Stephanie Tobyn
Director of Strategy, Policy and Reform

Tricia Williams
Managing Director
Northern Trains Limited

04/12/2025

Dear Tricia,

ORR investigation of Northern Trains Limited's[1] Compliance with Condition 5 (Accessible Travel Policy) of your Station Licence and GB Statement of National Regulatory Provisions: Passenger

I am writing to inform you 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. We are inviting you to share further information with us by close of business on Wednesday 17 December 2025.

Background

Condition 5 of the Station Licence and GB SNRP: Passenger requires the holder to establish and comply with an Accessible Travel Policy (ATP).

ORR approved Northern's ATP on 25 February 2021. Northern committed to deliver disability awareness training covering the mandatory training outcomes to existing passenger facing staff by 31 December 2021; induction training for new staff thereafter; and refresher training every two years. In 2022, through the ATP annual review process, Northern amended its ATP to remove the now historic reference to the 31 December 2021 commitment. Whilst the ATP has been updated since 2021 as part of an annual review process, commitments regarding the ongoing training of new and existing staff have remained.

On 12 August 2025, in response to ORR's new approach to monitoring training delivery, Northern reported that around 800 staff members, consisting of station-based staff and

[1] Referred to as 'Northern' throughout the remainder of this letter

revenue protection officers, had not completed disability awareness training. On 3 October 2025, I wrote to you setting out my concerns about the impact this lack of training may have had on the experiences of your passengers, and also that Northern had not made us aware of this compliance issue before.

Upon our request Northern provided a plan on 15 October 2025 setting out how it would ensure that affected staff were able to meet the training requirements set out in the ATP guidance. Northern's plan was ambitious and aimed to deliver training to all staff who required it over a 4-week period and be completed by 31 October 2025. On 4 November 2025, Northern reported that it had fulfilled the plan and all training had been delivered.

Given the concerns already raised with Northern, 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;

- 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.

Delivering the investigation

Jacqui Russell, Head of Consumer, will lead this investigation and Stewart Hill will support Jacqui as lead contact. We will carry out our investigation in accordance with our economic enforcement policy processes.

We will review the information we already hold on this matter and would welcome any additional information Northern would like us to consider, which could be shared with us in writing or through discussion of the issues, by close of business on Wednesday 17 December 2025.

We may also provide you with further specific clarification questions and/or requests for information or require additional engagement. Should we choose to do so, we will write to you under separate cover.

Given the engagement between us already undertaken on this issue, we aim to conclude our investigation as soon as possible. We will write to Northern again to advise of our findings and any relevant next steps in our process.

Our economic enforcement policy also encourages licence holders to offer reparations to be considered as part of our enforcement process, if a licence holder is willing to acknowledge its failings. Where reparations are to be offered, we prefer licence holders and relevant operators to offer reparations as early as possible.

To the extent you may be considering carrying out an internal review covering this matter, we would expect you to conduct the same with an eye to reducing unnecessary burden on yourselves, but without limiting in any way your response and provision of information to our investigation.

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.

Please be aware that we may use any information you provide, including information provided to date, to inform the discharge of our regulatory functions. We will publish our findings.

If you have any questions, please do not hesitate to contact Stewart Hill (stewart.hill@orr.gov.uk). A copy of this letter will be published on our website in due course.

Yours sincerely

Stephanie Tobyn