

Purpose and Background

Welcome to EMR's Delay Repay Continuous Improvement Report for 2025/26, covering the period 01 April 2025 to 31 March 2026. This provides a summary of steps taken by EMR to improve passenger awareness of delay compensation and the claim process, in accordance with the Delay Compensation Code of Practice. Whilst some actions taken by EMR in 2025/26 satisfy multiple requirements of the Delay Compensation Code of Practice, each step has been aligned to a specific clause for ease of reference.

3.1. Licence holders must ensure that information about delay compensation is clearly available to passengers; before their journey, in the course of their booking or purchase, and during and after their journey

Online

To support customers in submitting compensation claims correctly at first instance, EMR utilises automated email responses for customers who contact us regarding a delay. This template has recently been updated to include additional information in response to identified trends in customer complaints.

The updated email provides guidance on how to submit a claim, how to appeal a decision, what to do where tickets are no longer available, and how to proceed where multiple passengers are travelling.

In addition, a full review of the main EMR website is currently underway to improve the customer experience when submitting Delay Repay claims.

3.6. When there is delay or disruption, licence holders must make reasonable efforts to proactively inform passengers that they may be eligible for delay compensation. Such steps include, as appropriate:

In-train distribution of delay compensation details

When services are delayed, onboard teams make announcements advising customers that they may be eligible for compensation. Service Resolution books have been introduced for onboard teams to support this process. During periods of significant disruption, these enable staff to provide passengers with a QR code that links to the information required to submit a compensation claim. This approach also supports the identification of passengers on affected services where additional compensation may be required beyond standard Delay Repay provisions.

4.1 Licence holders must process correctly completed claims within 20 working days, from receipt of claim to communication of decision and payment, where relevant. ORR will monitor performance on timescales, and will from time to time review whether this requirement remains appropriate.

In times of significant disruption, EMR will utilise the batch processing functionality within the Delay Repay system. This ensures that any customer with a claim relating to a specific service, where the claim has been correctly entered into the system, is automatically processed.

While the system already includes automation, this approach ensures that eligible customers are not subject to additional manual checks following an already severely disrupted journey. Where a claim is flagged by fraud detection controls, it is referred to an agent for further review.

5.1. ORR expects licence holders, individually and collectively, to continue seeking to improve the service that they provide to respond with innovation to the opportunities and challenges presented by technology and passenger expectations

To improve customer service, where claims exceed the £50 automation threshold, approval limits have been introduced for senior members of the Customer Service Centre. Previously, these approvals were managed solely by the Delay Repay Team at Solvd.

The introduction of these delegated limits enables claims to be approved at the point of contact, either by telephone or email, provided all required information is available and correct. This removes the need to refer cases to a separate team, improving processing efficiency and customer experience. Customers receive immediate confirmation of claim approval via email, providing assurance that their claim has been processed.

Further work is underway to increase the standard automation threshold to £60, enabling a greater proportion of claims to be processed automatically at first instance.