

BRIEFING · OCTOBER 2026

Artificial Intelligence in *UK Passenger Transport: Rail, Aviation and Maritime*

What the evidence says about compensation, disruption and assistance as AI arrives in passenger services, where AI is already at work across the operation, what the regulators expect, and what an operator can safely do now. Aviation and maritime figures cover the United Kingdom. Rail figures cover Great Britain, where the Office of Rail and Road regulates; Scotland's lifeline ferries are commissioned by Transport Scotland.

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Prepared as a market briefing. Every figure is traced to a regulator, official statistics, Parliament, a government department, a court, an operator on its own record, or the statute book.

A note on the numbers

This briefing is built from what can be checked, and it names what was left out.

Passenger transport is full of confident numbers about AI: minutes of delay saved, claims processed automatically, accuracy rates for fraud detection. Almost all of them come from the companies selling the systems. Every figure here traces instead to the Civil Aviation Authority, the Office of Rail and Road, the Maritime and Coastguard Agency, the Department for Transport, official statistics, a court, Parliament, an operator speaking on its own record, or the statute book. No supplier performance figure is used.

NAMED AND EXCLUDED: THE MOST QUOTABLE NUMBERS IN THE SECTOR

A widely circulated case study says UK train operators automate "93% of claim processing" and detect fraudulent compensation claims "with 70% accuracy" using machine learning. No operator is named and no evaluation is published, so it is excluded. So are the minutes of delay an airline said its AI tools had saved, given at an industry conference without a method, and a supplier's satisfaction and repeat-purchase figures for an airline disruption product.

FLAGGED, NOT HIDDEN

The CAA's complaints data counts disputes that reached one of the two approved alternative dispute resolution (ADR) bodies or the CAA's own Passenger Advice and Complaints Team. It is not a count of every complaint. The CAA warns that a lower uphold rate may mean airlines are resolving more complaints before they reach ADR. And the largest ADR body records no complaints at all under the disability rights regulation, which says more about how complaints are categorised than about service. All three caveats travel with the figures.

WHERE AN ABSENCE IS REPORTED

Several findings here are absences: words that do not appear in a plan, data that has not been published, statements no airline has made. Each was searched for, and each is stated as what was searched and when. Operators are named only where a regulator, an ADR body's published data, a court or a law-enforcement agency names them, or for what they say about their own systems.

Sources for each figure are given at the foot of the section in which it appears, and listed in full in section fifteen.

The wider market

More people are travelling than ever, and more of the experience is measured than ever.

302m

Passengers through UK airports in 2025, the busiest year on record

461m

Rail journeys in Great Britain, April to June 2026, up 2% on a year

57.3m

Sea passengers in 2025, 39.2m of them on domestic routes

UK airports handled 302 million passengers in 2025, up from 295 million in 2024, and 73 per cent of flights operated on time, six points better than the year before. The CAA's consumer survey found 88 per cent of passengers satisfied with flying, the highest since the survey began in 2016, and satisfaction with how complaints were handled rose ten points to 72 per cent. On the railway, 461 million journeys were made in Great Britain between April and June 2026. At sea, 39.2 million passengers travelled on domestic routes in 2025 and 18.1 million internationally, 3.1 million of them on cruises.

The strength of the position is the record. The rail regulator publishes official statistics on every compensation claim operators close, every complaint, and every assistance request booked or made at the station. Rail operators closed 99.1 per cent of 3.8 million compensation claims within 20 working days this spring and summer. The CAA publishes, quarter by quarter, every dispute that reaches its approved ADR bodies, by airline and by outcome. Scotland's lifeline ferry operator reports against published targets for reliability, trust and accessibility.

WHY THIS MATTERS TO AN AI PROGRAMME

The evidence an AI programme needs is already collected. It shows exactly who the system fails, and when.

Most AI in passenger services is sold as faster, cheaper handling: quicker compensation, automated rebooking, an assistant that answers at three in the morning. The public record already shows where the current system breaks down. That is the test any new tool should be held to.

CAA, UK aviation officially breaks records with over 300m passenger journeys in 2025, 24 February 2026; New CAA data suggests 2026 will be another year of growth, 9 February 2026 · ORR, Passenger rail usage, April to June 2026, 1 October 2026; Delay compensation claims, rail periods 1 to 4, 15 October 2026 · DfT, Sea passenger statistics: overview 2025, 29 July 2026.

The pressure point

The claim is getting faster. The passenger who needs a person is not.

Disruption is where passenger transport is tested. Between April and July 2026 the number of trains cancelled in full or in part on Britain's railway rose by a third on a year earlier, and station stops reached more than 15 minutes late rose by 39 per cent. Operators closed 3.8 million delay compensation claims in the same four rail periods, 55 per cent more than a year before. At that volume, compensation is being automated, and for most passengers that is good news.

For one group it is not the whole story. The rail regulator's annual survey of more than ten thousand people who booked assistance found that 77 per cent received all the help they booked, 12 per cent some, and 10 per cent none. When the train was disrupted, the numbers fell sharply.

86%

Of passengers with booked assistance were met when their service ran without disruption

67%

Were met when their train was cancelled; 73% when it was delayed

63%

Were satisfied with Passenger Assist when their service was cancelled

The regulator's own conclusion: "These findings suggest that Passenger Assist is more unreliable when services are disrupted." The aviation regulator reached the same view in the same year from different evidence: "Experiences of delay or disruption had a disproportionately negative impact on satisfaction for passengers with accessibility needs, particularly where communication was unclear or onward connections were involved." The Department for Transport's aviation accessibility group, reporting on the day this briefing was finished, put it in human terms: the impact of delays and cancellations "is much greater on many disabled passengers with concerns about access to medication, availability of toilets, time constraints on personal assistants and accessible accommodation".

THE SQUEEZE

Disruption is the moment operators most want to automate, because volume peaks. It is also the moment the passenger with an assistance booking most needs a person, and the moment the current system already most often fails them.

ORR, *Delay compensation claims, rail periods 1 to 4, 1 April to 25 July 2026*, 15 October 2026 · ORR, *Experiences of Passenger Assist 2025-2026* (M·E·L Research, 10,191 respondents), July 2026 · CAA, *Airport Accessibility Performance Report 2025/26* (CAP3264), August 2026 · DfT, *2026 Aviation Accessibility Implementation Group Annual Report*, 19 October 2026.

What the sector is facing

Two volumes rising together: claims for compensation, and requests for help.

Compensation as a volume business

In rail, 83.6 per cent of the 3.8 million claims closed between April and July 2026 were approved, and 99.1 per cent were closed within 20 working days. The same release records something small and telling: a change to one operator's customer contact system "resulted in a number of delay compensation claims being closed automatically", historic claims still awaiting information from the passenger. "The precise number of claims affected is unknown." In aviation, 51,691 disputes reached the two ADR bodies or the CAA in the year to March 2026, 9 per cent more than the year before, while passenger numbers grew about 2 per cent. 91 per cent of them concerned rights to compensation, care and rerouting after delay or cancellation, and £12.2 million was awarded through the ADR bodies.

First answers that do not stand

Of 46,597 aviation disputes decided in the year, 21,177, or 45 per cent, ended with a remedy for the passenger, either settled by the airline once the dispute was raised or decided in the passenger's favour. The year before it was 54 per cent. The CAA notes that the rate can fall because airlines resolve more complaints before they reach ADR, leaving harder cases. Either way, for tens of thousands of passengers a year the airline's first answer did not stand.

Gaps that do not close

The rail regulator's research says the share of passengers who receive none of the help they booked is consistent year on year, and that "this consistency indicates that the same delivery gaps continue to affect a minority of passengers each year". In December 2025 its first benchmarking report placed Northern, South Western Railway and West Midlands Trains lowest for reliability. In March 2026 it found Northern in breach of its licence after "significant historic gaps in training" for passenger-facing station staff, and its Board "determined that a penalty was not appropriate in this case". Redress is barely used where it matters most: only about one passenger in ten who was not fully assisted claimed compensation, and lack of awareness was the main reason.

Maritime: the thinnest record

The Maritime and Coastguard Agency is the UK's national enforcement body for sea passenger rights, including assistance for disabled passengers and treatment during delay and cancellation. A search of GOV.UK on 19 October 2026 found no enforcement or activity report since 2019. Scotland's lifeline ferry operator publishes the most detailed record: in its first contract period, October 2025 to March 2026, reliability was 87 per cent against a 90 per cent target, and customer satisfaction was "pulled below target during periods of significant disruption".

ORR, *Delay compensation claims*, 15 October 2026 · CAA, ADR and PACT passenger complaints data, FY25 and FY26 (data correct at 3 June 2026) · ORR, *Experiences of Passenger Assist 2025-2026* · ORR, *Annual rail consumer report 2025 to 2026*, 9 July 2026 · MCA, *Business Plan 2026 to 2027*, 16 October 2026 · CalMac, *Annual performance report, contract period 1*, 16 October 2026.

The challenges of using AI here

Where AI is arriving, what evidence comes with it, and four risks that have nothing to do with the technology failing.

Where AI actually is

The railway's own plan. The rail industry's first joint AI action plan, launched in April 2026 by GBRX, the technology body preparing for Great British Railways, sets out the passenger ambition directly: "Automating routine customer facing tasks by simplifying complex rules such as re-routing, ticket changes or compensation eligibility, and enabling faster, more consistent responses." It reports that "machine learning is also being used to remove fraud from the Delay Repay scheme, enabling customers to be reimbursed on the same day as submitting a claim." Its guidance for passengers on the move would predict "emerging delay signals, likely missed connections, recommended alternatives", and "once in place, this foundation can support further capability such as crowding prediction, proactive station management and tailored accessibility support." A search of the plan's text on 19 October 2026 found no use of the words "disabled", "disability", "Passenger Assist", "equality" or "vulnerable".

The regulators. The ORR plans to use AI on its own complaints and passenger assistance data. The CAA says it will spend 2026/27 learning how AI is used: it will "map AI use cases across different parts of the sector" and "assess how widely and rapidly AI is being adopted". No UK airline statement describing its passenger-facing AI was found. At the border, the Home Office is introducing contactless eGates, facial comparison without placing the passport on the reader, at all UK airports by early 2027.

Four risks specific to passenger transport

01 · RECOVERY THAT DROPS THE ASSISTANCE BOOKING

The industry plan puts tailored accessibility support after the prediction foundation is built. A rebooking or recovery tool that does not carry the booked assist with the rebooked passenger fails the person the regulators say disruption hurts most.

02 · A CHATBOT THAT MISSTATES SOMEONE'S RIGHTS

An airline told a tribunal its chatbot was responsible for its own answers. The tribunal: "It makes no difference whether the information comes from a static page or a chatbot."

03 · A RECORD THAT DOES NOT SEE DISABLED PASSENGERS

106 of 51,691 aviation disputes are logged under the disability rights regulation, and the largest ADR body logs none. A model trained on that record learns that disabled passengers rarely complain.

04 · PRICES THAT DO NOT SEE CIRCUMSTANCES

The Dutch competition and consumer regulator found 30 to 35 different prices paid for the same base ticket, and warns the pricing algorithm does not take account of a person rebooking at the last minute after a cancellation.

GBRX, *Artificial Intelligence in Rail: The Industry Action Plan* (text searched 19 October 2026) · ORR, *Safe AI Innovation Action Plan 2026*, 29 May 2026 · CAA, *Artificial Intelligence* (strategy page, read 19 October 2026) · GOV.UK, *Contactless travel using eGates*, 6 October 2026 · *Moffatt v. Air Canada*, 2024 BCCRT 149 · ACM, summary of market investigation, 29 September 2026.

Beyond the passenger: AI across the operation

Much of the AI already in use in transport sits in the operation the passenger never sees, not at the ticket office.

The rail industry's AI plan covers network operations, planning, rolling stock, infrastructure and the back office as well as the passenger. None of the examples below has a published evaluation of benefit, and the plan itself warns that "many AI pilots struggle to produce measurable financial benefit", so none is quantified here.

Recovery	The rail plan's incident pathfinder aims at "the likely trajectory of an incident", so that "the same prediction" can be used "across control, customer information, crew and rolling stock planning". LNER already runs a machine learning tool across its stations that "identifies services at risk of delay". On 8 September 2026 a software defect in the air traffic control system, not AI, left more than two days of backlog and "hundreds of thousands of passengers' travel plans disrupted": the cost of one fault in a shared system.
Planning and modelling	Automated timetable generation is a rail pathfinder, and LNER uses "a timetable checking agent" to validate short-term plan changes "before tickets are released for sale". In aviation, a £5 million programme part-funded by the Department for Transport is using AI models to find where small altitude changes over the North Atlantic avoid warming contrails; trials run over the next two winters.
Assets and maintenance	Predictive models for "doors, engines, HVAC compressors or traction converters" aim to reduce "cancellations and short forms linked to avoidable defects". Computer vision on trains looks for track defects, vegetation and drainage problems. Train-borne AI cameras are being installed across 32 Southeastern trains. The productivity case is on the regulator's record: train kilometres per Network Rail employee are 17 per cent lower than a decade ago.
Safety and security	AI-powered CCTV cameras at Lewisham station "automatically detect trespass incidents and passengers in distress". At Dingwall, which averaged five trespass incidents a day, warning cameras brought "a big drop", with no figure given. British Transport Police publishes a register of every live facial recognition deployment: 27 at London rail and Underground stations between February and September 2026, an estimated 927,000 faces, five alerts and no arrests.
Tracking and turnaround	Heathrow is installing cameras across its stands and "using AI to analyse data captured" to speed turnaround between flights, with full coverage expected by the end of 2026. Rail's train running data sits in Darwin, "the single source of truth".
Maritime and regulators	The Maritime and Coastguard Agency's AI strategy is due by March 2027, with AI projects proposed for vessel regulation and coastguard training, and a trial arrangement for autonomous surface ships in the Plymouth area. The CAA is testing AI to sort the "tens of thousands" of mandatory occurrence reports it receives each month. The ORR plans AI on its own complaints and assistance data.

WHERE THE OPERATION MEETS THE PASSENGER

The industry's own design uses one prediction for the whole incident. That is where the assistance booking belongs.

If control, crew, rolling stock and customer information act on the same prediction, the passenger with booked assistance should be in it from the start.

GBRX AI action plan · NATS, 18 August and 18 September 2026 · Network Rail, 29 April and 9 June 2026 · ORR productivity report, March 2026 · BTP LFR Deployment Register (faces summed from its estimates) · Heathrow, December 2025 · MCA business plan 2026-27 · CAA.

The threat side

In this sector the threat runs against the compensation scheme, and the operator's answer is a model.

In insurance the threat was fraud against the insurer. In social housing it was better-equipped claimants. In energy retail it was impersonation of the redress body. Each was established from that sector's own evidence rather than carried over, and passenger transport is different again. The primary-sourced threat here is fraud against compensation schemes, and the industry's response is already a machine learning model that decides which claims are paid at once.

RAIL · THE INDUSTRY'S OWN ACCOUNT

"Machine learning is also being used to remove fraud from the Delay Repay scheme, enabling customers to be reimbursed on the same day as submitting a claim." Same-day payment for most passengers is a real gain. What the plan does not describe is what happens to the genuine claim the model holds back, how long it takes to reach a person, or how often it happens.

AVIATION · ONE SHARED SYSTEM

A cyber incident at Collins Aerospace, reported on 19 September 2025, disrupted flights at Heathrow and other European airports over a weekend. The National Crime Agency arrested a man on suspicion of Computer Misuse Act offences. It was not AI-enabled. It shows how many airports depend on a few shared passenger systems.

Two other threats were looked for and not used. Fake airline "customer service" accounts that answer stranded passengers on social media have been reported by a consumer organisation and by security companies, but the most recent UK investigation found is from June 2024 and no UK regulator or police force has published on it since. Claimants using general AI tools to draft compensation claims at volume may well be happening; no evidence of it was found.

THE QUESTION FOR THE READER

Fraud against compensation schemes is real. So is the genuine passenger held back by a false flag.

An operator that cannot say how many genuine claims its fraud model held, and how long they took to reach a person, cannot show the model is fair. The passenger most likely to be held back, by unusual journeys, assistance needs or a claim submitted by someone else on their behalf, is also the one least likely to chase it.

GBRX, *Artificial Intelligence in Rail: The Industry Action Plan* · National Crime Agency, *UK arrest following aerospace cyber incident*, 24 September 2025 · Which?, *Travel scams: airline customers targeted by fake accounts on X*, 10 June 2024 (context only).

The UK legal position

There is no AI rulebook for passenger transport. The line is drawn anyway.

The regulators' stated positions

The CAA's Consumer and AI Principles, published in April 2025, pair five AI principles with its consumer principles. The fifth: "People must be able to challenge decisions made using AI-based systems that affect them. This requires accessible dispute processes, clear routes for appeals, and fair systems for addressing concerns." The guidance asks firms to "ensure appropriate human oversight", and says chatbots and automated booking systems need "confidence that these services are better for consumers than those already available". It describes itself as starting points, not requirements. The ORR's position, May 2026: "Our role is not to regulate AI itself, but to ensure that the use of AI for regulated activities remains transparent, governable, auditable and consistent with regulatory outcomes and statutory obligations." Its digital safety strategy, published on 28 September 2026, adds that where system logic "is not transparent or repeatable, risks may be harder to understand".

Redress for a failed assist

The ORR's guidance on accessible travel policies requires that redress when booked assistance is not provided "must be determined on a case-by-case basis to allow operators to consider the circumstances of the case". Its draft framework, consulted on until September 2026, sets out the factors: the nature of the failure, its impact on the passenger, and how the operator responds. In rail this is the one compensation decision the regulator expressly says needs judgement.

Two bills before Parliament

The Civil Aviation (Consumer Protection and Regulatory Reform) Bill completed its Lords stages in July and goes into Commons committee from 20 October 2026. It would make the CAA a direct enforcer of consumer law under the Digital Markets, Competition and Consumers Act 2024, where a penalty can reach "£300,000 or, if higher, 10% of the total value of the turnover". It allows regulations requiring airlines and airports to be members of complaint, dispute resolution or redress schemes. And it requires the Secretary of State, within a year of the Act being passed, to begin consulting on "the compensation that should be paid for breaches of requirements to provide assistance to disabled persons and persons with reduced mobility" and on complaint procedures. The Railways Bill, now in Lords committee, adds Great British Railways to the bodies covered by the public sector equality duty and creates a passenger watchdog with "a specific duty to consider the interests and needs of disabled passengers". Neither bill mentions AI or automation.

The rights that already apply

Air passengers' compensation, care and rerouting rights (UK261) and the rights of disabled air passengers (Regulation 1107/2006) remain in force as assimilated law, as do sea passengers' rights (Regulation 1177/2010), enforced by the MCA. Service providers owe disabled passengers reasonable adjustments under the Equality Act 2010.

CAA, CAP3064G, April 2025 · ORR, *Safe AI Innovation Action Plan 2026*; ORR *digital safety strategy*, 28 September 2026; *Accessible Travel Policy guidance*, October 2025; consultation, 30 June 2026 · Civil Aviation (Consumer Protection and Regulatory Reform) Bill [HL], Bill 132, cl. 1-2 · DMCC Act 2024 s.182(6) · Railways Bill, HL Bill 25 · DfT, *Railways Bill factsheet*, updated 9 October 2026.

The change nobody has framed

The assistance booking is health data, and the law on automated decisions changed in February.

Every assistance booking records something about a person's body or mind: that they use a wheelchair, cannot see, need help with stairs, have a learning disability or a condition that is not visible. That is data concerning health, one of the special categories of personal data. Most operators hold it to deliver assistance, which is lawful and necessary. The question is what happens when an automated system starts using it to decide something.

UK GDPR ARTICLE 22B, IN FORCE 5 FEBRUARY 2026

A significant decision based "entirely or partly" on special category data may not be taken solely by automated means, unless the person gives explicit consent or the law requires or authorises it in the substantial public interest.

The Data (Use and Access) Act 2025 replaced the old Article 22. For most data, solely automated decisions moved from prohibited to permitted, with four safeguards: tell the person, let them make representations, let them obtain human intervention, and let them contest the decision. For special category data, the routes stayed narrow.

Disruption tools are being built to rebook, prioritise and compensate. Some will use the assistance flag, and some should, so that the passenger who needs help is not the last to be rebooked. That is exactly why the question matters. An automated rebooking, prioritisation or redress decision that uses the flag may be a significant decision based partly on health data. If it is, it needs explicit consent or a legal basis an operator cannot create for itself. "Solely automated" means no meaningful human involvement, so a person who signs off without looking does not change the answer.

- The Information Commissioner must prepare a statutory code on AI and automated decision-making (SI 2026/425). Under the Data Protection Act 2018 it will be admissible in evidence, and courts and tribunals must take it into account.
- The Department for Transport's aviation accessibility group is developing a proof of concept for "a new digital platform to support the exchange of more detailed insights into customer access needs". That is health data moving between organisations.
- Rail and aviation regulators already require case-by-case judgement for redress when assistance fails. A data protection basis and a consumer rule point the same way.

This is the question for an operator's data protection officer, not a legal conclusion. The author is not a lawyer.

UK GDPR Articles 22A-22D, as substituted by the Data (Use and Access) Act 2025 s.80 (in force 5 February 2026) · Data Protection Act 2018 (Code of Practice on Artificial Intelligence and Automated Decision-Making) Regulations 2026, SI 2026/425; DPA 2018 ss.125 and 127 · DfT, 2026 Aviation Accessibility Implementation Group Annual Report, 19 October 2026.

Beyond the UK

Europe is automating the claim by law, and asking for the algorithm to be explained.

Two pieces of EU law matter to any UK operator that sells to passengers in the EU or flies from an EU airport. The AI Act's transparency obligations have applied since 2 August 2026. Under Article 50(1), AI systems "intended to interact directly with natural persons" must be designed so that people "are informed that they are interacting with an AI system, unless this is obvious". The revised air passenger rights regulation, Regulation (EU) 2026/2202 of 16 September 2026, applies from 23 October 2027. It keeps the three-hour delay threshold for compensation and pushes airlines towards automating the claim: they "should automatically and electronically provide passengers with information on passengers' right to compensation and clear instructions on how to submit a request", and passengers who choose reimbursement "should be automatically reimbursed, in a timely manner, without an obligation to submit a dedicated request".

NETHERLANDS · ACM, 29 SEPTEMBER 2026

A study of 56 routes, 155,417 flights and over 14 million transactions: "between 30 and 35 unique prices are paid for the same base ticket", and "one in three tickets is priced 40 percent or more above the average price". Personalised pricing is "used to a very limited extent". The risk the regulator names is that "the pricing algorithm does not take into account the consumer's specific circumstances", including those who "must rebook their trip at the last minute due to cancellations". ACM is calling for EU transparency rules.

CANADA · CIVIL RESOLUTION TRIBUNAL, 2024

An airline's chatbot told a bereaved passenger he could claim a reduced fare after travelling. The airline's own policy said otherwise, and it argued the chatbot was "a separate legal entity that is responsible for its own actions". The tribunal called that "a remarkable submission" and found the airline liable for negligent misrepresentation: "It makes no difference whether the information comes from a static page or a chatbot."

THE CONTRAST

The EU now requires airlines to prompt and pay claims automatically, and to tell passengers when they are talking to AI. The UK's equivalent debate is happening in a bill that does not mention automation, and in a consultation on compensation for failed assistance that has not yet begun.

Regulation (EU) 2024/1689, Articles 50 and 113 · Regulation (EU) 2026/2202, OJ L 2 October 2026, recitals 24 and 36, Article 3 · Netherlands Authority for Consumers and Markets, *Summary of the Market investigation into computer-controlled consumer prices in the aviation sector*, 29 September 2026 · *Moffatt v. Air Canada*, 2024 BCCRT 149, paras 27–28.

Today

Seven things an operator can do now, none of which needs new law.

- **Put the assistance booking inside the shared disruption prediction.** So that every automated rebooking, replacement bus, missed connection and gate change, and test any recovery tool for it before it goes live. More than 100 stations are already trialling electronic handover of assistance between boarding and destination stations; that is the foundation.
- **Prompt compensation for passengers who did not claim.** Start with failed assists: about nine in ten passengers who were not fully assisted did not claim. Pre-filled claims already exist for delay in rail; the EU is making them the norm in aviation.
- **Route every claim or complaint involving an assistance booking or a vulnerable passenger to a person.** Case by case, as the rail regulator's guidance already requires for failed assists, and as the CAA's contestability principle expects.
- **Fix the data before training anything on it.** If 106 of 51,691 disputes are recorded under disability rights, the record is not seeing them. In depots, the rail plan says, "work orders are largely free text, fault codes are inconsistently applied".
- **Predict the faults that cause cancellations, and forecast assistance demand for disruption days.** The rail industry says the component data for predictive maintenance already exists. Booked rail assists rose 21 per cent in a year to a record; staffing plans built on averages will fail on exactly the days that matter.
- **Publish how a claim held by the fraud model reaches a person, and how long it takes.** Measure genuine claims held as carefully as fraud stopped.
- **Publish what the cameras do, and write down the Article 22B basis.** Computer vision for trespass, track defects and turnaround is already in use; British Transport Police publishes every facial recognition deployment and its outcome, and an operator's own cameras can meet the same standard. Before any automated decision uses the assistance flag, record the lawful basis and keep the review meaningful rather than ceremonial.

THE COMMON THREAD

Automate the claim. Test the automation against the passenger it is most likely to drop.

None of these steps slows down compensation or recovery for the many. Each one protects the few who, on the evidence, the current system already fails most often when things go wrong.

Drawn from ORR, CAA and DfT publications, the GBRX action plan, UK GDPR Article 22B and Regulation (EU) 2026/2202 · ORR, *Annual rail consumer report 2025 to 2026* (electronic handover trials) · ORR, *Rail passenger assists, rail periods 1 to 4*, 8 October 2026.

Tomorrow

Three levels defined by where accountability sits, and three horizons.

Three levels

Assistive	It drafts or prepares; the passenger or member of staff decides. A pre-filled Delay Repay claim that the passenger can accept, change or reject sits here, as do disruption updates in plain language or British Sign Language. Accountability is unchanged, and almost all defensible value sits here today.
Augmentive	It flags or recommends within bounds; a person confirms or overrides, and the override is recorded. A fraud model that holds a compensation claim for review sits here, as does a recovery plan proposed to a controller. The review has to be shown to overturn the model when it is wrong, and the regulators' requirements for case-by-case redress are the test.
Adaptive	It acts within a defined envelope, and oversight moves to whoever sets and monitors the envelope. Automatic rebooking and automatic reimbursement sit here, and EU law is pushing reimbursement towards it. Where the decision uses the assistance flag, Article 22B limits how it can be done. For passenger transport this is a reasoned projection, not an observation.

Three horizons

0 to 12 months	The Civil Aviation Bill in Commons committee from 20 October 2026. The CAA consults on updating its airport accessibility framework this year. The ORR decides on its redress framework for failed assists. Contactless eGates at every UK airport by early 2027. Scotland's Ferries Accessibility Standard due later in 2026.
12 to 36 months	The EU's revised air passenger rights apply from 23 October 2027. Consultation on compensation for failed assistance in aviation within a year of the Bill becoming law. Great British Railways and a statutory passenger watchdog, with the equality duty applying to GBR.
36 months and beyond	Rebooking, compensation and passenger information driven from one prediction across modes, as the rail industry's plan describes. Whether the assistance booking survives that is the question this briefing raises.

The third band is a projection, not an observation. Both bills are still before Parliament, and the aviation consultation has not begun.

UK Parliament, bill stages as at 19 October 2026 · CAA, CAP3264 · ORR, consultation, 30 June 2026 · Regulation (EU) 2026/2202 · GOV.UK, 6 October 2026 · Scottish Government, *National Islands Plan Annual Report 2025*, 20 March 2026 · GBRX action plan.

Benefit realisation

Faster payment is a real benefit. It is not the whole answer, because it says nothing about the passengers the model held back.

The worked example is on the public record. The rail industry's own AI plan gives machine learning on Delay Repay as a success: it removes fraud from the scheme, "enabling customers to be reimbursed on the same day as submitting a claim". That is a real gain for the many passengers whose claims are simple, and it should be measured.

It is a measure of speed and of fraud stopped. The benefit claimed for any compensation system rests on paying the right people the right amount, and nothing in the published account measures the genuine claims the model held. A benefit case that counts claims paid faster will report success whatever happens to those passengers. The same plan warns that "many AI pilots struggle to produce measurable financial benefit", which is a reason to set the measures before any tool goes live, in the operation as much as at the ticket office.

WHAT OPERATORS ALREADY MEASURE

Claims closed within 20 working days (99.1 per cent in rail). Approval rate (83.6 per cent). Complaints per 100,000 journeys (18.4). Fraud stopped. Time to pay.

WHAT TO MEASURE BESIDE IT

Genuine claims held by the model, and the days until a person saw them. Assistance delivered when the service is disrupted, against the 67 per cent baseline for cancellations. Failed assists compensated. Complaints recorded under the disability category. Disputes where the first answer did not stand.

ONE MEASURE OF THE PEOPLE THE AUTOMATION LEAVES BEHIND

Add it to the benefit case before the tool goes live, not after the first complaint.

The baselines already exist in published statistics. An operator can set its own from the same sources and show, quarter by quarter, that faster compensation for most passengers has not come at the expense of the few.

GBRX, *Artificial Intelligence in Rail: The Industry Action Plan* · ORR, *Delay compensation claims*, 15 October 2026; *Passenger rail service complaints*, 25 June 2026; *Experiences of Passenger Assist 2025-2026*.

A way in

Eight workstreams. The first three form a natural first step.

01	Readiness assessment	Every automated decision that touches a passenger, from compensation and rebooking to chatbots and fraud screening, and who answers for each.	4–6 weeks
02	Use case identification and triage	Sorted by where accountability sits on the three levels, and by whether the assistance flag is used, not by expected saving.	3–4 weeks
03	Regulatory and legal position paper	Article 22B, the ORR and CAA redress requirements, both bills and the EU rules, read together.	3–4 weeks
04	Board and executive governance	What the board sees, and how often, including a measure of who automation leaves behind.	4 weeks
05	Threat and integrity response	Fraud against compensation schemes, handled with a published route for genuine claims the model holds.	4 weeks
06	Benefit realisation framework	Including the measures in section thirteen.	3 weeks, parallel
07	Build, buy or partner evaluation	Including whether a supplier's recovery tool carries the assistance booking, and what its fraud model's false-flag rate is.	4–6 weeks
08	Twelve-month mobilisation roadmap	Sequenced against both bills, the CAA's accessibility consultation and the EU's October 2027 date.	2 weeks

THE FIRST STEP

Workstreams one to three form a natural first engagement of six to eight weeks.

The Civil Aviation Bill is in committee now, and the CAA consults on its accessibility framework this year. Six to eight weeks is enough to show what happens to an assistance booking when an automated tool acts, before a regulator asks.

Sources

Every figure in this briefing, traceable to a named publication and a date.

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- Civil Aviation (Consumer Protection and Regulatory Reform) Bill [HL], Bill 132, as brought from the Lords · Railways Bill, HL Bill 25 · UK Parliament bill stages as at 19 October 2026 · Digital Markets, Competition and Consumers Act 2024 s.182 · UK GDPR Articles 22A–22D (DUAA 2025 s.80) · SI 2026/425 · Equality Act 2010.
- Regulation (EU) 2024/1689, Articles 50 and 113 · Regulation (EU) 2026/2202 of 16 September 2026 · Netherlands Authority for Consumers and Markets, summary of market investigation, 29 September 2026 · *Moffatt v. Air Canada*, 2024 BCCRT 149.

Excluded on the record: an unattributed case study claiming 93% automated claim processing and 70% fraud-detection accuracy for UK train operators; an airline's minutes-of-delay-saved figures and on-time claims given at an industry conference; a supplier's satisfaction and repeat-purchase figures for an airline disruption product; a trade-press account of an airline rebooking tool that prioritises passengers with accessibility needs, for which no airline statement could be found; security-company reports on airline impersonation scams; a survey finding not present in the report it was attributed to; a 2024 report on airport accessibility that surfaced as current; an estimate of the share of rail journeys in public ownership; an industry plan's productivity figure that could not be matched to the regulator's own report; an operator's minutes-of-delay figure for train-borne AI cameras; and supplier announcements on port digitalisation.

About the author

Neil Catton is an independent technology strategist with more than thirty-nine years of technology leadership across twenty-plus sectors, from central government, policing and transport to banking, manufacturing and insurance. He has held CTO and Director-level roles at BT, Wipro, Fujitsu, Sopra Steria and Capita, and works across a fractional portfolio spanning public safety, public sector, insurance, health technology and early-stage startups.

His transport work runs from the passenger record outwards. Early in his career he worked as an Oracle consultant on a new passenger management system for British Midland, and designed and delivered database training for a developer of airline systems. At Capita he worked on technology strategy for the Port of Felixstowe and on a bid for Gatwick Airport. At Sopra Steria he led the architecture for a bid to deliver an intelligent transportation system for London's surface network. He is the author of the technology ethics trilogy *The Next Evolution*, *The Cognitive Crucible* and *The Shadow System*, and writes at neilcatton.substack.com.

How this briefing was produced

Only primary sources are used: a regulator, official statistics, Parliament, a government department, a court, a law-enforcement agency, an operator speaking on its own record, or the statute book. Where this briefing reports an absence, the relevant source was searched for it and the claim is stated as what was searched. Figures that could not be traced to a named source are named as excluded rather than quietly dropped, because what a briefing leaves out is the better test of it.

In keeping with this report's own argument: this briefing was produced with AI assistance, used transparently and kept under direct human editorial control throughout. Every source was verified; every judgement was reviewed by Neil Catton before publication.

NOTICE

This briefing is not legal, regulatory, financial or professional advice. The position is stated as at 20 October 2026 and may since have moved; both bills cited are still before Parliament, and readers should check the current position before relying on anything here. Third-party sources are cited in good faith and should be verified before reliance. Named organisations appear only from their own publications, official statistics, regulator or ADR data, court decisions or law-enforcement statements, and are used illustratively; none has been engaged or approached in connection with this briefing. No advisory or client relationship is created by receipt of this document.

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Version history

Version	Change	Date
v1.0	First publication, including AI across the operation.	20 October 2026