



# Making *Delay Repay* work for passengers

# Executive Summary: *Delay Repay*

Getting rail retail right is critical for the millions of passengers who rely on it every day.

Independent rail retailers play a key role in helping consumers navigate a complex system, save money on fares, and travel with confidence. Collectively, they generate around £5 billion in ticket sales each year, helping the Government to boost revenue and cut costs. These retailers are often on the front line of innovation, making the ticketing experience smoother and more transparent through better tools, clearer choices, and personalised support.

But when things go wrong and when journeys are delayed, passengers are left navigating a fragmented and overly complex compensation process. Despite selling over £5 billion in train tickets annually and delivering industry-leading customer solutions, third-party retailers are currently excluded from processing Delay Repay claims for the passengers that they serve.

This paper sets out the case for allowing independent rail retailers to assist in the process for handling Delay Repay compensation claims on behalf of passengers by working closer with train operators, a move that would simplify and modernise the current system, reduce barriers to claiming, and improve the passenger experience.

**As part of its flagship rail reform agenda, the Government now has a once-in-a-generation opportunity to fix the fragmented nature of Delay Repay. By placing a commitment to equal access to Delay Repay at the heart of the forthcoming Railways Bill, passengers will see a commitment from Government and industry working together to move on from an outdated, fragmented and unfair compensation system, bringing the system in line with modern consumer expectations.**

As one of the most widely requested features from passengers, parity of access to Delay Repay can be a visible proof point of how the Government's rail reform agenda can deliver a better passenger experience. It is the number one issue raised with independent retailers, with passengers calling for a simple, fair and automatic compensation process when things go wrong.

Currently, passengers must navigate a confusing system, which includes identifying the correct train operator and then manually submitting a claims form. Allowing third-party retailers to submit compensation claims on behalf of customers with their authorisation would:

- Simplify the process by removing unnecessary steps.**
- Enable automated and pre-populated claims, saving time and enabling efficiency.**
- Ensure more accurate and complete claim data is made available to the operators which will result in lower processing costs.**
- Build trust between passengers and the rail industry.**
- Help reduce fraud through unified processing.**
- Support a level playing field between independent and incumbent rail retailers.**

This is a key moment in rail reform; there is opportunity to not only get the legislative framework right, but also to work pragmatically with individual train operating companies to ensure progress is made in practice.

**Unlocking Delay Repay is not just a technical fix – it is a practical, cost-effective reform that would demonstrate rail reform is genuinely passenger-first.**



**Anthony Smith**  
Chair, Independent Rail Retailers

# Introduction: *Delay Repay*

When a customer's train journey is meaningfully delayed, they are generally entitled to compensation.

The exact level of reimbursement varies between operators and contexts, but in general, the proposition is:



This scheme is known as "Delay Repay". Most operators are mandated to offer such a scheme through a mix of licence conditions and their contracts with the Government. A key metric of the scheme's effectiveness is the proportion of eligible journeys for which compensation is claimed.



# Current *claim* process

Current processes require passengers to claim compensation from the train company responsible for the delay.

The train company verifies that the customer held a valid ticket and confirms the details of the claimed delay. Once approved, compensation is paid directly to the customer by the train company. There are three main claims processes:



**Manual claims** - Customers complete a paper claim form or write a letter, and submit it to the train company, either by post or by handing it in at a station, along with the relevant tickets.



**Online claims** - Customers submit a claim through an online form, along with photos or screenshots of their tickets.



**“One click” claims - (sometimes called “automated claims”)** The train company notifies the customer that they are entitled to compensation and invites them to click a button to make a claim. The journey and ticket details are populated automatically, and no additional evidence needs to be submitted.

# Current rules leave passengers *behind*

Independent retailers are currently restricted in their ability to support customers with Delay Repay claims, limiting passengers’ ability to receive the compensation they are rightfully owed.

While train companies offer one-click or automated claims for tickets purchased via their own channels, independent retailers are not permitted to provide the same service. As a result, customers who purchase tickets through independent retailers are notified of their entitlement but must then submit claims directly through the train company’s online portal, often manually re-entering ticket details.

This creates a disparity in service quality: customers who purchase through independent retailers experience a more complex process compared to those who buy directly from a train company. It also limits an independent retailer’s ability to provide a fully integrated experience, placing them at a competitive disadvantage.

Consumers may struggle to navigate this process for a range of reasons - from varying levels of digital literacy and confidence in using online systems, to limited time or understanding of the steps required. For some, the need to manually enter details and switch between multiple platforms can cause confusion or frustration, particularly when expectations are set by more seamless digital experiences elsewhere. In practice, this means that many eligible passengers may miss out on the compensation they are entitled to, simply because the process feels too cumbersome or unclear.



# The case for *change*

Allowing independent retailers to play a greater role in the Delay Repay claims process would provide a cost-effective solution that delivers tangible benefits for passengers and train operators.

It would:

**Simplify processes and prevent passengers from being redirected between retailers and operators.**

**Make claiming quicker and more straightforward.**

**Enable more automation of the claim process and thus reduce processing costs incurred by train companies.**

**Facilitate greater innovation and the adoption of automated payment methods.**

**Enhance passenger satisfaction and trust.**

**Reduce the risk of fraud.**

**Enable third-party and railway retailers to compete on a more level playing field.**

Currently, third-party retailers are not permitted to submit Delay Repay claims on behalf of passengers, despite selling tickets and being able to process refunds for unused tickets. As a result, some passengers who approach a retailer for compensation are redirected to the relevant train company, causing frustration. Others must determine which train company to claim from; a process that can be confusing, particularly when journeys involve multiple operators. Passengers are then often required to create a Delay Repay account with the train company before submitting their journey details, adding further complexity.

Allowing passengers to submit a claim directly through the organisation that sold the ticket – whether that is an independent retailer, a train company, or, in the future, Great British Railways – would significantly streamline this process. Passengers would no longer need to identify the correct operator, set up multiple accounts, or re-enter ticket information already held by the retailer. The claim could then be automatically passed to the correct train operating company for processing, making claiming easier for customers, reducing the risk of errors, and saving money in administration and processing costs. This approach would save both time and friction, moving rail closer to a genuinely integrated customer experience in which journey planning, ticket purchase and compensation are managed seamlessly in one place.

Research conducted by the Department for Transport in 2023 indicated that only 47%<sup>1</sup> of passengers entitled to compensation submitted a claim. The proportion was even lower for delays of 15–29 minutes, with just 35% of eligible passengers claiming. These figures indicate clear barriers within the current system.

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For delays of 15-29 minutes, just **35%** of passengers entitled to compensation submitted a claim

1. Department for Transport, Rail Delays and Compensation 2023: [www.gov.uk/government/publications/rail-delays-and-compensation-2023](https://www.gov.uk/government/publications/rail-delays-and-compensation-2023)

## 1. Driving innovation and simplicity



Independent rail retailers have a proven track record of innovating and creating simple, intuitive, and cost-effective processes that make transactions easier for consumers. These capabilities could be extended to Delay Repay through automated or one-click compensation models. Under such a system, passengers would receive a notification of potential eligibility and be directed to a pre-populated claim form, requiring only confirmation and a single click to submit. Some train companies already offer this functionality to customers who purchase directly from them. Extending equivalent capability to independent retailers would create consistency across the market and ensure all passengers benefit from the same streamlined experience, regardless of where they purchase their ticket. The objective is to ensure that consumers are not deterred from exercising their rights by unnecessarily complex or fragmented processes.

## 2. Trust and satisfaction



While some train operators already provide automated compensation, the Department for Transport reports that only 23% of passengers received compensation automatically. The remaining 77% are required to submit claims manually. The Labour Party's "Get Britain Moving" policy document explicitly identifies the improvement of automatic delay and cancellation refunds as a priority. Enabling third-party retailers to support claim submissions represents a swift and cost-effective means of achieving this objective, while improving passenger satisfaction and trust.

Research by Transport Focus shows that fairness, clear communication and visible support drive higher levels of passenger trust. Proactively notifying passengers of their entitlement and making the claims process simple directly reflects these principles.

## 3. Reducing fraud and enhancing efficiency

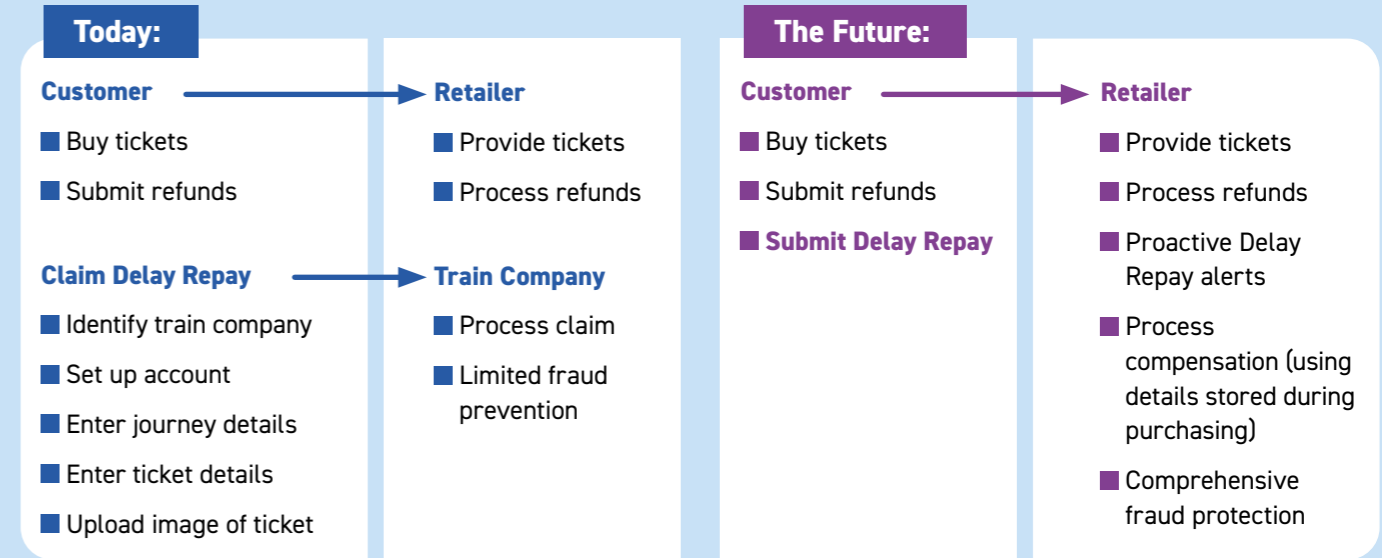


Beyond passenger benefits, establishing a more integrated claims process could also reduce fraud, a significant concern for the industry. Allowing retailers to submit claims through structured, verified systems would enable more comprehensive validation checks. This could help prevent duplicate claims for the same journey submitted to different operators, or instances where a passenger seeks both a refund and delay compensation for the same ticket. It would also support improved monitoring of individuals with a history of repeat or suspicious claims. Collectively, these measures would reduce fraud and contribute to a more efficient and cost-effective railway system.

DfT research in 2023 indicated that only **23%** of passengers received compensation through automated means

with the remaining **77%** required to submit claims manually

## Delay Repay: Current Process vs Future Process



## Conclusion

Authorising third-party rail retailers to submit Delay Repay claims on behalf of passengers would simplify the process and strengthen confidence in the system by ensuring that compensation is accessible, consistent, and customer-focused. Passenger experience is a key priority, and consumers would benefit from a more seamless and transparent process strengthening their sense of fairness and reinforcing their rights when things go wrong.

At present, independent rail retailers do not have full access to all products and services: certain tickets can only be purchased directly from train companies, and services such as Delay Repay cannot be offered at all. This creates a clear competitive disadvantage, as rail operators can provide products and services that third parties cannot match. Restricting third-party retailers in this way undermines competition and risks deterring private investment and innovation – both of which are essential to driving revenue growth, reducing costs, and improving the passenger experience in line with Government objectives.

To deliver a railway that is fair, innovative, and genuinely passenger-focused, it is essential that third-party retailers must be able to submit Delay Repay claims on their behalf.

The Government's rail reform agenda is intended to create a passenger-first railway ecosystem. Putting parity of access to Delay Repay on the face of the forthcoming Railways Bill is a simple, clear way of proving that promise from day one. The Government should seize this opportunity to deliver a system that is **fair, modern, and genuinely consumer-focused.**



# Our *Members*

Our members are diverse in scale and focus.

**assertis**

Pioneers of  
barcode ticketing

**atomised**

Employee owned  
cooperative

**evolvi**  
Rail Systems

Smart rail solutions for  
business travel

**FastRailTicketing**

Efficient scalable  
services

**MyTrainTicket**

Cross-selling rail  
to businesses

**OnTrack**

Powering GB's largest  
train operator

**omio**

International  
travel experts

**raileasy**

Pioneers of  
split ticketing

**trainline**

GB and international  
rail specialists

**Trip.com Group™**

Travel experts with  
global reach

Independent Rail Retailers are Britain's Rail Growth Partners –  
*boosting revenue, cutting costs*