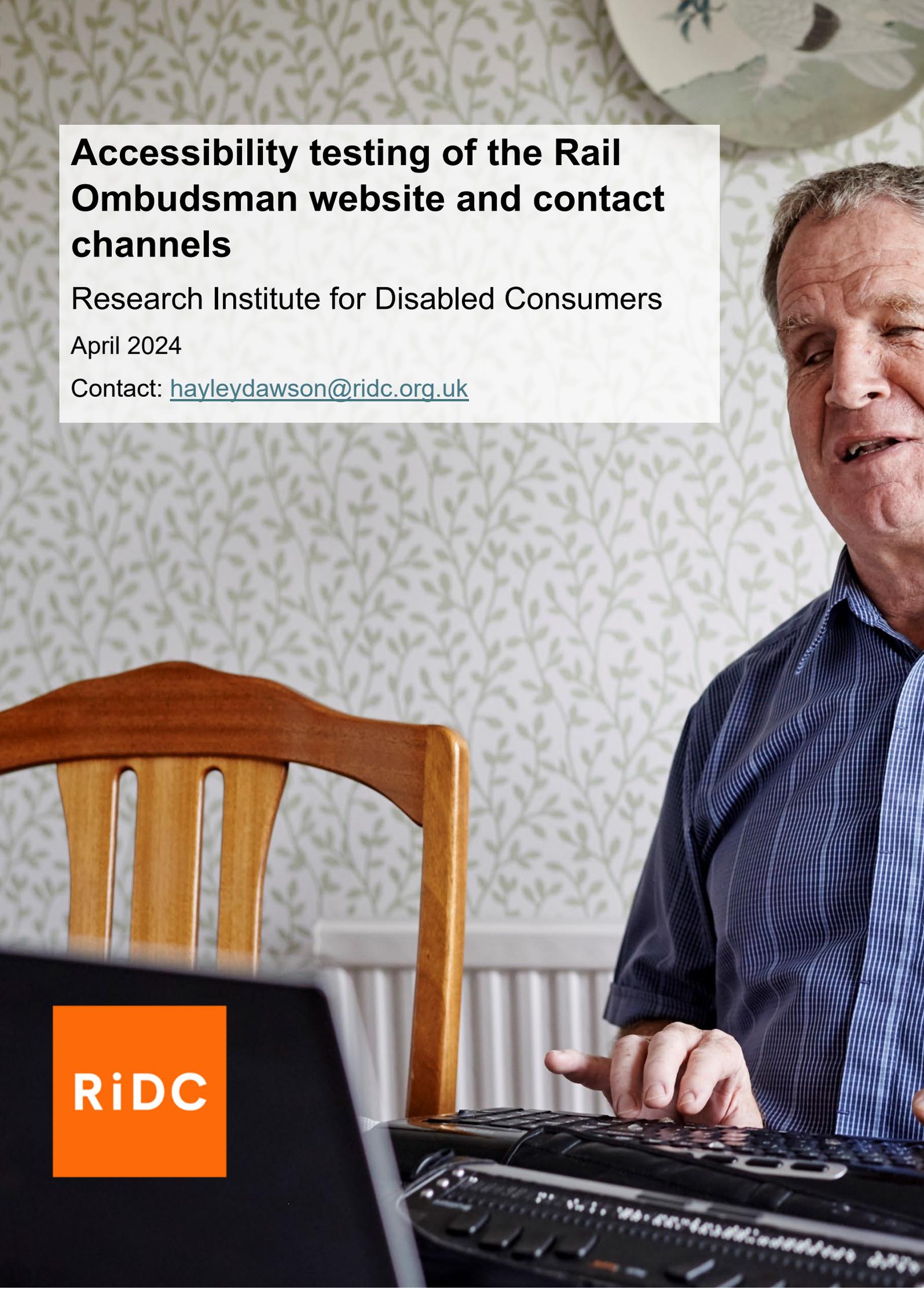


# Accessibility testing of the Rail Ombudsman website and contact channels

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## Introduction

This work was commissioned by the Office of Rail and Road (ORR) who took over sponsorship of the Rail Ombudsman in November 2023. The [Rail Ombudsman](#) is a free, independent service that investigates unresolved complaints between passengers and participating train and station operators (“Operators”).

The purpose of this research was to understand the accessibility of the Rail Ombudsman [website](#) and other communication channels. The focus was to assess whether the service is working well for disabled people, and older people who might have accessibility needs. The project started on Wednesday 10 January 2024 with the fieldwork carried out between Wednesday 28 February and Monday 17 March.

There were three components to the work:

1. Technical assessment: An audit of the Rail Ombudsman digital services (covering both the website, consumer portal and Case Management System) against Web Content Accessibility Guidelines (WCAG) which are internationally recognised standards for improving web accessibility for people with disabilities. The technical assessment was tested to [WCAG 2.2 Level AA](#), which is an intermediate level of accessibility and includes all Level A requirements. References to Accessible Rich Internet Applications (ARIA) in this document detail how assistive technologies convey information within web pages.
2. Web testing: The accessibility of the Rail Ombudsman website was tested by disabled and older people to compliment the technical testing.
3. Mystery shopping: The accessibility of the Rail Ombudsman service was tested by disabled and older people to ensure contact channels, such as email, telephone, SMS (short messaging service), WhatsApp, and the British Sign Language (BSL) interpreter service, are accessible.

Carrying out a technical assessment of the website would only give a partial view of how disabled and older people interact with the website. The web usability testing and mystery shopping components allowed us to test the accessibility of the Rail Ombudsman service through various consumer journeys, which were to assess:

- If disabled and older people can easily access information about the Rail Ombudsman service;
- If disabled and older people can easily raise a complaint with the service;
- If disabled and older people can engage with the complaints handling process; and
- If disabled and older people can easily transfer their case to another body for help.

This research brought together a combination of automated testing and human evaluation, which brings an element of subjectivity among the experiences that participants had. Whilst it is acknowledged that individual user experiences may differ, the value of testing the website and other contact channels by disabled and older people in their home environment is to provide meaningful insight into the real-world accessibility issues that can exist when using the Rail Ombudsman service.

This report details the findings from each component of the research and includes recommendations for best practise to ensure the Rail Ombudsman service is accessible.

## **WCAG 2.2 Level AA technical assessment**

### **Methods**

To assess compliance with the WCAG standards we used SortSite 6, a 'web-crawler' programme that automatically assesses each page of a website against the numerous accessibility criteria specified in the WCAG.

Full scans were undertaken of three Rail Ombudsman sites, including two customer facing sites, as follows:

1. The Rail Ombudsman website (full scan minus the portal): <https://www.railombudsman.org/>
2. The Rail Ombudsman consumer portal where consumers can raise complaints: <https://portal.railombudsman.org/signin>
3. The Rail Ombudsman internal Case Management System (CMS) used by the Rail Ombudsman to register and track complaints: <https://ombudsmancms.com//en/dashboard>

These scans ran from Monday 26 February to Friday 8 March 2024 (using SortSite version 6.51.980.0.) The exact configuration settings used are detailed in Appendix 1 - Full configuration file 'SortSite test setting.sset'. These settings will allow any future audits to be conducted against the same criteria.

What can be helpful in providing insight into the compliance of a website is to see what the impact is when removing the most frequently seen issues (WCAG 2.2 level AA compliance failures).

This shows how much further work is required to bring the website closer to full compliance. If it takes the removal of just four or five of the most frequently seen issues (failures) to improve the percentage of pages with issues from 95% to 7%, then this would suggest the website is already relatively accessible and can further significantly improve its accessibility performance by resolving the four or five issues identified.

Conversely, if it takes 15 or 20 issues to be removed to achieve a similar result (from 95% to 7% of pages with issues), then the website's accessibility could be said to be poor and would need more substantial work to improve its performance.

## **Findings**

The technical assessment identified failures to satisfy the Success Criteria on all three sites tested, the Rail Ombudsman website, portal, and a management system (CMS) and as such do not conform to WCAG. It should be noted that there are exceptions within the success criteria which might be applicable which would need to be reviewed with the web development technical teams. After review, and with any remedial action taken, conformance can be claimed.

The website and portal constitute the customer facing elements of the Rail Ombudsman website and are reported on both separately and together, whilst the CMS is reported on separately from the customer facing elements as it is an internal dashboard for the use of the Rail Ombudsman and not visible to the public.

## **Customer facing sites (Website and Portal)**

Across both customer facing elements (website and portal), 550 pages and files were inspected which identified 12 WCAG 2.2 issues (11 on the website and one on

the portal) these being present on 118 pages. This equated to 21% of pages of the customer facing websites having WCAG 2.2 issues.

A calculation was made to see the impact of resolving six of the most prevalent issues across the website and portal. This would leave nine pages on the customer facing sites with WCAG 2.2 issues, or 2% of pages.

## Website

The five most prevalent WCAG 2.2 accessibility issues for the Rail Ombudsman website were:

1. [WCAG 2.2 A 4.1.2](#)

This success criterion is to ensure that assistive technologies can gather information about, activate (or set) and keep up to date on the status of user interface controls in the content of a web page.

23% of pages on the Rail Ombudsman website failed this success criterion.

This can impact screen reader users who would hear silence when trying to access an element on a web page which should otherwise be informing the screen reader user about that element's function and status. These elements might be a cookie consent button, or a calendar to enter the user's date of birth.

2. [WCAG 2.2 A F39](#)

This relates to the requirement for all non-text content such as images, banners and logos that are presented to the user to have an alternative that serves an equivalent purpose.

This includes decorative banners, headers and images used as blank spaces on web page. These should all be ignored by assistive technologies.

8% of pages on the Rail Ombudsman website have this issue, **potentially affecting how some screen readers (JAWA, NVDA & Voice Over) recognise non-text content.**

3. [WCAG 2.2 A F63](#)

This criterion relates to the need for the purpose of each link to be determined from the link text alone. For example, an article about a topic placed on a

webpage which links to more information, should label the link to indicate the context of the hyperlink i.e., '[Full article about topic](#)'.

2% of pages on the Rail Ombudsman website have this issue with the use of generic "click here" or "read more" labels with embedded links.

**Without any context, users (especially screen reader users) will not know where they are being directed to.**

#### 4. [WCAG 2.2 A F2](#)

This success criterion ensures that important semantic information such as headings or font weights, are not lost on the web page with the use of Cascading Style Sheets (CSS). Cascading Style Sheets are web documents that specify the presentation and styling of web pages such as text sizes and fonts and is used to provide design consistency.

2% of pages on the Rail Ombudsman website have this issue with the use of the bold type on webpages being informed by the CSS, resulting in **the semantic indication of importance not being presented to assistive technologies, i.e., a screen reader will not recognise the bold text.**

#### 5. [WCAG 2.2 AA 1.4.3](#)

This success criterion ensures that the contrast between text and background meets minimum levels dependent on the size and type of text and images of text.

2% of pages on the Rail Ombudsman website have this issue.

**The Rail Ombudsman website has 13 pages with light grey text on a white background, dark grey text on a black background and white text on a red background. Some users will find this hard to read.**

### Portal

There was one issue affecting 7% of the portal (two pages), i.e.,

#### 6. [ARIA 1.2 6.2.4](#)

This refers to an invalid value for the ARIA attribute aria-live (=true) and will **potentially affect the operation of assistive technology during password recovery.**

## Case Management System (CMS)

The technical assessment SortSite scan of the CMS inspected 61 pages and files and identified 13 WCAG 2.2 AA issues being present on two of the four HTML pages used on the CMS.

Although overall, only 3% of pages and files for the CMS have these issues, they all are present across the two pages used for the 'Dashboard' and 'Noscript' HTML elements. This will result in making the CMS unusable for assistive technologies.

Below are the three most prevalent WCAG issues. Because of the high number of WCAG issues (13) across a small number of HTML pages (2), it is not possible to meaningfully prioritise which issue would have the biggest impact.

1. [ARIA 1.2 5.2.8](#)

Headings should not be empty because **screen readers read out page headings** allowing users to quickly skip to a section.

2. [WCAG 2.2 A F65](#)

This describes a failure condition for text alternatives on images. If there is no source of text to provide an alternative for the image, then **assistive technologies are not able to identify the image or to convey its purpose to the user.**

3. [WCAG 2.2 A F89](#)

Failure of this success criteria is due to not providing an accessible name for an image which is the only content in a link. The link name allows screen readers to voice what the link does.

**If there is no link content, or the link content is hidden by CSS, screen readers have nothing to read, so read out the URL instead.**

### The most common kinds of issues identified during the audit

- Supporting Accessible Rich Internet Applications (ARIA), where semantic information about widgets, structures and behaviours are not being correctly coded to support assistive technologies for disabled people.
- Ensuring text and background colours have enough contrast.
- Links on pages with the same text going to different destinations.

- Although there were some instances of 'alt text' either not being applied to images or being applied with the use of computer-generated default text, this issue was in the minority.

A full description of all the issues uncovered whilst running these accessibility checks (as of February/March 2024) are detailed with the error classification, and the WCAG best practice and can be found attached to this report. Further to this there is a description of the most prevalent issues in Appendix 1.

# Web testing

## Methods

The web testing component of this research was carried out to test the accessibility of the Rail Ombudsman website and different methods of submitting a complaint.

### Consumer journeys and reporting

For the web testing component, 21 participants took part and completed the following consumer journeys:

- Consumer journey 1: To locate the Rail Ombudsman website, find the [Quick Start Guide](#), download the document in an accessible format, and read a portion of it.
- Consumer journey 2: To find the [complaint application form](#) on the Rail Ombudsman website and complete the form either via the online portal without pressing “submit claim”, or by downloading the form and completing it electronically without sending the form off via email.

Participants for consumer journey 2 were split into two groups: the first group (11 participants) tested the online portal, and the second group (10 participants) tested the downloadable form.

We shared an online survey distributed via Qualtrics with participants so they could report on the consumer journeys. Survey questions captured data on how easy or difficult they found the task, and any challenges they faced. They were also given a series of ten statements (heuristic questions) and were asked how much they agreed or disagreed with them.

The accessibility heuristics used included ten statements related to accessibility guidelines. These heuristics were formed based on the technical requirements outlined in the Web Content Accessibility Guidelines (WCAG) 2.2, which consists of four main principles:

- Perceivable: Perceivable information and user interface components must be presentable to users in ways they can perceive.
- Operable: Operable user interface components and navigation must be operable.

- Understandable: Understandable information and the operation of the user interface must be understandable.
- Robust: Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

Throughout this section the results from the user testing are presented and direct quotes are used to give context to participants' first-hand experiences. On occasion, square brackets have been used to provide additional context and clarifying information. Quotes have not been amended further to not misquote participants.

## Participants

Participants were recruited across four broad impairment groups: visual, hearing, cognitive, and older people. Some participants have multiple impairments.

<b>Group</b>	<b>No. of participants</b>	<b>Disability</b>
Sight	13	2 x Blind with light perception 1 x Blind with no light perception 5 x Blind with residual vision 2 x Partially sighted 1 x Deafblind 1 x Glasses 1 x Eyesight getting worse
Hearing	7	4 x Hard of hearing 1 x Deafblind 2 x Wears hearing aid
Cognitive	9	3 x Autism spectrum disorder (ASD) 4 x Attention deficit hyperactivity disorder (ADHD) 6 x Mental Health including depression, stress, anxiety, bipolar 2 x Epilepsy 5 x Memory 1 x Cerebral palsy
Older	6	Over 65

Table 1 – Web testing participants

Some participants used assistive technology to complete their tasks and various computers and browsers were used across the testing.

<b>Assistive technology</b>	<b>Computer</b>	<b>Browser</b>
10 x Built-in accessibility features on my computer (e.g. text alteration, zoom or magnification) 6 x Screen reader on my computer (e.g. JAWS, NVDA, or Voiceover for Mac) 6 x Screen magnification software 4 x Browser accessibility features 2 x magnifying glass 1 x Speech input software (e.g. Dragon) 1 x Keyboard navigation 1 x Other ('read aloud feature')	8 x Windows 7 x Apple 3 x Other ('laptop', 'iPad Pro', 'Desktop with Linux Mint OS') 3 x Mobile phone	4 x Microsoft Edge 8 x Safari 2 x Firefox 6 x Google Chrome 1 x Other 'Samsung default browser'

Table 2 – Web testing assistive technology, computer and browser information

## Findings

The findings for the website testing are reviewed firstly in terms of the insights from consumer journey 1, specifically relating to the Quick Start Guide. This is followed by consumer journey 2. Firstly, looking at the downloadable application form (PDF) followed by the online portal.

These insights are supported by quotes from the Research Institute for Disabled Consumer's research panel. The quotes are followed by the participant's disability/impairment group and any assistive technology used to complete the tasks.

### Consumer Journey 1

#### Quick start guide

20 out of 21 participants (95%) were able to complete this task on their own.

#### Locating and downloading

When examining the panel's experiences with the Quick Start Guide, locating the guide within the homepage was most problematic in comparison to downloading the guide.

Whilst all 21 participants were able to download the guide, 9 out of 21 participants (43%) said it was either extremely difficult or somewhat difficult to locate it.

From the qualitative data, we can see that the difficulties centered around assistive technology incompatibility and visibility of the link.

#### Assistive technology incompatibility and visibility of link

**“Using magnification, it just wasn't where I was expecting it to be. It's always best to keep things aligned to the left, especially if they're important links.”** – Visual, Cognitive; screen reader, screen magnification software, speech input & built in accessibility features on computer

**“I am visually impaired. I could not find a link to the Quick Start Guide on the homepage. I only found it by chance after going through the menus at the top of the screen and found a link to click on the 'FAQs and Resources' menu. I feel it is quite hidden. A link needs to be on the main homepage. I feel this would have made a difference for me especially given my visual impairment - it is not easy to have to search**

**for things and I would have missed finding the Quick Start Guide if I had not been specifically asked to find it.”** – Visual, Cognitive; screen magnification software

**“I had to guess a lot - it wasn't clear that it even existed. Following the path to it, every icon makes you think every button is going to be downloading something, rather than take you to another page.”** – Cognitive; browser accessibility features (Beeline Reader plug-in)

**“I could not find it on the homepage. I then had to click search button and quick start and then it came up on the list.”** – Visual; screen magnification software & magnifying glass

**“I had to dig for it. It wasn't immediately obvious on the homepage. I only could find it via the search tool because I knew what page I was looking for.”** – Cognitive; Keyboard navigation, built-in accessibility features on computer & browser accessibility features

#### Reading through

Whilst only 2 participants said they experienced challenges when reading through the Quick Start Guide there were 7 that responded with 'not applicable, I was not able to read the guide' (33%). This can be explained by both assistive technology incompatibility and problems experienced with font size and type.

#### Assistive technology incompatibility

**“Apart from Voiceover freezing, I found the font/text style to be very hard to read due to the strange word formatting. No, I do not have any sight problems as such, it was not an easy read.”** – Getting older; screen reader on computer, built-in accessibility features on computer & browser accessibility features

**“Screen reader was not synced with text of PDF.”** – Cognitive; screen reader on computer & built-in accessibility features on my computer

## Font size and type

**“The font is quite difficult to read, thin point. Had to really zoom in.”** – Cognitive; keyboard navigation, built-in accessibility features on computer & browser accessibility features

**“Font and contrast spidery and difficult to follow with rather too many words to fulfil purpose.”** – Visual; screen magnification software, magnifying glass, built-in accessibility features on computer, browser accessibility features

## Consumer Journey 2

### Downloadable application form (PDF)

9 out of 10 participants (90%) were able to complete these tasks on their own.

### Locating and downloading

All 10 participants confirmed they could download the form and that few problems emerged in terms of navigating to the guide in the first place. 7 out of 10 (70%) confirmed it was either extremely easy or somewhat easy to navigate from the website’s homepage to the PDF form.

There was one response that echoed the problems experienced with the Quick Start Guide. The issue encountered related to the visibility of links. Specifically, in terms of font style, as shown in the insight below.

### Visibility of links

**“Spent a lot of time looking as after clicking complaint it wasn’t clear enough where to download the form. It needed to be in bold or highlighted like the way start complain is highlighted.”** – Visual; screen magnification software & magnifying glass

### Completing the form

4 out of 10 participants (40%) had difficulty completing the downloadable application form (PDF).

The challenges experienced centered around assistive technology incompatibility.

#### Assistive technology incompatibility

**“The text size of my typed answers seemed to vary sometimes depending on how much information I put in a box. E.g. if I put less information in a box the text was bigger, the more information I put the smaller the text I typed displayed. This was difficult for me to work with given my visual impairment and that I was using magnification software.”** – Visual, Cognitive; screen magnification software

**“Form boxes on Adobe did not align with the form boxes on the PDF and screen reader was out of sync with the text on the PDF.”** – Cognitive; screen reader on computer & built-in accessibility features on computer

One participant also commented:

**“The cover page was very text heavy and difficult to read. filling in the actual form was okay (as good as forms can be when you have ADHD and dyslexia).”** – Cognitive; Browser accessibility features (Beeline Reader plug-in)

#### Online portal

10 out of 11 participants were able to complete the task on their own (91%).

#### Locating and filling in the complaint form

7 out of 11 (64%) confirmed it was extremely easy navigating from the homepage to the portal with the rest stating it was neither easy nor difficult (36%).

However, challenges emerged in terms of completing the complaint form through the portal. 8 out of 11 (73%) experienced challenges when filling in the complaint form. Challenges are detailed in the themes below.

#### Submitting form – tick boxes

**“Trying to find the tick box for the declaration.”** – Visual, Getting older; built-in accessibility features on my computer

#### Language and alternative formats

**“The portal is academic laden language as opposed to simple, direct language. There are no portal options for an easy read alternative. Its colours cannot be changed, and its company dominant in this regard - with little thought to adding speech or a reading aloud option. The drop-**

**down scenario used is able centric and ignores dexterity, and visual fields. Its egalitarian, ableist, and lacks the tools to "enable all" - such as recite me which would allow colour changes, reading and numerous languages.”** – Visual, Hearing; screen reader on computer (Dolphin Supernova), screen magnification software & built-in accessibility features on computer

Assistive technology incompatibility

**“I 100% feel that during this form process. JAWS and portal lost communication with each other. I tried using form field navigation and JAWS became very random with what it read out. Very confusing and extremely unhelpful to me as I am totally blind. Sorry I couldn't complete [the] task because I feel I was over 50% through as I know I wouldn't have been uploading anything. If I was making a real complaint, this would have made me very frustrated. And more angry as a customer of Rail Services.”** – Visual; screen reader on computer

## Finding content

The table below provides average scores for consumer journeys 1 and 2, alongside averages for each of the cohorts.

	All	Sight	Cognitive	Hearing	Older
How easy or difficult was it to find the <b>Quick Start Guide</b> from the homepage on the Rail Ombudsman website?	52%	29%	60%	71%	50%
How easy or difficult was it to find your way from the homepage to the downloadable application form ( <b>PDF</b> ) on the Rail Ombudsman website?	70%	50%	75%	88%	75%
How easy or difficult was it to find your way from the homepage to the complaint <b>portal</b> on the Rail Ombudsman website?	82%	83%	75%	75%	100%

Extremely easy

81 to 100%

Somewhat easy

61 to 80%

Neither easy /difficult

41 to 60%

Somewhat difficult

21 to 40%

Extremely difficult

1 to 20%

Table 3 – Web testing results for finding content

## Heuristics

The accessibility heuristics included ten statements related to accessibility guidelines. The heuristics were formed based on the four main principles outlined in the WCAG 2.2 guidelines: (1) perceivable, (2) operable, (3) understandable, and (4) robust.

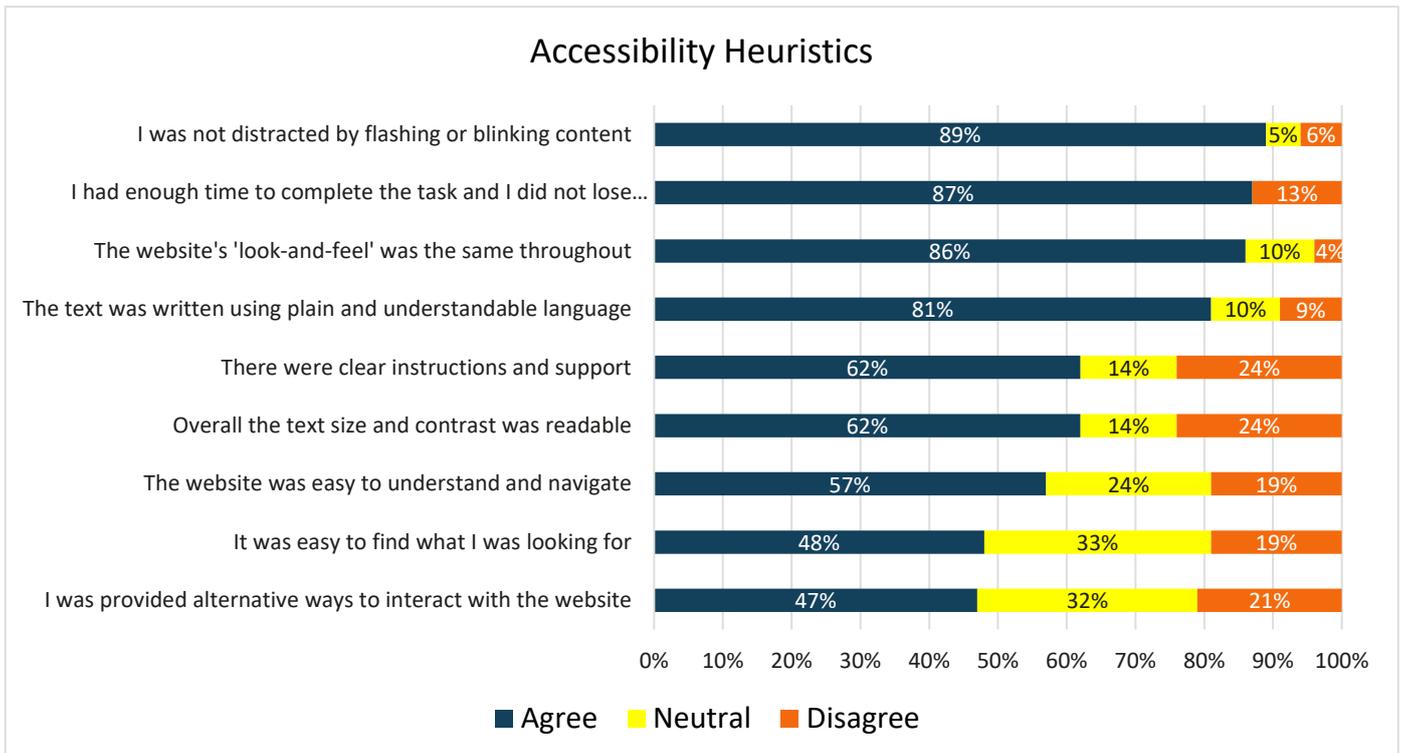


Figure 1 – Web testing results for accessibility heuristics

When looking across all the nine heuristics questions, as presented in the table above, 'I was provided with alternative ways to interact with the website' performed the worst with an agreement score of 47%.

This may reflect the difficulties experienced by the panel members that looked for an easy read option.

The participant's interpretations of 'easy read' may differ, however page 11, subsection 2.2 of the following gov.uk document provides guidance on defining this term. It is stated that:

**“The main purpose of an Easy Read document is to tell people with learning disabilities what they need to know. Easy Read is not a simple translation of**

**existing documents into easier to understand language. Easy Read versions should concentrate on the main points of a document so that people with learning disabilities can understand the main issues and make decisions if necessary.”**

This definition, was accessed through guidance produced by the Department for Health on [Making written information easier to understand for people with learning disabilities](#).

This was shortly followed by ‘It was easy to find what I was looking for’ (48%) and ‘The website was easy to understand and navigate’ (57%).

This could be explained in terms of the difficulties experienced locating the various features of the website, particularly with the Quick Start Guide. It may also reflect the theme running throughout the data of the visibility of links.

As examined above under the consumer journey 1 findings, when searching for the Quick Start Guide, it was mentioned that the link to this document was quite difficult to locate. Participants commented that it may not have been found if they were not aware of a Quick Start Guide.

It was suggested by participants, that having a clear, prominent link within the main homepage could have helped with this. To a lesser extent, this also applied to consumer journey 2 when navigating to the downloadable application form (PDF).

Whilst the location and prominence of the link was most at issue, participants emphasised the important of ensuring important information is in bolded text.

Another explanation could be the ongoing theme of assistive technology incompatibility. The comparatively low score for ‘The website was easy to understand and navigate’ may reflect the challenges experienced navigating the website with the various assistive technologies used, as examined above within the consumer journey 1 and 2 findings.

### [Assistive technology](#)

6 out of 16 participants (38%), experienced compatibility issues with their assistive technology when using the website.

Issues included:

**“Could not cope with the PDF guides/forms. It was fine for the actual website.”** – Cognitive; browser accessibility features (Beeline Reader plug-in)

**“For some reason VoiceOver did not like the first document, did not try on the second as was not sure if it was my setup that was causing the problem, and I found no problems with reading the text normally on the second.”** – Getting older; screen reader on computer, built-in accessibility features on computer & browser accessibility features

**“The boxes and text that would be clearly contrasted on a normal white background were not. It was difficult to see hyperlinked text so difficult to see where I needed to be pressing. The pdf also had contrast issues.”** – Cognitive; keyboard navigation, built-in accessibility features on computer & browser accessibility features

**“Screen reader struggled with alt text on images across the website. Some text on website wasn't altered by my built-in text alteration software.”** – Cognitive; screen reader on computer, built-in accessibility features on computer

**“Sometimes Dolphin Supernova would lag behind or not read item fully.”** – Visual, Hearing; screen reader on computer, screen magnification software, built-in accessibility features on computer

A positive experience was also noted, specifically in relation to consumer journey 1:

When discussing experiences with the Quick Start Guide:

**“Task 1 Download and read quick start guide... I use JAWS screen reader. The website was easy for me to navigate by all methods of links and headings commands. But also, by arrow keys and tabbing about. On first entering the website, I liked how JAWS told me how many links there were. On hearing 30 links, I knew that it was a large website. So, it was important to me at this moment that links and headings commands worked. I also liked that JAWS announced lists were closed or opened. So, I knew to open them for further information. It felt JAWS was in-tune**

**with the website... Navigating through the Quick Start Guide was also easy. I liked the fact that I could use headings to help navigate through sections of the document.”** – Visual; Screen reader on my computer

### **Overall experience**

At the end of the survey, we asked participants: “Overall, was the Rail Ombudsman process accessible to you?” In terms of overall accessibility, 9 out of 21 (43%) participants confirmed that the process they engaged in was “definitely accessible” to them with ten confirming it was accessible “to some extent” (48%).

Overall comments included:

#### Positive feedback

**“I found it fairly straight forward and I liked the way they clearly explained the process. I felt informed.”** – Visual, Hearing; screen magnification software

**“I thought the text was positive, helpful, and made me feel that my complaint would be dealt with fairly.”** – Hearing, Getting older

**“Other than taking a bit of time to find the start guide on the menu the whole process was quick and easy to go through.”** – Visual, Hearing; built-in accessibility features on my computer

**“The quick start guide was much more accessible (text size, line length, spacing, text balance) than the PDF downloadable [complaint] form page.”** – Cognitive; browser accessibility features

When discussing the Quick Start Guide:

**“On the Quick Start guide the email address didn't work on page 3, it said it wasn't valid. I clicked the website address and that was ok. The quick start guide had large sized font and good spacing which I liked, and I thought the front cover and back cover were good. I liked the colour scheme overall.”** – Cognitive; built-in accessibility features on my computer

## Suggestions for improvement

When asked for further comments on their experience with the Rail Ombudsman website, participants put forward suggestions for improvement.

Suggestions for improvement from participants point to making links throughout the website clearer and providing alternative options such as 'easy read' formats. This is specified in relation to key documents such as the Quick Start Guide as well as in the context of an overall review of the website, as highlighted below:

**“Might be helpful to add the PDF complaints form to the resources section of the website and add a link to the quick start guide on the "make a complaint" page.”** – Cognitive; screen reader on computer, built-in accessibility features on computer

When asked if there was anything else they would like to comment on regarding their visit to the Rail Ombudsman website:

**“There should be an easy read option, a disabled persons helpline number (visible and accessible). It would be great to have an inbuilt screen reader such as recite me in the pages.”** – Visual, Hearing; screen reader on my computer, screen magnification software, built-in accessibility features on my computer

When discussing the Quick Start Guide:

**“Maybe sections could be broken up with some more images, as it feels like they were trying to create something like an Easy Read but it's not quite one at the moment. I still don't understand what a Deadlock letter is to be honest. Some of the language I find a bit tricky but I appreciate an Ombudsman is serious and deals with legal issues. There are many different contact methods listed which is great, there's lot of choice.”** – Cognitive; built-in accessibility features on my computer

## Tables

The table below provides average scores for the web testing based on the nine heuristics, alongside averages for each of the cohorts.

	All	PDF	Portal	Sight	Cognitive	Hearing	Older
Overall, the text size and contrast was readable	67%	63%	70%	71%	55%	75%	63%
I was not distracted by flashing or blinking content	91%	97%	85%	100%	100%	75%	94%
The website's 'look-and-feel' was the same throughout	85%	93%	77%	75%	95%	92%	75%
The website was easy to understand and navigate	58%	58%	59%	58%	50%	63%	63%
I had enough time to complete the task and I did not lose information if my session timed out	92%	94%	89%	75%	94%	88%	100%
The text was written using plain and understandable language	81%	78%	84%	88%	70%	83%	81%
It was easy to find what I was looking for	56%	48%	64%	46%	40%	75%	63%
There were clear instructions and support	71%	65%	77%	71%	60%	75%	81%
I was provided alternative ways interact with the website (e.g. alternative formats for documents and content, being able to navigate the website with my keyboard)	58%	60%	56%	60%	50%	63%	58%
Average	73%	73%	74%	71%	68%	76%	75%

Strongly Agree

81 to 100%

Somewhat Agree

61 to 80%

Neither Agree/Disagree

41 to 60%

Somewhat Disagree

21 to 40%

Strongly Disagree

1 to 20%

Table 4 - Web testing scores based on accessibility heuristics

## Mystery shopping

### Methods

The mystery shopping component was conducted to test the Rail Ombudsman main contact channels, including the option that is offered via the Rail Ombudsman website to contact a BSL interpreter.

### Contact channels

For the mystery shopping component, 20 participants took part and were split into several groups to test the following contact channels:

- Email (4 participants)
- Telephone (5 participants)
- SMS (4 participants)
- WhatsApp (5 participants)
- BSL interpreter service (2 participants)

The Rail Ombudsman currently also offers a textphone number for users who are deaf or hard of hearing. Testing the textphone contact channel was included in the research design, however, no participants who expressed an interest in the project indicated having a textphone. However, one participant who tested the BSL interpreter service reported on using a textphone when completing one of their journeys – this has been reported on in the BSL section of this report.

The [contact form](#), a short form on the Contact Us page of the Rail Ombudsman website which when submitted reaches the Rail Ombudsman via email, was not tested due to the risk of diluting the research findings across too many contact channels.

### Consumer journeys and reporting

Participants completed the following consumer journeys:

- Consumer journey 1: To contact the Rail Ombudsman via one contact channel, request the Quick Start Guide, receive the document, and read/listen to it to see if it's accessible.
- Consumer journey 2: To contact the Rail Ombudsman via one contact channel and raise a complaint.

- Consumer journey 3: To engage with the Rail Ombudsman via the contact channel or the online portal (given to the participant and as used in previous journeys) as they manage the complaint e.g. receiving information, submitting information they request, and tracking the progress of their case.
- Consumer journey 4: If the nature of the complaint is out-of-scope for the Rail Ombudsman, the consumer receives a notification that their complaint has been transferred to another body that can help (via the relevant contact channel). Not everyone had to complete this task. A participating train company and a transport body were notified during this stage of any complaints that had been raised so as to not escalate them.

Further details on the consumer journeys for each contact channel are available in Appendix 2.

The Rail Ombudsman process ensures that a consumer can raise a complaint when their complaint is deadlocked (which means that the service provider cannot take the complaint any further) or where the complaint has not been resolved within 40 working days of the train or station operator first receiving it.

Not all complaints are in-scope for the Rail Ombudsman service. For any out-of-scope complaints, the Rail Ombudsman seeks to transfer the case to another passenger watchdog who can help (i.e. Transport Focus or London TravelWatch) or, depending on the nature of the complaint, signpost the complainant to another organisation that could help.

To fully engage in the mystery shopping component, RiDC provided each participant with a complaint scenario. 15 of the 20 scenarios were designed as in-scope complaints, where more than 40 working days had elapsed since the complaint was first raised with the train or station operator. Five additional scenarios were designed as out-of-scope complaints. Participants were provided with either an 8-week letter (9 participants) or deadlock letter (9 participants) to submit alongside their complaint. Two participants were not given evidence to submit with their complaint.

We shared an online survey distributed via Qualtrics with participants so they could report on the consumer journeys. Survey questions captured data on how easy or difficult they found completing each journey, submitting evidence, checking complaint

progress, along with any challenges they faced, and satisfaction with their communication with the Rail Ombudsman.

Throughout this section the results from the mystery shopping are presented and direct quotes are used to give context to participants' first-hand experiences. On occasion, square brackets have been used to provide additional context and clarifying information. Quotes have not been amended further to not misquote participants.

## Participant recruitment

Participants were recruited across four broad impairment groups: visual, hearing, cognitive, and older people. Some participants have multiple impairments.

<b>Group</b>	<b>No. of participants</b>	<b>Disability</b>
Visual	11	2 x Blind with light perception 2 x Blind with no light perception 1 x Blind with residual vision 5 x Partially sighted 1 x Eyesight is getting worse
Hearing	9	3 x Deaf 4 x Hard of hearing 2 x Hearing is getting worse
Cognitive	9	7 x Memory 3 x Dyslexia 2 x Mental Health including depression, stress, anxiety, bipolar 1 x Autism 1 x Attention deficit hyperactivity Disorder(ADHD) 1 x Epilepsy
Older	8	Over 65

Table 5 – Mystery shopping participants

Some participants used assistive technology to complete their tasks and various computers, phones and browsers were used across the testing.

<b>Assistive technology</b>	<b>Computer / Phone</b>	<b>Browser</b>
3 x Screen reader 2 x Screen magnification software 2 x Speech input 2 x Voice over on iPhone 1 x Keyboard navigation 3 x Built-in accessibility features on computer: Invert colours, Zoom, Sensibility tools, large pointer	9 x Windows 8 x Apple 1 x 'Other' (iPad)  10 x Apple smart phone 4 x Android smart phone 2 x BSL interpreter service 1 x Landline	2 x Microsoft Edge 6 x Safari 1 x Firefox 7 x Google Chrome 1 x 'Other': 'Duck Duck Go' (an independent alternative to Google)

Table 6 – Mystery shopping assistive technology, computer and browser information

## Findings

### Task 1

For Task 1, participants were asked to access the Rail Ombudsman website and find either the email, telephone, SMS, WhatsApp or BSL contact channel. They were then asked to contact the Rail Ombudsman service via one of the five channels and request to receive their Quick Start Guide, and then read through it.

4 participants were instructed to request an accessible format of the Quick Start Guide. The Rail Ombudsman currently provides 4 accessible formats: Braille, easy-read, large print, and audio. Each format was assigned to one of the 4 participants to request. However, 2 additional participants requested an accessible format independently, resulting in a total of 6 participants having assessed the accessible Quick Start Guides (2 asked for the easy-read format, 2 for the audio format, 1 for the Braille format and 1 for the large print format).

This section provides a detailed account of participants' experiences with each of the five contact channels, highlighting the challenges they faced with various aspects of

contacting the Rail Ombudsman and accessing the Quick Start Guide. The following insights emerged:

1. 5 participants experienced difficulties in finding the relevant contact information. 5 participants also experienced difficulties with contacting the Rail Ombudsman.
2. Of the 18 total participants who received their Quick Start Guide:
  - a. 5 participants experienced challenges when accessing, downloading or opening their Quick Start Guide.
  - b. 10 participants experienced challenges when reading/listening to the Quick Start Guide.
3. Participants using BSL highlighted barriers with contacting the Rail Ombudsman, reporting that the BSL service struggled to get a telephone connection with the Rail Ombudsman team.
4. With the exception of the audio format of the Quick Start Guide, most accessible formats took an extended period of time to be sent to participants. The Braille format took two weeks for the participant to receive it, while the large print format took over a week. On the other hand, most standard formats were received within the day of request.
5. The format of the Quick Start Guide presented accessibility challenges for some participants and their assistive technology.
6. The language used in the Quick Start Guide was labelled as 'vague' and 'unclear', with some participants suggesting it could have been simplified.

The rest of this section will highlight the findings for each contact channel for Task 1.

### *Email*

5 participants contacted the Rail Ombudsman via email to receive the Quick Start Guide. 3 of the 5 participants requested the regular version of the Quick Start Guide, while 1 participant requested the Braille version, and 1 other participant requested the large print version.

Most participants said it was easy to find the email contact information, with only one participant reporting that it was neither easy nor difficult. This participant highlighted having difficulties with navigating the website:

**"The site seemed to enjoy sending me round in circles. Often returning me to previous section or needing to start from scratch. But I got to it after a few tries."** - Hearing, Cognitive; screen magnification

Another participant reported having to use the 'Help' document provided to them in their instruction sheet to understand that they could click on the 'Contact Us' tab on the website to find the email contact address.

When it came to contacting the Rail Ombudsman to receive the Quick Start Guide, 1 participant reported finding it extremely difficult. This was the participant who requested the large print version of the Quick Start Guide and who reported being dissatisfied with the fact that they had to wait over a week to receive the Quick Start Guide. None of the other four participants reported any difficulties, however, the participant who requested the Braille format reported receiving it two weeks after requesting it.

Four participants reported having challenges when accessing or reading the Quick Start Guide. One participant explained having difficulties with their software in downloading the Quick Start Guide, as well as finding the language used in the Quick Start Guide to be 'vague' and 'misleading':

**"Mostly challenges opening the document, as not all my document software would download it in the way I wanted it. In honesty and fairness that could be partly my software and my experience working with it [...] But some of the language used and comments were a little vague or could be a little misleading."** - Hearing, Cognitive; screen magnification

The second participant highlighted how the format of the Quick Start Guide made it difficult to read and lacked certain accessibility features, saying:

**"Found it difficult to read because it's a long white paper. Would be great if it had a choice of making it different colour, also struggled in how it was laid out as original leaflet had to try and find out how to make**

**it bigger. I like a normal page size."** - Visual, Hearing, Cognitive; screen reader, speech input software, Apple sensibility tools

The participant who requested the large print format explained that the Quick Start Guide they were sent was in a small font, and that they had to use their computer magnification in order to be able to read it:

**"Unfortunately, it was not actually in Large Print, I had to increase the font of the document on my computer. I thought it would be sent in large print without the recipient having to change the document on the computer."** - Visual, Haring, Getting older

The participant who requested the Braille format did not experience any major issues when reading the Quick Start Guide, however, they highlighted that the Rail Ombudsman did not ask them whether they wanted Braille grade 1 or 2:

**"The quick start guide was in braille grade 2. That was fine for me but I think they should have asked me if I wanted the guide in braille grade 1 or grade 2 when they asked for my postal address as not all braille users read grade 2 braille."** - Visual; screen reader, keyboard navigation

## Telephone

4 participants contacted the Rail Ombudsman via telephone to receive the standard version of the Quick Start Guide.

Most participants said it was easy to find the telephone contact information, with only one participant reporting that it was neither easy nor difficult.

In addition, all participants reported that it was easy to contact the Rail Ombudsman via telephone to receive the Quick Start Guide. Participants described having received the Quick Start Guide fairly quickly via email, within 5 to 30 minutes upon request, highlighting the Rail Ombudsman ability to efficiently carry out tasks across channels.

When it came to accessing and reading the Quick Start Guide, 2 participants experienced difficulties. Both participants faced compatibility barriers with their voiceover assistive technology, explaining that it was hard to navigate the document:

**"The actual document wasn't entirely inaccessible but the voice reader just kept jumping around throughout the document (it sometimes would take me to the bottom of the document). But in terms of the language, I felt it was easy to understand."** - Visual; voiceover on iPhone

**"It was quite long and extensive, so I did not listen to it all in one go. I was using voice over - and I found it quite difficult to navigate."** - Visual, Hearing, Getting older; screen reader

It was also highlighted that the PDF version of the Quick Start Guide presented accessibility issues:

**"I was able to read most of it, but it was a PDF document, and it would have been more accessible if it had been a web page or a Word document."** - Visual; voiceover on iPhone

### *SMS*

4 participants contacted the Rail Ombudsman via SMS to receive the Quick Start Guide, with 1 participant having requested the audio format.

Only 1 participant reported that it was easy to find the SMS contact information on the Rail Ombudsman website, with 1 participant saying it was neither easy nor difficult, and the remaining 2 saying that they found it difficult. One participant felt that the contact number was not immediately apparent on the website. The other participant seemed to be confused by the term SMS and how it applied to their iPhone, which may indicate a lack of understanding towards SMS in general rather than a failing on the Rail Ombudsman's side.

4 participants contacted the Rail Ombudsman via SMS to receive the Quick Start Guide, with 1 participant having requested the audio format.

None of the participants reported having any difficulties with contacting the Rail Ombudsman via SMS, with most having received the Quick Start Guide fairly quickly upon request. The participant who asked for the audio format received a response within 10 minutes, followed by the audio Quick Start Guide the next day:

**"They replied to my request in about 10 minutes asking me where I would like it sent. I requested via text message. They've acknowledged**

**my request and I received a text message letting me know the audio guide would come from another number. This was the following day. Around 24 hours later."** - Visual; Voice over screen reader on iPhone

2 participants experienced difficulties with accessing and reading the Quick Start Guide. The participant who accessed the audio format explained having challenges with their phone, however, the participant was aware that this may have been an issue with their device and not with the audio format itself:

**"This might be a problem with my phone. However, my phone locked itself automatically when I started listening to the Guide which meant I kept having to swipe on the page to keep it playing all the way through."**  
- Visual; voice over screen reader on iPhone

The other participant stated that it was difficult to read the Quick Start Guide, particularly with their cognitive impairment. The participant printed the Quick Start Guide out to overcome the barriers with the size of the document, but still faced challenges with the printout:

**"As I was using a smart phone it was a bit too small to read and too cramped and due to my functional neurological disorder, I found it easier to print off the document to read. I have an easier time reading things on print/page.**

**I found it too simplified. By that I mean it's long winded and can be amended. Then the important stuff "what next" is more cramped. The blue box with telephone numbers looks very nice in a glossy folder but when printing off it's harder to read. A simple blue frame would be better."** - Cognitive, Getting older

### *WhatsApp*

5 participants contacted the Rail Ombudsman via WhatsApp to receive the Quick Start Guide, with 1 participant having requested the audio format and 2 other participants having requested the easy-read format.

Only 1 participant said it was easy to find the WhatsApp contact information on the Rail Ombudsman website, while 2 participants said it was neither easy nor difficult,

and 2 participants reported having a difficult experience. One participant pointed to an error on the Rail Ombudsman website, highlighting how the WhatsApp contact number at the bottom of the homepage is not the same one as the one on the 'Contact Us' page:

**“At the bottom of the website where it says contacts it says 'Textphone/ WhatsApp' and the number '0330 094 0363' but when I put this in my phone it said it wasn't on WhatsApp. Then found the contacts tab and it had a WhatsApp number that was the right one.”**

We checked and verified, and for reference, the correct WhatsApp number as provided in the 'Contact Us' page is 07427 580 060 which contradicts the number given on the homepage.

Another participant struggled with navigating the website saying that it “wasn't straight forward”, and needed assistance to understand where on the website they could find the contact information they needed.

3 participants found it easy to contact the Rail Ombudsman via WhatsApp to receive the Quick Start Guide, while 2 participants reported having difficulties. One of the participants, who requested the easy-read version, explained that they were confused when the Rail Ombudsman asked them to confirm how they wanted to receive the Quick Start Guide, as they assumed they would send it via WhatsApp. The second participant, who requested the standard version, reported that it took over 24 hours to receive the Quick Start Guide, however it remains unclear as to what time of day the participant made the request.

The second participant who requested the easy-read version did not report having any difficulties, as neither did the participant who requested the audio format, who reported receiving it within a couple of hours.

When asked about accessing and reading the Quick Start Guide, the 2 participants who requested the easy-read version were unable to answer as they had not received them at the time of the research fieldwork being concluded or ahead of writing up the research findings. Both participants requested their easy-read Quick Start Guide on the 12<sup>th</sup> of March and by the end of April they had still not been received.

Of the 3 participants who did receive their Quick Start Guides, 1 participant reported facing challenges with accessing and reading it, particularly with downloading the document:

**“I found it difficult, accessing the correct method to download the document was very confusing, because such activities (i.e. downloading) confused me. I required support in order to fulfil this task as I was unable to do it independently.”**

The participant also explained that they were confused when reading the section of the Quick Start Guide that outlined the different accessible formats, thinking that each bullet point was a hyperlink to the accessible format. The participant attempted to click on the easy-read format, but soon realised that it was not a hyperlink.

### *BSL*

The Rail Ombudsman offers a BSL interpreter service via the website. 2 participants contacted the Rail Ombudsman via BSL to receive the standard version of the Quick Start Guide.

1 participant said that it was difficult to find the BSL contact information on the Rail Ombudsman website, citing that although they knew to look within the ‘Contact Us’ page, many deaf people may not know how to do this, nor be aware that the Rail Ombudsman provide this service. Clearer signposting would be needed to help address this:

**“I knew to look on the website in the 'Contact Us' page for BSL interpreter contact information. Many deaf people may not think to do this, or even know that the Rail Ombudsman is BSL accessible.” -  
Hearing**

Both participants reported having a difficult experience with contacting the Rail Ombudsman via BSL to receive the Quick Start Guide, both describing how the BSL interpreter service struggled to get a telephone connection with the Rail Ombudsman:

**"I tried phoning them three times, via three different BSL interpreters. All of them reported the same problem; the line would ring out a few times**

**and then disconnect immediately. It just wasn't possible to reach them! The interpreters logged this problem, and said that the phone number they had for the Rail Ombudsman was correct. They're unsure why this happens."** - Hearing; speech input software

**"The interpreter couldn't get a telephone connection with the ombudsman at first and the two calls she made kept disconnecting. On the third try she was successful. But then there were 4 options and neither of us were quite sure what we wanted. Finally got through to a real person to talk to."** - Hearing

Both participants ended up having to go on the Rail Ombudsman website and find the Quick Start Guide themselves. Neither participant reported facing challenges with downloading it, although both highlighted their difficulties with reading it. Both participants explained the importance of having the Quick Start Guide easily available in BSL and other accessible formats for people with hearing impairments:

**"It's ok overall but I do find it a bit wordy and hard to take in all the information. It could be written in a way that is simpler or with less words, and/or laid out in bullet points across fewer pages [...] Also, the guide isn't actually available in BSL? There could be a video version available, but a summary so that it's a short video i.e.; 1-2min."** - Hearing; speech input software

**"No BSL version of the QSG. It might help to offer an 'easy read' version alongside the main version. I have to state that because I went deaf when I was a small child, English is my first language. Therefore my experience of doing this mystery shop isn't the same as that of a born-deaf person who has English as their SECOND language and BSL as their first language. They wouldn't find the guide at all accessible without a BSL version."** - Hearing

## Task 2

For Task 2, participants were asked to contact the Rail Ombudsman either via email, telephone, SMS, WhatsApp or BSL requesting to make a complaint, and then submitting a complaint either through the online portal, the downloadable application form (PDF) or by telephone.

To submit a complaint, 10 participants used the online portal, 6 participants used the downloadable application form (PDF) and 4 participants used the telephone.

This section provides a detailed account of participants' experiences with each of the five contact channels and submitting a complaint. The following insights emerged:

1. 3 participants had difficulties with contacting the Rail Ombudsman requesting to make a complaint.
2. Of the 10 participants who used the online portal, none faced difficulties in finding the portal, but 6 participants faced challenges when submitting their complaint.
3. Of the 6 participants who used the downloadable application form, 3 participants found it difficult to find the form, 1 experienced challenges with opening and downloading the form, 2 experienced challenges with completing the form, and 1 experienced challenges in sending the form to the Rail Ombudsman.
4. Of the 4 participants who used the telephone to make their complaint, none faced difficulties in submitting their complaint.
5. Although most participants used the online portal, those who used the telephone and downloadable application form (PDF) highlighted the usefulness of these two methods.
6. The downloadable application form (PDF) was difficult to find on the Rail Ombudsman website as its signposting was not visible and clear enough.
7. Both the online portal and the downloadable application form presented accessibility challenges for participants and their assistive technology.

## *Email*

4 participants contacted the Rail Ombudsman via email requesting to make a complaint. 3 participants submitted a complaint via the online portal, while 1 participant submitted their complaint via the downloadable application form (PDF).

None of the participants reported facing difficulties with contacting the Rail Ombudsman, with only 1 participant having said that it was neither easy nor difficult while the other 3 found it easy.

For those using the online portal, 2 participants said it was easy to find the online portal while the third participant said it was neither easy nor difficult. The fourth participant who used the downloadable application form (PDF) also had an easy experience with finding the complaint form.

Out of the 3 participants who submitted their complaint via the online portal, 2 participants experienced difficulties, highlighting the compatibility barriers faced when using assistive technology:

**"For the question, 'Please state the nature of the remedy that you require'. The check boxes, especially the first one in this selection, isn't linked properly to the answer so difficult to tell which check box goes with which option when using screen reading software." - Visual; screen reader, keyboard navigation**

The participant also went on to describe how certain headings would have been better placed elsewhere, for instance:

**"When in the online portal, the heading 1 for the current page title would be better placed after rather than before the links that say: 'About you: Step 1 of 4, Completed. What happened: Step 2 of 4, Current. Supporting documents: Step 3 of 4, Incomplete. Declaration: Step 4 of 4, Incomplete.' It would make it easier to jump straight to the section of the form that I need to fill out rather than having to down arrow past the above links every time I move onto a new page of the online form." - Visual; screen reader, keyboard navigation**

On the other hand, the participant who submitted their complaint via the downloadable application form reported finding the process easy.

## *Telephone*

5 participants contacted the Rail Ombudsman via telephone requesting to make a complaint. 4 participants submitted their complaint via telephone call, while 1 participant submitted their complaint via the downloadable application form (PDF).

None of the participants reported facing difficulties with contacting the Rail Ombudsman by phone, with only 1 participant having said it was neither easy nor difficult while the other 4 found it easy. However, one participant did explain that it took two separate attempts to get hold of the Rail Ombudsman and that they were not able to submit their complaint on the day they called:

**"I spent a long time waiting on hold on Wednesday and gave up, and then I rang back Thursday. On Thursday the process was straightforward, although I had to be insistent that I want to do a phone complaint. The initial response was this was not a service they offered, but then clarified that they could offer it as a reasonable adjustment. [So I told them that I'm blind] and asked for it as a reasonable adjustment. They then gave me an appointment for 10am today. They were prompt in ringing."** - Visual, Hearing, Getting older; Screen reader

For those who submitted their complaint by telephone, all 4 participants reported finding it easy. The 5<sup>th</sup> participant who submitted their complaint via the downloadable application form (PDF) also reported having no difficulties with finding the complaint form and the overall downloading, completing and submitting process. The process was labelled as 'straightforward' and having gone 'smoothly', with one participant saying:

**"Although they tried to ask me to make my complaint in another way, as soon as I said I was blind she agreed to take a telephone complaint. This went smoothly. I would have been irritated if I had to spend the 15 to 20 minutes listening on the phone to the data protection but she sent it by email. All in all - it was a straightforward process."** - Visual, Hearing, Getting older; Screen reader

One participant highlighted the importance of allowing people to submit complaints via the telephone, explaining the challenges they face with dyslexia, while another

participant reflected on whether the downloadable application form (PDF) or the online portal would have been accessible to them:

**"Because I'm dyslexic, I find it very difficult put words in writing." -**

Visual, Hearing, Cognitive; screen reader, speech input software, Apple sensibility tools

**"The pdf document probably would not have been suitable for me, but I might have liked to use the online portal (but I didn't check it's accessibility with my voice over)." - Visual; voiceover on iPhone**

### *SMS*

4 participants contacted the Rail Ombudsman via SMS requesting to make a complaint. All 4 participants submitted their complaint via the online portal.

Participants described choosing to use the online portal because they felt it was the easiest and quickest method:

**"It seemed the obvious way for me to do so, much less faff than downloading, completing and submitting a form." - Hearing, Getting older**

**"It was easiest for me. Quick and very easy to save and return as I do things in short bursts." - Visual, Hearing, Cognitive**

Most participants had an easy experience with finding the online portal, with one participant saying it was neither easy nor difficult. However, most participants faced challenges when submitting their complaint, with only 1 participant saying that they did not face any challenges.

One participant highlighted that they had to create an account on the online portal, alluding to that they may have preferred an option to use the portal without creating an account. Another participant struggled with one of the questions on the portal:

**"It was mostly accessible. There was only one question that I couldn't answer. The one regarding which remedy I would like. It was just a tick box and no Rail Ombudsman down menu to select an explanation or apology. VoiceOver couldn't interact with the random tick box." - Visual; Voice over screen reader on iPhone**

The third participant who highlighted a challenge said that they had not realised that their complaint had not gone through. It was only after contacting the RiDC research team that the participant realised that their complaint had not been submitted on the portal:

**Your final direction stated attach documents and submit. I unintentionally missed going further so assumed by completing it was finished. Therefore the document didn't go off.** - Cognitive, Getting older

### *WhatsApp*

5 participants contacted the Rail Ombudsman via WhatsApp requesting to make a complaint. 1 participant submitted their complaint via the online portal, while the other 4 participants submitted their complaint via the downloadable Application form (PDF).

3 participants had an easy experience with contacting the Rail Ombudsman and 1 participant said it was neither easy nor difficult. The fifth participant reported a difficulty, finding the Ombudsman's written communications to be confusing:

**"Was a little confusing a response [...] Very wordy. Didn't give me options of how to complete form just the online portal so had to ask for downloadable pdf."** - Visual, Cognitive

Participants also provided several reasons for selecting their complaint method, with 2 participants having chosen the downloadable application form (PDF). One reason for this was due to issues with making an account, which 'might' have been related to a Portal success criteria failure namely ARIA 1.2 6.2.4, which indicates a possible affect during password recovery (although further investigation would need to be carried out to confirm this). Another reason was a participant not wanting to make an account on the portal:

**"I first tried to use the Online Portal and tried to create an account but it kept saying that my email was incorrect. After a few failed attempts, I gave up on the portal and used the downloadable application form. I required support in order to be able to find the form."** - Getting older

**“I didn’t want to create an account.”** - Visual, Cognitive; screen magnification, large pointer

Another participant explained that they chose to use the downloadable application form (PDF) so they would not feel rushed by a possible timeout restriction or stressed about whether their answers would autosave or not. On the other hand, the participant who chose to use the online portal felt that it was easier, and mentioned not liking to download documents:

**“I felt that this would be easier for me as I could save it as I went along. I don’t like downloading things as they have a habit of disappearing.”** - Memory

The participant who submitted their complaint through the online portal also reported that it was easy to find the portal on the Ombudsman website, which contrasted with the 4 participants who used the downloadable application form (PDF), 3 of whom reported having difficulties with finding the form. The participants highlighted that the signposting for the form was not evident and could have been made clearer:

**“I couldn’t work out where to find it, I had to have support. The text where you can find the downloadable form was hard to spot. It should say clearly and in big font, “click here to download form”, and this should be right at the top at the centre of the page. It should be obvious.”** - Getting older

**“The only visible option was to complete online. I couldn’t easily find the downloadable application form. I had to click from ‘Help’ document to directly lead me to correct place.”** - Visual; invert colours, Zoom

When it came to submitting their complaint, 4 of the 5 participants reported facing challenges. 2 participants had difficulties with the format of the downloadable application form (PDF), finding that there was not enough space in-between text:

**“The questions are not formatted with more space. Very close together. Confusing when having to zoom in and out.”** - Visual; invert colours, Zoom

**“Opened in word and hard to input text without it not being in the text boxes/ being half out of the text box and so become unreadable.”** - Visual, Cognitive

1 participant explained that they had difficulty with downloading the form and attaching it to their email, and that they needed support in order to accomplish the task. Another participant reported being confused with the tick boxes at the end of the portal and unknowingly submitting the complaint when they thought they were saving and exiting it:

**“There was only one and that was right at the end on the declaration sheet. I was only putting one tick but it kept saying that I had to tick all the boxes. In the end I decided to save and exit put when I did this the complaint was actually submitted without them being ticked. So why bother it just makes me very anxious as I do not like filling in forms so the easier they make them the better.”** - Cognitive

### *BSL*

2 participants contacted the Rail Ombudsman via the BSL service requesting to make a complaint. Like their experience in completing Task 1, one participant was unable to get through to an Ombudsman staff member via BSL as the BSL service provider was not able to get contact with the Rail Ombudsman. However, the other participant was able to get through.

Both participants used the online portal to submit their complaint, explaining that they felt it would be easier to use:

**“It seemed easier and quicker to enter it directly into the portal.”** - Hearing; speech input software

**“Because it was quicker than any of the other methods.”** - Hearing

The 2 participants said that it was easy to find the online portal on the Rail Ombudsman website. 1 participant did not report having any difficulties with submitting their complaint through the online portal, however, the other participant did highlight that the application form was ‘extremely wordy’ and that it might be a barrier for BSL users who are less proficient in English:

**“Although I didn’t experience any technical difficulties, I do find the application form to be extremely wordy. It takes a lot of time to process the information and understand it. It would be an additional barrier for**

**BSL users who are less confident with English, and would put them off completing it. Some of the words used in the application form were not totally clear to me as well. It could be in much plainer English, and separated out into smaller steps."** - Hearing; speech input software

### Task 3

For Task 3, participants were asked to engage with the Rail Ombudsman complaint process. This involved two different aspects:

1. 5 participants were asked not to provide any evidence when submitting their complaint in Task 2, with the purpose of engaging with the complaint process if the Rail Ombudsman contacted them asking for evidence;
2. All participants were asked to check on the progress of their complaint, either by accessing the online portal, or contacting the Ombudsman directly through one of the five contact channels.

This section provides a detailed account of participants' experiences with getting an update on the progress of their complaint and receiving any further communications or requests from the Rail Ombudsman. The following themes emerged:

1. 6 participants used the online portal to check on the progress of their complaint, while the other 14 used one of the contact channels.
  - a. A total of 6 participants across portal and contact channel users experienced difficulties with checking on the progress of their complaint.
  - b. Of the 14 who used the contact channels to check on the progress of their complaint, 5 participants were dissatisfied with the communications from the Rail Ombudsman.
2. Some participants felt that when checking on the progress of their complaint, the Rail Ombudsman did not provide clear information, particularly concerning its complaint handling timescales.
3. Some participants found the process of navigating the online portal to check on the progress of the complaint to be confusing and not intuitive.
4. Although most participants found it easy to contact the Rail Ombudsman, the SMS and BSL channels were not always a reliable method of contact.

### *Email*

2 participants were contacted by the Rail Ombudsman via email with an evidence request. 1 participant reported a challenge with the Ombudsman's communications and process of submitting evidence, saying that the wording of the Ombudsman's message was 'vague' and 'not as clear as it perhaps could be.' However, it is important to note that according to the Rail Ombudsman's records, they didn't receive a complaint from this participant. Therefore, it remains unclear as to what email communication the participant is referring to. The other participant was neither satisfied nor dissatisfied with the Ombudsman's communications but did not report any specific challenges.

Of the 4 participants who were testing the email contact channel, 2 of them checked on the progress of their complaint by contacting the Rail Ombudsman via email, and the 2 other participants used the online portal. Overall, 2 participants experienced challenges with this process, with one participant finding the email communications from the Ombudsman to be unclear, and the other participant having compatibility barriers with their assistive technology while using the online portal:

**"I received an email stating "that there are elements that appear to fall within remit." I was not sure what they were referring too."** - Visual, Hearing, Getting Older

**"When I log into the online portal and then press enter on the track link underneath my open complaint, it takes me to a page that lists the status of my current case. There are several links on this page that haven't been labelled correctly or go over multiple lines so my JAWS screen reading software is saying the word "link" but no associated text to go with it."** - Visual; screen reader, keyboard navigation

### *Telephone*

1 participant was contacted by the Rail Ombudsman via email with an evidence request. They were satisfied with the Ombudsman's communications, however, the participant reported finding it difficult to send the evidence. Due to the participant's visual impairment, they were unable to download the evidence onto their device and send it to the Rail Ombudsman. Because of this, the Rail Ombudsman sent the

participant an email on a Friday detailing that the participant had until the following Monday to submit their evidence, otherwise, their case would be closed. The participant was not able to send their evidence in time, so the Rail Ombudsman closed their case, but specified that they would be able to reopen the case if evidence was provided. As this was at the end of the testing period, the participant did not engage further with the process.

It is also important to note that the Rail Ombudsman said that 40 working days had not yet passed since the participant's complaint to the train operator. All 20 complaint scenarios given to participants were over 40 working days, so the participant either accidentally provided the wrong date when they were submitting their complaint over the phone, or the Rail Ombudsman recorded the incorrect date. Nonetheless, this may suggest the reason as to why the Rail Ombudsman required evidence to process the complaint.

All 5 participants checked on the progress of their complaint by calling the Rail Ombudsman, with 4 participants being satisfied with their experience. The fifth participant reported that the Rail Ombudsman did not provide them with clear information concerning their complaint:

**"Person said that it was being reviewed internally before sending it on to the relevant service. Although she did not tell me about the timescale for how long it would take to have the complaint reviewed. Also, when I called nothing was mentioned about me not having submitted the evidence, but if it had been mentioned, I would have said that I could not submit the evidence because I'm blind." - Visual; voiceover on iPhone**

### *SMS*

2 participants used SMS and the other 2 participants used the online portal to check on the progress of their complaint.

Most participants reported facing challenges with this process, with only 1 participant being satisfied with their experience.

1 participant reported having difficulties with using the online portal to check on the progress of their complaint, having forgotten their password, while another participant was unsure how to navigate the portal:

**"I had forgotten my account password. I asked for a password reset but took several attempts. The site did not appear to accept special characters, only letters and numbers and this was not apparent in the instruction. After that, it was easy."** - Hearing, Getting older

**"It wasn't clear where I needed to go to login to track my complaint. It took a lot of random clicking before I stumbled upon the section where I could login."** - Visual; Voice over screen reader on iPhone

The third participant who highlighted a challenge in this process struggled to hear back from the Rail Ombudsman, having sent an SMS to their services multiple times without receiving a response. With the help of the RiDC research team, the participant later realised that their complaint had accidentally not yet been submitted. It was only after submitting their complaint that the participant heard back from the Rail Ombudsman:

**"Firstly I chased up their reply 4 times without any reply, unbeknown I had not completed the form. I would expect if I kept in contact they would say they had not got a complaint from me. They then replied on day 2 after the 5th SMS to acknowledge with a receipt to state it's being checked for conformity or redirection."** - Cognitive, Getting older

### *WhatsApp*

When checking on the progress of their complaint, 3 participants used WhatsApp, 1 participant used the online portal and 1 participant decided to use email.

Most of the participants were satisfied with their experience of checking on the progress of their complaint, but the participant who used the email channel identified a few challenges. They felt that the Rail Ombudsman did not provide enough information about how to check on the complaint progress or timescales as to when an update would be given:

**"Just received an email "one of our advisors will be responding to your enquiry, in the meantime visit our website on [www.railombudsman.org](http://www.railombudsman.org) where you can find our frequently asked questions." No idea how to check progress- no further instructions or information about waiting times or what to expect next. It would be very tedious to keep checking**

**emails daily for response and email could get lost easily if no idea of timeline." - Visual; invert colours, Zoom**

### *BSL*

One participant used the BSL service to check on the progress of their complaint, whereas the second participant used the textphone contact channel. This participant explained having issues with using the BSL service in Task 1 and Task 2, and therefore, decided to try a different avenue for Task 3:

**"First I tried textphone, the textphone-to-textphone number. Someone answered and asked how they could help. Then they hung up! So I tried the Relay UK number instead (textphone but instead of text to text, it's via the relay operator). This call worked fine. I also sent them [the Rail Ombudsman] a WhatsApp message to ask about why it failed via Text to text. They said maybe it was a connection issue and asked me to try again. I then asked them [the Rail Ombudsman] why the BSL interpreter service didn't work, and I'm awaiting a response. Although WhatsApp is more convenient, it's not consistent, so I would use Relay UK if I needed a faster response. But Relay UK is not my preferred method of communication, I only use it when there are no other options." - Hearing; speech input software**

This participant reported feeling dissatisfied with this process, describing that they were frustrated with how it took several attempts and contact channels to be able to communicate with the Rail Ombudsman. The Rail Ombudsman also confirmed that that they did not receive a complaint from this participant, suggesting that the participant may have unknowingly not submitted their complaint. Therefore, it remains unclear as to what kind of update they received from the Rail Ombudsman. The participant who used the BSL contact channel said they were satisfied with this process and didn't highlight any challenges.

#### Task 4

For Task 4, 5 participants were asked to engage with the Rail Ombudsman process of transferring their out-of-scope complaint to another service.

Participants were asked to wait 3 business days for the Rail Ombudsman to contact them about whether their complaint was being transferred to another body. If participants had not heard from the Rail Ombudsman by then, they were asked to contact the Ombudsman themselves and ask for an update.

Overall, 2 participants reported having received contact from the Rail Ombudsman via email informing them that their complaint was not in-scope with their services and was being transferred. Neither participant reported having any difficulties with the Ombudsman's communications. However, the Rail Ombudsman and Transport Focus confirmed that no complaints were transferred. Therefore, it remains unclear as to what email the participants are referring to. A third participant was told that there were aspects of their complaint that might fall within remit of the Rail Ombudsman services, and thus, they were checking with the service provider.

2 other participants contacted the Rail Ombudsman themselves to get an update. One participant was also told that their complaint was being investigated as some aspects seemed to fall within the Ombudsman's remit, while the second participant was told that a response was not yet available:

**"I sent a message Tuesday morning after waiting for 3 days from them to contact me after submitting my complaint. I asked them for an update on my complaint. I got a reply almost immediately, saying 'thank you for contacting us, we'll contact you in our business hours'. Within half an hour of that message, they sent another message saying that my complaint was being looked into to see if it was in-scope for the services. Since then, they have not contact me (it's been a week since I submitted my complaint)." - Getting older**

**"I requested an update via SMS but had no response. I also requested one on the website, I did receive a response to this, informing me that a response to my complaint was not due until March 21st." - Hearing, Getting older**

## Overall experience

Participants were asked to rate their overall experience of engaging in the Rail Ombudsman complaint process on a scale of 1 to 10. The average rating was 7, suggesting that participants generally had a positive experience.

Participants outlined certain aspects of the Rail Ombudsman complaint process, highlighting how easy it was to use the contact channels and communicate with the Ombudsman staff:

**“I personally found the Rail Ombudsman complaints process very easy to engage with. I've had two emails from them acknowledging my complaint and to tell me it has been submitted to the service provider. I've just used the BSL relay service to telephone the Ombudsman and request an update on my case. The person who answered was very nice and helpful.”** - Hearing

**“I'm genuinely surprised at how easy the SMS facility is and the ease of submitting a complaint.”** - Visual, Hearing, Cognitive

**“The initial contact on the phone was excellent, the lady was very helpful.”** - Getting older

**“Apart from the initial website negotiations, I found that the process was easy. They called back when they said they would, I did not have to wait too long on the telephone, and the staff were very pleasant.”** - Visual, Hearing; Screen reader

Nonetheless, some participants were still disappointed with their experience of contacting the Rail Ombudsman, citing failures from the Rail Ombudsman in responding to messages and providing unclear information about the outcome of the complaints:

**“The failure to respond to my progress chasing text was disappointing although I did receive a response to the message I sent via the website.”**  
- Hearing, Getting older

**“I messaged them 4 times without them getting back to me to question my messages when they hadn't recited my form/letter. They did message back to say they would be in touch in up to 14 days to clarify if**

**the complaint was on their remit which was a poor reply. The rules and regulations should be known by them and the complaint about seating is an easy topic to clarify.”** - Cognitive, Getting older

**“I found it a bit confusing trying to work out which way to contact them. I’m still not sure my messages all went to the same place. I am also deaf, so I was aware I had no way of telling them not to contact me by phone.”**  
- Hearing, Getting older

**“It’s long-winded, and it took close to 48 hours to get a WhatsApp reply.”** - Visual, Cognitive; screen magnification, large pointer

A few other participants discussed their experience with the Rail Ombudsman communications, referencing their language as ‘clear’ and ‘easy to understand’ but citing a lack of information from the Ombudsman:

**“They responded very quickly. The only reason why it’s not a 10 is because the process has not yet been concluded, I still don’t know if my complaint is in-scope. Their language was clear and easy to understand for me, but maybe others may require different formats.”** - Getting older

**“The barriers faced in getting touch with them, and the overly wordy application form reduces the score. Also, there is no email confirmation when you send a complaint, the only way of knowing if it was processed is by logging into the portal. There should be an email confirmation with the reference number, making it easier to follow up when you call them.”**  
- Hearing; Speech input software

This participant who mentioned not having received a confirmation email was one of the participants that the Rail Ombudsman did not receive a complaint from. This helps explain why the participant did not receive a confirmation email.

When looking at the average scores of people’s experience across tasks 1, 2 and 3, the table below provides an overview how satisfied participants were. Overall, participants found most aspects to be somewhat easy to complete, with the exception of finding the downloadable application form, which several participants highlighted the challenges of.

How easy or difficult was it to find the Ombudsman contact channel?	63%
How easy or difficult was it to contact the Ombudsman to receive the Quick Start Guide?	66%
How easy or difficult was it to contact the Ombudsman about making a complaint?	71%
How easy or difficult was it to find the complaints online portal on the Rail Ombudsman website?	83%
How easy or difficult was it to find the downloadable application form (PDF) on the Ombudsman website?	50%
How easy or difficult was it to check on the progress of your complaint?	73%

Extremely easy	81 to 100%
Somewhat easy	61 to 80%
Neither easy /difficult	41 to 60%
Somewhat difficult	21 to 40%
Extremely difficult	1 to 20%

Table 7 – Mystery shopping results for finding and receiving information from the Rail Ombudsman

Participants were also asked about their thoughts on the accessibility of the Rail Ombudsman process. 2 participants said that the process was inaccessible to them, while the majority of participants reported that the process was accessible (14) or accessible to *some* extent (4).

Those who found the process to be inaccessible, highlighted having difficulties with contacting the Rail Ombudsman (this was one of the BSL participants) and using the downloadable application form (PDF):

**“Whilst the online portal was fairly accessible (despite its flaws i.e., content), trying to get in touch with them was not.”** - Hearing; speech input software

**“No clear instruction. Requesting audio quick guide took several hours. No way of downloading pdf form to fill. Had to use link in help guide from RIDC. Would put me off from complaining in future due to no clear instructions.”** - Visual; invert colours, Zoom

Those who said the process was accessible to *some* extent mentioned finding the process to be confusing and overly complicated, feeling that it could be simplified and more user friendly:

**“I am not very tech savvy and found it a little confusing with too many options.”** - Hearing, Cognitive, Getting older

**“As I mentioned before, it can be confusing in places and has definitely not been laid out to be as user friendly. It could be streamlined and lots of the back and forth could be removed for a more layman's friendly experience.”** - Hearing, Cognitive; screen magnification

**“I feel I could go through them but it is far more complicated than it needs to be. If I didn't have all the answers scripted for me I feel there would be questions I would struggle to understand. I like that you could talk through WhatsApp but it could be a lot more accessible and simple especially if you're asking for easy read! Feels like the person you're speaking to isn't aware and being considerate of you asking for this and being so formal and almost robotic because it feels scripted and not adjustable to people with different needs.”** - Visual, Cognitive

**“I felt that on the whole the ombudsman was accessible however, more clarity with regards to questions from them regarding my complaint could have been explained better.”** - Visual, Hearing, Getting older

Finally, those who found the process to be accessible to their needs highlighted several aspects, including being able to use assistive technology:

**“The website was screen reader friendly. They sent me the audio guide without much difficulty. I was able to complete all of the tasks without assistance.”** - Visual; Voice over screen reader on iPhone

**“I felt like everything worked well enough with my voice-over, and the fact that I was able to use my phone. The Ombudsman asked me whether I had any reasonable adjustments, which I said I did. However, I do not feel like they would have let me submit the complaint over the phone had I not had reasonable adjustments (which is understandable as it does take quite a while).”** - Visual; voiceover on iPhone

Participants also felt that the process was straightforward and appreciated the Rail Ombudsman ability to cater to different access needs:

**“Dealing with The Rail Ombudsman was very straight forward and I found all aspects were accessible to me.”** - Visual, Cognitive, Getting Older; screen magnification software

**“Not needing to speak to someone on the phone is a huge bonus for me as my voice is weak and I struggle with auditory processing delay. I find the SMS and online format to be more efficient and hopefully it proves just as effective.”** - Visual, Hearing, Cognitive

**“The Rail Ombudsman process was accessible to me because I am a Deaf person who uses BSL, but who has English as her first language. This is because I went deaf when I was 5. A native BSL user (who would not have learnt English until later on in life) would not be able to engage effectively with the process, but would need a great deal of support. The fact that the Ombudsman provides BSL relay service is a great asset - well done to them. They might need to know that BSL users are going to need support with the whole process and to be ready for this.”** - Hearing

## Recommendations

Below is a set of recommendations based on the technical testing, web testing and mystery shopping components to ensure accessibility of the Rail Ombudsman website and contact channels.

### Technical testing recommendations

1. Repeat technical testing audit at least every two years, including as part of any significant update to the website.
2. As part of this work three detailed reports with error descriptions and their associated HTML code line numbers have been supplied to the Rail Ombudsman. These also contain links to the WCAG website where full explanations are given of the error codes alongside advice on best practice of how to avoid them.
3. Ensure the Rail Ombudsman website coders read the website user-testing feedback from the participants to see the real-life impact of not supporting assistive technologies such as screen readers.

### Web testing recommendations

1. Make links to important content as clear as possible to help with navigating the website. For example, by bolding key information and where appropriate, ensuring key links can be found within the main homepage, thereby minimising the need to search through lots of information. This could apply to all aspects of the website, with a particular focus on the Quick Start Guide and downloadable application form (PDF).
2. Provide alternative formats such as 'easy read' guides. A gov.uk definition of 'easy read' is highlighted under the heuristics section above. Ensuring these 'easy read' guides are easily locatable within the website minimising the need to request them. This could apply to all aspects of the website, with a particular focus on the Quick Start Guide.
3. Consider inbuilt 'read aloud' function and video content to explain key processes.
4. Consider adding accessibility software/an accessibility toolbar, such as Recite Me.
5. Ensure any complex language, particularly legal terminology is explained throughout the website. For example, by providing a key terms guide to

explain definitions that may not be common knowledge. Ensuring the most important terms are explained in an 'easy read' version that is easily found.

### **Mystery shopping recommendations**

1. Provide alternative formats to PDF, like a webpage or Word document, as PDF documents are not always accessible to people using assistive technology.
2. Ensure all aspects of the website, portal, downloadable forms, and Quick Start Guide are accessible to assistive technology.
3. Use clear and simple language in all customer facing communications; the Rail Ombudsman complaint process may be unfamiliar to many, and users don't always understand what different terms mean.
4. Ensure clear information about the Rail Ombudsman processes and timescale is available and given to users.
5. Consider having all accessibility information and resources more clearly signposted on the home page so that users can easily find them.

# Appendices

## Appendix 1: Technical testing

### Scope

Testing of Rail Ombudsman website, portal, and CMS, was undertaken in February/ March 2024.

Accessibility Guideline	Notes	Checked
WAI-ARIA 1.2	Accessible Rich Internet Applications (WAI-ARIA) 1.2 is a World Wide Web Consortium (W3C )Recommendation	Yes
JAWS Screen Reader Compatibility	<a href="https://webaim.org/techniques/screenreader/">https://webaim.org/techniques/screenreader/</a>	Yes
NVDA Screen Reader Compatibility		Yes
VoiceOver Screen Reader Compatibility		Yes
PDF/UA - Matterhorn Protocol 1.02	This is a set of checks and failure conditions for the universal accessibility of PDF documents.	No
Web Content Accessibility Guidelines 2.2 Level AA (WCAG 2.2 - 2023)	<a href="https://www.w3.org/TR/WCAG22/">https://www.w3.org/TR/WCAG22/</a>	Yes

## Results – Website (522 pages inspected)

Level	Total number of issues	Breakdown of total number of issues	Number of pages affected	Overall % of pages left with issues <sup>1</sup>	Notes
A	10	-	116	23%	-
A	-	2	116	6%	At most*
A	-	2	24	2%	At most*
A	6	-	9	2%	At most*
AA	1	-	13	2%	-

\*The number of pages affected by an accessibility WCAG issue are not exclusive. i.e., more than one issue can occur on a page. The number given under 'Overall % of pages left with issues' assumes the issues occur on as many unique pages as possible and therefore are the most possible number of pages with issues.

## Results – Portal (28 pages inspected)

Level	Total number of issues	Breakdown of total number of issues	Number of pages affected	Overall % of pages left with issues	Notes
A	1	-	2	7%	-
A	-	1	2	0%	-

## Results – CMS (61 pages inspected)

Level	Total number of issues	Breakdown of total number of issues	Number of pages affected	Overall % of pages left with issues <sup>1</sup>	Notes
A	9	-	2	3%	-
A	-	3	2	3%	At most**
AA	4	-	2	3%	-

\*\*The number of pages affected by an accessibility WCAG issue are not exclusive. i.e., more than one issue can occur on a page. The number given under 'Overall % of pages left with issues' assumes the issues occur on as many unique pages as possible and therefor are the most possible number of pages with issues.

## **Appendix 2: Details of mystery shopping consumer journeys**

This appendix details the specifics of the consumer journeys that participants took for each contact channel.

Some consumer journeys vary across participants because they were instructed to carry out slightly different tasks. For example, one participant was asked to request the Quick Start Guide in Braille, and another was asked to request a large-print format. Another example could be that one participant was asked to submit evidence during task 2, while others were asked to submit evidence during task 3 once the Rail Ombudsman had asked for it.

### **Contact channel: Email**

**1 participant contacted the Rail Ombudsman via email and completed consumer journeys 1, 2 and 3, requesting the Quick Start Guide in a braille format.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found a contact email address and sent an email to the Rail Ombudsman requesting the Quick Start Guide in Braille format. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participant contacted the Rail Ombudsman service via email and asked to make a complaint. They then submitted their complaint via the online portal and were asked not to submit their evidence at this stage. (Note: As we were testing the accessibility of the process it's important to mention that submitting a complaint via the online portal wasn't what the Ombudsman recommended, rather what the participant chose to do. The participant was instructed to not submit their evidence in task 2 to see if the Ombudsman would contact them at the next stage to ask for evidence. This was to create a sample of people who might need to engage further in the complaints process.)

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by accessing their existing complaint on the online portal. Participant was not contacted by the Rail Ombudsman for an evidence request, so they did not have to submit evidence.

**1 participant contacted the Rail Ombudsman via email and completed consumer journeys 1, 2, and 3, requesting the Quick Start Guide in a large-print format.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found a contact email address and sent an email to the Rail Ombudsman requesting the Quick Start Guide in large-print format. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participant contacted the Rail Ombudsman service via email and asked to make a complaint. Then, they submitted their complaint via the downloadable application form and was asked not to submit their evidence. (Note: The participant was instructed to not submit their evidence in task 2 to see if the Ombudsman would contact them at the next stage to ask for evidence. This was to create a sample of people who might need to engage further in the complaints process.)

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by sending an email. Participant was contacted by the Rail Ombudsman for an evidence request and submitted their evidence.

**1 participant contacted the Rail Ombudsman via email and completed consumer journeys 1, 2, 3 and 4.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found a contact email address and sent an email to the Rail Ombudsman requesting the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participant contacted the Rail Ombudsman service via email and asked to make a complaint. They then submitted their complaint via the online portal.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by accessing their existing complaint on the online portal. Participant was contacted by the Rail Ombudsman for evidence and submitted it.

Task 4: Get a case transferred to another body.

Participant submitted an out-of-scope complaint and was told that their complaint would be transferred to another service who could assist them further (Note: The Rail Ombudsman has reported that none of the out-of-scope cases were transferred to another service, therefore, it's likely the participant misunderstood).

### **1 participant contacted the Rail Ombudsman via email and completed consumer journeys 1, 2 and 3.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found a contact email address and sent an email to the Rail Ombudsman requesting the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participant contacted the Rail Ombudsman service via email and asked to make a complaint. They then submitted their complaint via the online portal and submitted their evidence.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by sending an email.

### **Contact channel: Telephone**

**Five participants contacted the Rail Ombudsman via telephone and completed consumer journeys 1, 2 and 3.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participants accessed the Rail Ombudsman website, found a telephone contact number and called to request the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Note: One participant contacted the Ombudsman via email instead of telephone to ask for the Quick Start Guide. The participant then went on to use the telephone contact channel for the rest of their tasks.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman via a phone call and asked to make a complaint. Then, they submitted their complaint via telephone.

Note: One participant submitted their complaint through the downloadable application form instead.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participants checked on the progress of their complaint by contacting the Rail Ombudsman via telephone. One participant was contacted by the Rail Ombudsman for an evidence request but was not able to download the evidence document, and thus, did not submit their evidence.

### **Contact channel: SMS (text message)**

**1 participant contacted the Rail Ombudsman via SMS and completed consumer journeys 1, 2, and 3 requesting the Quick Start Guide in an audio format.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found an SMS contact number and sent an SMS to the Rail Ombudsman requesting the Quick Start Guide in audio format. Then, they listened to the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participant contacted the Rail Ombudsman service via SMS and asked to make a complaint. They then submitted their complaint via the online portal.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by accessing their existing complaint on the online portal.

**1 participant contacted the Rail Ombudsman via SMS and completed consumer journeys 1, 2 and 3.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found an SMS contact number and sent an SMS to the Rail Ombudsman requesting the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participant contacted the Rail Ombudsman service via SMS and asked to make a complaint. They then submitted their complaint via the online channel.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by sending an SMS.

**2 participants contacted the Rail Ombudsman via SMS and completed consumer journeys 1, 2, 3 and 4.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participants accessed the Rail Ombudsman website, found an SMS contact number and sent an SMS to the Rail Ombudsman requesting the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman service via SMS and asked to make a complaint. Then, they submitted their complaint via the online channel. One participant was not given evidence to submit.

Task 3: Engage with the Rail Ombudsman complaints handling process.

One Participant checked on the progress of their complaint by sending an SMS while the other participant by accessing their existing complaint on the online portal. The Participant who did not submit evidence was not contacted by the Rail Ombudsman for an evidence request, so they did not have to submit evidence.

Task 4: Get a case transferred to another body.

One participant who submitted an out-of-scope complaint was told that their complaint was being investigated to see whether it fell within remit, while the other participant contacted the Ombudsman themselves to get an update and was told they'd hear back within a specific time frame.

### **Contact channel: WhatsApp**

**2 participants contacted the Rail Ombudsman via WhatsApp and completed consumer journeys 1, 2, and 3 requesting the Quick Start Guide in an easy-read format.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participants accessed the Rail Ombudsman website, found a WhatsApp contact number and sent a WhatsApp message to the Rail Ombudsman requesting the Quick Start Guide in an easy-read format. At the time of writing up the research

findings they had still not received their easy-read Quick Start Guide, after having requested it on the 12<sup>th</sup> of March.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman service via WhatsApp and asked to make a complaint. Then, one participant submitted their complaint via the online portal while the other submitted their complaint via the downloadable application form. One participant was asked not to submit any evidence.

Task 3: Engage with the Rail Ombudsman complaints handling process.

One participant checked on the progress of their complaint by sending a WhatsApp message, while the other participant by accessing their existing complaint on the online portal. The Participant who did not submit evidence was not contacted by the Rail Ombudsman for an evidence request, so they did not have to submit evidence.

**1 participant contacted the Rail Ombudsman via WhatsApp and completed consumer journeys 1, 2, 3 and 4, requesting the Quick Start Guide in an audio format.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participants accessed the Rail Ombudsman website, found a WhatsApp contact number and sent a WhatsApp message to the Rail Ombudsman requesting the Quick Start Guide in an audio format. Then, they listened to the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman service via WhatsApp and asked to make a complaint. Then, they submitted their complaint via the downloadable application form.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by sending an email (Note: participant was asked to use WhatsApp but decided to use email instead for tasks 3 and 4).

Task 4: Get a case transferred to another body.

Participant who submitted an out-of-scope complaint was told that their complaint would be transferred to another service to assist them further (Note: The Rail Ombudsman has reported that none of the out-of-scope cases were transferred to another service, therefore, it's likely the participant misunderstood).

**1 participant contacted the Rail Ombudsman via WhatsApp and completed consumer journeys 1, 2, 3 and 4, requesting the Quick Start Guide.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found a WhatsApp contact number and sent a WhatsApp message to the Rail Ombudsman requesting the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman service via WhatsApp and asked to make a complaint. They then submitted their complaint via the downloadable application form.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by sending a WhatsApp message.

Task 4: Get a case transferred to another body.

Participant who submitted an out-of-scope complaint contacted the Ombudsman to get an update and was told their complaint was being investigated to see whether it fell within remit.

**1 participant contacted the Rail Ombudsman via WhatsApp and completed consumer journeys 1, 2, and 3, requesting the Quick Start Guide.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participant accessed the Rail Ombudsman website, found a WhatsApp contact number and sent a WhatsApp message to the Rail Ombudsman requesting the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman service via WhatsApp and asked to make a complaint. Then, they submitted their complaint via the downloadable application form. Participant was not given any evidence to submit.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participant checked on the progress of their complaint by sending a WhatsApp message. Participant was not contacted by the Rail Ombudsman for an evidence request, so they did not have to submit evidence.

**Contact channel: BSL**

**Two participants contacted the Rail Ombudsman using the BSL interpreter service, and completed consumer journeys 1, 2 and 3.**

Task 1: Access information about the Ombudsman service and find out how to raise a complaint.

Participants accessed the BSL interpreter service and requested the Quick Start Guide. Then, they read the guide to see if it was accessible to them.

Task 2: Raise a complaint and submit it to the Rail Ombudsman.

Participants contacted the Rail Ombudsman through the BSL interpreter service and asked to make a complaint. Then, they submitted their complaint via the online portal.

Task 3: Engage with the Rail Ombudsman complaints handling process.

Participants checked on the progress of their complaint by contacting the Rail Ombudsman via the BSL interpreter service.