassured when travelling, and that assistance was delivered more promptly and reliably.

Passenger Assistance feedback provided by customers through the Passenger Assistance App has increased from 1.75/5 (star rating) for Belper and Long Eaton to 4/5, and EMR received no passenger assistance delivery complaints for these stations since the introduction of the meeting points.

Training

6.7 GTR staff are provided with the opportunity to hear from passengers with lived experience of disability and to discuss what they have heard.

Govia Thameslink Railway – in-person training

GTR has introduced face-to-face accessibility training sessions led by disabled trainers, focusing on real-life scenarios, language and terminology, to small cohorts of station staff. To date, around 240 staff have attended with further sessions planned. GTR has held similar sessions for its Control-based team who support customers remotely (via help points, freephone and text support).

- ← Previous 5. Engagement with Northern Trains
- → Next 7. Next steps

7. Next steps

Northern, SWR and WMT: Monitoring improvements

7.1 WMT must commission an independent review of its passenger assistance and, based on this review, develop an Action Plan by the end of March 2026 that incorporates both its own recommendations and those set out in this report. We will monitor delivery and report on WMT's progress in our 2026 Benchmarking Report

7.2 SWR has already undertaken a review of its assistance capability and so we are requiring SWR to submit a detailed Action Plan, including clear deliverables and timelines, by the end of January 2026. We will monitor the implementation of this plan and SWR's passenger assistance

performance through regular review points, with progress reported in our 2026 Benchmarking Report.

7.3 It is approaching 12 months since ORR accepted Northern's plan. We continue to monitor performance for sustained improvement to the reliability of passenger assistance delivery. Separately, in relation to 800 station and revenue protection staff that did not receive disability awareness training, we are opening a formal investigation into whether Northern contravened, or is contravening, Condition 5 of its Station Licence and GB Statement of National Regulatory Provisions (SNRP): Passenger.

Developing the 2026 benchmarking framework

7.4 Looking ahead, we are evolving the benchmarking framework to include additional data sources and performance measures.

7.5 From 2026, we will report on the percentage of passengers who feel more confident to travel with an operator following assistance, as well as the proportion of eligible staff who have received induction or refresher training within the past two years. Operators have been reporting against new outcome categories since April 2025, and we will consider integrating this data once quality is assured. In partnership with RDG, we are exploring ways to measure the reliability of turn up and go (TUAG) assistance and to incorporate feedback from the Passenger Assistance app into satisfaction metrics.

In addition, throughout 2025 to 2026, we will identify opportunities for all operators to learn from good practice demonstrated by higher-performing peers.

- ← Previous 6. Good practice
- → Next Annex A: Capability to Improve benchmarking descriptors

Annex A: Capability to Improve benchmarking descriptors

Monitoring and reporting

Please provide documentary evidence of how and to what extent you:

(i) Conduct your own data quality assurance, including assurance of data generated at the frontline, for accuracy and completeness, using comparator data sources where appropriate.

(ii) Take appropriate steps to address any gaps in data, or data quality issues.

A.1 Have a clear, consistent process for frontline staff to capture accurate, timely and comprehensive data on assistance outcomes – for both booked and turn up and go (TUAG) assistance.

(iii) Consider a range of other sources to capture information, feedback and insight on issues that impact reliability, including complaints.

(iv) Use this data to generate performance reports, regularly reviewed by management.

(v) As a result, have a good, evidence-based understanding of the usage profile for assistance, including types of assistance (booked and TUAG), and demand by station.

(vi) Complete accurate and timely Core Data submissions on assistance (booked and TUAG) and complaints for ORR, each rail period.

Risk and mitigation

Please provide documentary evidence of how and to what extent you:

(i) Have a solid, evidence-based understanding of the main risks to delivery of assistance, including service disruption.

(ii) Develop appropriate mitigations on the basis of this risk analysis.

(iii) Promptly implement mitigations (this may be on a trial basis).

(iv) Monitor the roll-out of mitigations, and keep their impact under review, with appropriate follow-up action where necessary.

(v) Document responsibility for assistance in job roles and up-to-date operational handbooks.

Engagement

Please provide documentary evidence of how and to what extent you:

(i) Have regular, structured engagement with a forum of disabled passengers (including those with non-visible disabilities), with performance reports shared and discussed with this forum.

(ii) Engage with interfacing operators to investigate the causes of assistance failures.

(iii) Engage with staff to elicit feedback that drives service improvements

(iv) Provide appropriate input to cross-industry groups and forums, to share mitigations and help develop cross-industry solutions.

(v) Incorporate learning from this engagement into SWR's own mitigations.

Training

Please provide documentary evidence of how and to what extent you:

(i) On an ongoing basis, assure yourself that all frontline staff are meeting the relevant training outcomes set out in Appendix D of the ATP Guidance, including where staff may need refresher training.

(ii) As part of their training programme, provide staff with the opportunity to hear from passengers with lived experience of disability and have the opportunity to discuss what they have heard.

(iii) Keep training content up to date, fit-for-purpose, obtain input from people with lived experience of disability, and incorporate feedback from staff that have undertaken the training.

- ← Previous 7. Next steps
- → Next 1. Introduction