Decision document: consultation on guidance on rail retailing

Overview

1. This document presents the outcome of the ORR consultation on the review of the Code of Practice on retail information for rail tickets and services, which took place between 30 September and 11 November 2025.

2. The consultation sought feedback on the Code of Practice, which was originally published in 2015, the primary purpose of which was to assist rail retailers in meeting their consumer law obligations regarding the provision of information to passengers.

3. The changes we proposed included:

   a. rebranding the 2015 Code to better reflect the intent of the document by renaming it 'Guidance on Rail Retailing'
   b. modifying the style of the Guidance to make it accessible and useable for both passengers and industry to help inform them of their respective rights and obligations
   c. updated content to account for new consumer law since the 2015 Code was published
   d. more general content updates to ensure better accuracy and relevance of some sections, alongside deletion of some obsolete information
   e. addition of new case studies to help inform and guide retailers towards best practice to support their compliance and continuous improvement.

4. We asked specifically for feedback on:

   a. whether the Guidance achieves its purpose for its intended audience

b. whether the updated principles achieve their purpose
c. whether the list of key product information is sufficiently comprehensive
d. whether the case studies are helpful, and any other topics which should be covered
e. any other feedback or comments relevant to the review of the Code of Practice.

Consultation responses

5. We received eleven responses to this consultation including:

a. two from train operators, or their representatives
b. four from rail retailers, or their representatives
c. four from organisations including passenger groups, advocacy groups, and alternative dispute resolution bodies, and
d. one from an individual member of the public.

6. We are grateful to all those who took the time to provide feedback.

7. Respondents broadly welcomed the review and the updated Guidance. There was strong support for the aim of ensuring passengers have access to clear, accurate, and timely information to make informed purchasing decisions.

8. Most respondents endorsed the new principles with some also noting specific areas which they felt may benefit from greater focus or additional detail – including accessibility, journey familiarity, and the challenges of information provision on different sales channels.
Some industry respondents highlighted the need for fair and non-discriminatory access to products and data for all retailers, as well as some technical and practical challenges of compliance.

9. A few respondents also requested clarification on ORR's approach to enforcement, and some respondents made suggestions for additional case study topics.

10. We have carefully considered all the feedback we have received and used it to inform the final Guidance document. In the following sections we provide more detail on the responses we received and where, or how, we have sought to address them.

Purpose and Audience

11. **Question 1** of our consultation asked the following: Do you think that the Guidance achieves its purpose for its intended audience (i.e. retailers, as well as interested consumers)?

12. All respondents welcomed the review, with broad agreement that updating the document to reflect changes in consumer law and retailing practices is timely and necessary. Respondents generally felt that rebadging the document as Guidance instead of a Code of Practice is more intuitive and reflective of its purpose.

13. The consensus was that the Guidance is clear and helpful for retailers, but there was also feedback that further simplification or the use of more consumer-friendly summaries would enhance its accessibility and readability for passengers. There were also suggestions about accessible formats.

14. The Guidance is primarily aimed at helping retailers understand their consumer law obligations but is also intended to help interested passengers understand what information they should expect to be provided with. The nature of the document necessitates a certain level of technical language. However, we have tried to be mindful of using clear terminology and explanations as much as possible. The Guidance is available in other formats via our website.

15. One respondent asked about the application of this Guidance to Travel Management Companies (who arrange corporate travel). Consumer law, and therefore the Guidance, applies to interactions between businesses and consumers, not between two businesses. For this reason, they are not the intended audience for the Guidance.

Principles

16. **Question 2** of our consultation asked the following: Do these new principles achieve their intended purpose? The revised Guidance introduces an overarching core principle that retailers must provide passengers with the information they need to make informed purchasing decisions. This is supported by four additional principles focusing on the clarity, accuracy, timeliness, and completeness of information provided to passengers.

17. The new principles were widely welcomed, with a number of respondents commenting that they clearly reflected the legal obligations. There was some feedback that accessibility should be

more explicitly embedded in each of the principles, and in response we have added a specific reference in the core principle to highlight this.

18. Another respondent also raised the challenges of providing information to passengers of different levels of confidence and familiarity with rail travel and/or their intended journey. In response to this we have also included mention of this in the core principle section.

19. One respondent disliked the use of the phrase 'average consumer' in the core principle section, arguing that the retailer should take into account the individual passenger's needs. This terminology is taken from consumer legislation, and we consider the Guidance to be sufficiently clear that the retailer should provide the information that is material to the individual passenger and so have not amended this wording.

20. The respondent also felt that the core principle should be strengthened to require journey planner algorithms to focus on other priorities in addition to speed of journey, such as cheapest fare, fewest changes of train, etc. Another respondent suggested that we set out minimum and aspirational requirements to clarify further the obligations relating to provision of material information. We recognise the ambition behind these suggestions but have decided not to make the Guidance more prescriptive, to allow room for innovation and for retailers to decide how they can best meet the needs of their customers. However, we have removed the word 'all' from the core principle section which stated "Retailers must ensure that passengers are provided with all the information they may need..." to more closely reflect the legislative requirements and acknowledge the difficulty in defining what 'all' might encompass.

21. Several respondents raised concerns about the technical and practical challenges of delivering the obligations covered by the Guidance, citing system and data constraints. We understand that there are some widely acknowledged challenges and these are being considered during wider rail reform. We have added some text to the Guidance to reflect these technical constraints but expect that retailers endeavour to find workarounds for the passenger benefit and work collaboratively across the industry to resolve these challenges.

22. There was also feedback about Principle D (also relevant to Case Study 4) which focuses on situations where information is omitted or restricted. Some respondents mentioned the limitations of Ticket Vending Machines at stations which usually sell a smaller range of tickets than other channels, aimed at sales for immediate travel. Other respondents emphasised that there are limitations on the range of fares that some retailers are permitted to sell, for example, where they cannot retail Pay As You Go fares. We have amended the Guidance to clarify that we

would expect a retailer to inform passengers where other tickets may be available on another of its own sales channels; we would not expect a retailer to point the customer to a competitor who may sell a different range of tickets.

Key Information

23. **Question 3** of our consultation asked the following: Is this list of information (in the Core Principle) sufficiently comprehensive? The Guidance has an updated list of information which may be material to passengers when choosing and buying tickets.

24. The list of key information was generally seen as comprehensive and relevant. Respondents welcomed the inclusion of accessibility information and compensation/refund rights, in particular.

25. One respondent asked for clarification about what constitutes an 'unavoidable' charge in relation to the 'total price' of a product. Examples of unavoidable charges include purchase taxes and administration fees. Retailers' obligations on price transparency were strengthened in the Digital Markets, Competition and Consumers Act 2024, and the Competition and Markets Authority has published Guidance on price transparency which we have linked to in our Guidance.

26. There were a number of suggestions for additional entries, including explanations of the validity and flexibility of specific ticket types. There were also proposals for including information about particularly busy travel times, and changes to the journey which occur post-purchase but prior to travel. We have kept this section focused to align with the consumer law obligations but also to recognise that work on fares reform/simplification is ongoing in the wider industry, in order to futureproof the Guidance for any future changes. Additionally, some of these areas suggested are already covered by industry standards, and there are existing online information sources for specific ticket validity information such as the retailers' and train operators' own websites/apps, and the National Rail website/app.

Case Studies

27. **Question 4** of our consultation asked the following: Are the case studies helpful in adding context from a rail retailing perspective to the legislative requirements? Are there any other current topics which you think should be included in the case studies? The Guidance now includes a section of case studies covering current relevant topics, such as fee transparency and journey

planning, to provide practical rail retailing context for the principles.

28. Respondents supported the inclusion of case studies as being valuable in illustrating practical application of the principles and making the Guidance more usable for both retailers and consumers. There were a few clarification questions about the examples, and we have slightly revised the wording of some of these as a result.

29. There were also ideas for additional case study topics, such as digital exclusion, AI search results, live accessibility information, split ticketing, pre-purchase information, and the impact of promotional fares.

30. Some respondents also suggested that the case studies should evolve over time in response to emerging issues and complaint trends – which is our intention. Given that there is a balance to be found between helpful detail and document length, we have not added any additional topics at this time. However, we will bear these topic suggestions in mind for future revision of the Guidance.

Additional Comments and Feedback

31. **Question 5** of our consultation asked the following: Do you have any additional comments or feedback you would like to provide which are relevant to our proposals?

32. A number of respondents raised broader issues which are not directly within scope of the Guidance document itself, although provide context about the rail ticket retailing market. These included calls for a wider role for retailers, for example, to be able to offer delay compensation claims processing, and Passenger Assist bookings. Some stakeholders highlighted the importance of aligning the Guidance with future rail reform, particularly the creation of Great British Railways (GBR), and ensuring fair competition between industry and independent retailers. There were also suggestions for improved data sharing, transparency in fares advertising, and protection for non-digital and face-to-face retail channels.

33. Some respondents mentioned the complexity of the current fares structure. Fares reform and simplification is an initiative Government is currently working on as part of wider rail reform. We acknowledge that the current structure can result in complex ticket terms and conditions which are challenging for retailers to explain to passengers.

34. For the purposes of this Guidance, we are focussing solely on the expectations of consumer

law in its application to the interaction between retailers and passengers. We appreciate that the underlying industry systems and data will have an impact on how retailers can use fares information and pass this information on to passengers. We are working separately with the retailers and other stakeholders in developing a Code of Practice on how Great British Railways will manage industry systems that facilitate the rail retail market. In the meantime, we encourage market participants to work together to resolve existing issues and ensure passengers have access to the information they need.

35. Some respondents asked for further information about our approach to the enforcement of consumer law. We have included some additional text on this point in the Guidance.

Our decision and next steps

36. We have edited the Guidance on Rail Retailing, taking into account the feedback from the consultation, and have published the final version on our website.

37. We will keep the Guidance under review and produce further editions as needed.

Annex - Respondents to the consultation

1. Assertis
2. Independent Rail Retailers Group
3. London TravelWatch
4. Member of public
5. Rail Delivery Group
6. Rail Europe
7. Rail Ombudsman
8. South Western Railway
9. Trainline
10. Transport Focus
11. Transport for All