

**Stephanie Tobyn**  
Director of Strategy, Policy and Reform

Tricia Williams  
Managing Director  
Northern Trains Limited

3 March 2026

Dear Tricia

## **Contravention of Condition 5 (Accessible Travel Policy) of Northern Train Limited's Station Licence and GB Statement of National Regulatory Provisions: Passenger**

Well-trained staff are essential for an accessible railway. Disability awareness training is intended to equip staff with the tools to better understand the needs of disabled passengers, and how these can best be met to support their journeys on the rail network. All operators must set out, and comply with, commitments to provide disability awareness training for passenger-facing staff in their Accessible Travel Policy (ATP), which is underpinned by Condition 5 of the Station Licence and GB Statement of National Regulatory Principles (SNRP): Passenger obligations.

ORR wrote to Northern Trains Limited (Northern) on 4 December 2025 to inform the company that we had launched an investigation into whether Northern had contravened or is contravening Condition 5 (Accessible Travel Policy) of its GB Statement of National Regulatory Principles (SNRP): Passenger and Station Licence.

Our investigation has focussed on:

- The timeframe over which staff who had not received required disability awareness 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:
  - the recent training has been effective and is enabling staff to meet the required training outcomes; and
  - a similar situation will not arise in future.

We have also considered:

- the steps Northern has taken or is taking to address the issues, and make improvements;
- whether there are any systemic issues; and/or any mitigating factors which should be considered.

We thank Northern for its very constructive and open engagement with us and for providing information over the course of this investigation. ORR has considered evidence, including Northern's submissions and responses, and material provided to us in our meetings. We are publishing our investigation report alongside this decision letter, which details the assessment of evidence that ORR has undertaken in arriving at its decision.

In its submissions, Northern set out details of an improvement plan, which has the stated aim of delivering compliance with Condition 5 (ATP) of Northern's licences and aims to ensure that relevant staff receive required disability awareness training. Northern also proposed a suite of reparations in acknowledgement of its failings. We welcome these actions that Northern has committed to take because of our licence investigation, and which will lead to better experiences for disabled passengers when travelling with Northern.

This letter sets out the decisions made by the ORR Board on what regulatory action should be taken following the investigation. In reaching these decisions, the ORR Board had regard to its duties under section 4 of the Railways Act 1993.

ORR has also applied our competition primacy duty which obliges ORR to consider whether it would be more appropriate to proceed under the Competition Act 1998. In this case, ORR does not consider that the Competition Act 1998 is applicable.

Stephanie Tobyn, Director of Strategy, Policy and Reform, wrote to Northern on 23 January 2026 setting out the findings of our investigation and asked for any representations from Northern. The Board considered Northern's response to ORR's letter, and the supplementary information provided on 4 February 2026.

### **Summary of decision**

Having considered all relevant circumstances including all the evidence, representations, our economic enforcement policy and penalties statement and section 4 duties, the ORR Board has determined that Northern has contravened, and is contravening, Condition 5 of both its Station Licence and GB SNRP: Passenger.

In particular, it has failed, and is failing, to comply with commitments made in its published Accessible Travel Policy to provide disability awareness training for staff

and to provide the management and oversight arrangements that would support and assure delivery of that training.

### **Reasons for this decision**

The ORR Board's reasons for determining this are:

- Northern has not been fully complying with the commitments set out in its published ATP to provide disability awareness training for station staff since its ATP was first established in 2021.
- Northern did not make ORR aware of gaps in provision of disability awareness training until it reported data under new reporting requirements in August 2025.
- Training undertaken by Northern in October 2025 went a significant way towards closing the training gap for station staff. However, a gap remains for some staff with respect to one of the mandatory training outcomes (outcome 9) which Northern aims to resolve by July 2026. There is therefore an ongoing issue.
- In addition, until systemic issues relating to governance processes, monitoring and controls are addressed there is an ongoing risk that similar issues with disability awareness training could re-occur.
- Northern has set out actions that it has agreed to take and is taking aimed at resolving systemic issues. These are tailored to address the issues identified in Northern's own internal audit with some actions already complete, most to be completed by the end of March 2026, and the full plan largely delivered by end July 2026.

In reaching this decision, ORR's Board considered carefully the evidence compiled as part of the investigation. It recognised that Northern has been open and admitted failings in delivering its obligations and is now taking steps towards addressing systemic issues. These include the development and implementation of its improvement plan. Northern has also offered a suite of reparations.

### **Consideration of enforcement action**

#### *Consideration of a final order*

Having identified a current breach, the Board then had to consider whether a final order was appropriate in this case.

Our Board has taken account of the evidence, our economic enforcement policy and penalties statement, and our section 4 duties in considering the application of a final

order under section 55 of the Railways Act 1993. This includes whether there are any relevant exceptions which could apply in this case.

Having considered the exceptions under the Act, the ORR Board determined there were grounds in this case not to make an order under section 55 of the Act as:

- (a) Northern has agreed to take, and is taking, all such steps as appear appropriate to ORR for the purpose of securing or facilitating compliance with its ATP commitments relating to disability awareness training.
- (b) ORR is satisfied that an enforcement order would not, at this stage, deliver a better result than would be achieved by delivery of Northern's improvement plan.

The Board considered the plan that Northern has put forward with the stated objective of delivering compliance with Condition 5 (ATP) of its licences, and its progress with delivering that plan are grounds for applying the exception in section 55(5B) (a) of the Railways Act 1993 to this case. ORR has assessed the plan and considers it to be comprehensive and well-targeted at tackling systemic issues relating to governance, oversight and delivery of disability awareness training. The actions set out, once delivered, offer confidence that Northern will be able to meet and demonstrate that it is meeting the commitments set out in its ATP relating to delivery of disability awareness training for staff and provision of management and oversight arrangements to support and assure delivery of that training.

In accordance with section 55(6) of the Railways Act 1993, enclosed with this letter is ORR's formal notice setting out in more detail this decision and the reasons for it.

In reaching this decision, we require Northern to continue to implement and deliver its improvement plan (as submitted to ORR on 17 December 2025) in line with any timings set out in that plan. We will continue to closely monitor progress and will publish a report on Northern's progress in delivering its plan after the end of July 2026, when almost all actions are expected to be complete.

#### *Consideration of financial penalty*

Having determined a breach, the Board also considered whether a financial penalty was appropriate. ORR's policy sets out that our primary objective in setting a penalty is to change the future behaviour of an offender so as to deter non-compliance with its obligations (both specifically and in general). We also aim to incentivise others subject to similar obligations to comply with them.

Having considered our [ORR's economic enforcement policy and penalties statement](#) including the Macrory principles (page 30), and Section 4 duties, the Board determined that a penalty is not appropriate in this case, taking into account the steps that Northern is already taking to secure future compliance, the dependency on public funds, and the package of reparations offered.

## *Reparations*

During our investigation Northern offered a suite of reparation initiatives in acknowledgment of its responsibility, and which are intended to represent a commitment to repair and a foundation for improved standards of customer service delivery. It values its proposed initiatives at c.£550k and has committed to complete delivery of all the initiatives by March 2027.

The package includes a diverse mix of initiatives. It includes activities to strengthen the training offer intended to go beyond its regulatory commitments (e.g. additional face to face lived experience training for 150 staff) and to support the delivery and impact of training (e.g. people resources to accelerate delivery of the improvement plan, and an internal awareness campaign), additional activities to provide assurance on training outcomes (e.g. third party audit, additional mystery shops in each rail period), and direct passenger facing activities (e.g. a travel offer for disabled railcard holders).

The Board considered this offer having regard to its suitability against the four criteria (genuinely additional, appropriately targeted and proportionate to the harm caused, deliverable, and providing value for money) set out in ORR's economic enforcement policy and penalties statement. It considered representations from DfT (on the first criterion), and the Disabled Persons Transport Advisory Committee and Transport Focus (on the second criterion) in reaching its decision.

The Board decided to accept the reparations package offered by Northern. The Board considered this package of initiatives would help to provide better outcomes for disabled passengers and build on Northern's proposed improvements in passenger experiences.

We will work with Northern, and relevant stakeholders where appropriate, to finalise the details of the reparations package, in particular with respect to the travel offer for disabled railcard holders. We will closely monitor and report on Northern's progress in delivering its reparations package in line with our economic enforcement policy.

## **Section 55 Notice**

As set out above, in accordance with section 55(6) of the Railways Act 1993, enclosed with this letter is ORR's formal notice setting out the exemption and reasons for this, which we will serve on Northern by registered post.

We consider that the actions that Northern has committed to take because of our licence investigation will lead to better experiences for disabled passengers when travelling with Northern. Northern's failure to deliver against its improvement plan in the timescales provided and/or not to deliver its reparations package of initiatives may result in further enforcement action.

I am copying this letter to Gary Bogan, Managing Director at Rail North Partnership.



A copy of this letter, notice and associated investigation report and relevant correspondence will be published on our website.

Yours sincerely

**Stephanie Tobyn**  
Director of Strategy, Policy and Reform