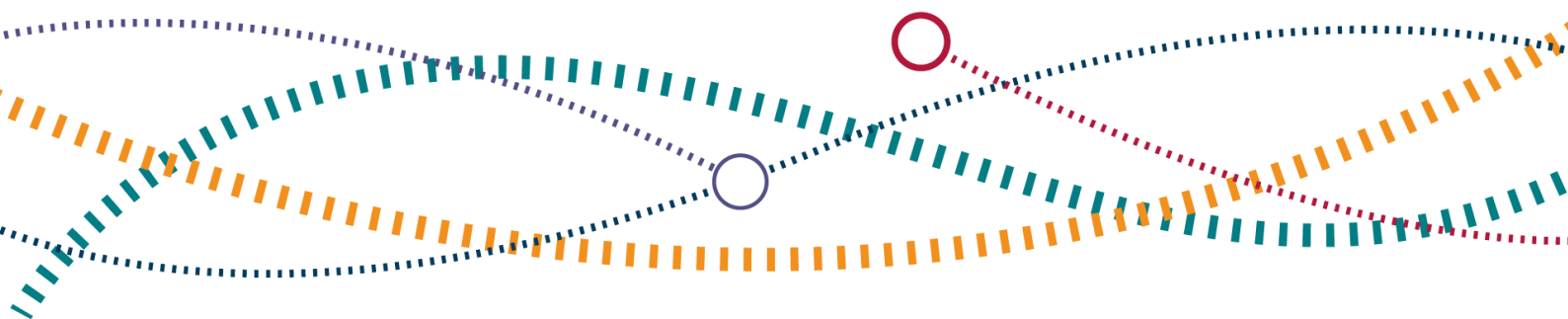# Towards accessible assisted travel information

A review of train and station operators' compliance with Accessible Travel Policy website obligations

6 April 2021

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Executive summary

As part of the revised Accessible Travel Policy (ATP) guidance published in July 2019[1], train and station operators are required to provide a source of relevant information on assisted travel on their websites, and work towards achieving the Website Content Accessibility Guidelines standards set by the main international standards organisation of the internet. These obligations play an important role in ensuring operators' websites communicate effectively to all passengers and that information provided about assistance is clear and accessible.

ORR undertook two separate reviews in 2020 to assess operators' current compliance with these ATP guidance requirements:

● The first, to assess the provision and navigation of assisted travel information on all operators' websites; and

● The second, a snapshot of current technical compliance of operators' websites with the Website Content Accessibility Guidelines (WCAG) 2.1 standard, level AA.

Key findings

Review of availability and accessibility of assisted travel information

– All operators provided a source of relevant information on assisted travel on one page on their website.

– Only one operator had available all of the required information on assisted travel.

– The majority of operators have already made the changes to their websites and the remaining ones have set out a reasonable timeline for delivery.

Review of WCAG 2.1, Level 'AA' compliance

– Current compliance with the WCAG 2.1 'AA' standard varies quite significantly across operators.

All operator websites shared some of the same accessibility errors.

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[1] https://www.orr.gov.uk/sites/default/files/2020-09/accessible-travel-policy-guidance-for-train-and-station-operators_2.pdf (September 2020 update.)

We undertook both reviews between July and September 2020 and in November 2020 we wrote to all operators individually, detailing the outcomes of these reviews. For the availability and accessibility of assisted travel content, we listed the outstanding information each operator needed to make available on its website, and set a timeframe for completion. For compliance with the WCAG standard, we requested a workplan from each operator, setting out how they will address the issues identified in their review and by when, and at the very latest by 31 December 2021.

We are pleased that operators responded to their actions promptly regarding their updates to the assisted travel content. And we are encouraged to see a shift towards addressing the accessibility errors highlighted in our WCAG review sooner rather than later. We recognise the efforts needed by several teams within operators to make sure these changes take place in this area.

All operators have committed to ensure their websites are compliant with the WCAG 2.1 standard by 31 December 2021.

Next steps

We will continue to monitor the delivery of assisted travel information on operators' websites, and we will track the progress of each operator's progress towards compliance with the WCAG 2.1 standard in the lead up to the December 2021 deadline.

Background

1   Train and station operators must as a condition of their operating licence, publish an Accessible Travel Policy (ATP) setting out a range of commitments to disabled and older people travelling by rail and providing useful information for passengers. In July 2019, ORR published revised Guidance on how to write an ATP (since updated in September 2020). This included new requirements for operators to increase the amount of information on assisted travel on their websites.

2   This report summarises the work ORR undertook to assess operators' current compliance with Section 4, A2.5 (Websites) of the Guidance. A summary of these requirements are listed below.

Summary of requirements

3   The Guidance, published in July 2019 and subsequently updated in September 2020, requires all operators to:

- Commit to working towards achieving the industry-recognised Website Content Accessibility Guidelines (WCAG) 2.1 standard (A2.5.1);

- Use consistent terminology when referring to assistance services, including the term Passenger Assist when referring to booking assistance;

- Include an Assisted Travel icon or hyperlink on their homepage to direct the passenger to a one page source of information on their assistance services; and on that one page:

- Provide all of the required information to help guide and support a passenger's understanding of the services available. A breakdown of these requirements can be located in Section 4, A2.5.2 (a – g) of the Guidance.

4 All operators are required to set out their commitment to meet these requirements in their ATPs before they can be approved by ORR. Several have specified their own target date in which compliance with the WCAG 2.1 standard will be met and we have signposted this information in our decision letters which confirm their ATP approval.

5 The former Disabled Person's Protection Policy (DPPP) also required operators to provide accurate and consistent information to disabled passengers and to take into account the needs of disabled passengers when communicating information by working towards W3C standards for website accessibility.

ORR review of compliance

6 Between July and September 2020, ORR undertook two separate reviews to assess operators' current compliance with the ATP Guidance requirements:

- The first review was undertaken by the ORR accessibility team and looked at the provision and navigation of assisted travel information on all operators' websites.

- The second review was undertaken by the charity Shaw Trust using automated software designed to provide a snapshot for ORR of current technical compliance of operators' websites with WCAG 2.1 standard, level AA.

Review of availability and accessibility of assisted travel information

Outline

7   Each operators' website was assessed against all of the requirements listed under A2.5.2 of the ATP Guidance. At the time of the review and also the publication of this report, not all operators' ATPs are approved. Therefore, operators with approved AT Ps are obliged to meet the requirements, and operators with draft ATPs not yet approved are expected to meet the requirements on approval.

Findings

8   All 25 operators demonstrated they had made updates to align with some of the new requirements in the Guidance, however only one operator had updated their website to reflect all of them. This meant that the remaining 24 operators did not have available all of the assisted travel information at the time of review.

Good practice

- We were encouraged to find that 23 operators had in place a clear assisted travel icon or hyperlink on their homepage, making the information identifiable to passengers.

- All 25 operators provided a page focussed solely on assisted travel information with some key information on how to book assistance for their service, and details of national discounts available to disabled passengers or persons with reduced mobility.

- The 5 operators that operate a scooter permit scheme, all provided clear information on how a passenger can obtain these to travel on their service.

Areas for improvement

- 24 operators did not set how passengers are able to claim redress when assistance has not been delivered as booked.

- 17 operator websites had information on temporary reductions in accessibility and details of any delays and disruptions to facilities and services located elsewhere on their website, potentially making it inaccessible to a passenger. This type of information is critical for disabled passengers planning their journeys, and it is a requirement to have this information clearly signposted on the assisted travel page.

Outcome

9   We wrote to all operators in November 2020, detailing our findings and provided them with a list of actions to meet by January 2021. All operators responded positively to our request, either making the required website changes or setting out a timeline for delivery.

10   Following a review of each response and the subsequent actions taken by them, we have assessed our level of assurance for each operator in meeting our requirements. For ease, they currently fall under two categories:

● Category 1: Fully compliant

● Category 2: On the path to achieve full compliance.

11   Operators which fall under category 2 have either provided a sufficient workplan to meet all of their actions, or are waiting until their ATP is shortly approved – at which point they are able to update all of the related information on their page.

Table 1: List of operators and their compliance category

Fully compliant operators	Operators on path to compliance
Avanti West Coast	Arriva Rail London
Chiltern	Caledonian Sleeper
c2c	Heathrow Express
Cross Country	London Underground
East Midlands Railway	Network Rail
Grand Central	Northern Rail
Greater Anglia	TFL Rail
Govia Thameslink Railway	
GWR	
Hull Trains	
LNER	
Merseyrail	
Scotrail	
Southeastern	
South Western Railway	
Transport for Wales	
Transpennine Express	
West Midlands Railway	

Next steps

12   The ORR welcomes the evidence of good practice and consistent approach across operators. We note that operators have also moved quickly to update their websites with the required assisted travel information. We will continue to monitor operators' provision of their assisted travel information as part of our ongoing ATP monitoring work.

Review of WCAG 2.1 compliance

Outline

13   ORR engaged the charity Shaw Trust to carry out an automated technical review of operators' websites. This was designed to highlight any accessibility errors that may have required attention as operators work towards meeting the WCAG 2.1 standard.

Findings

14   The results of the review indicated that the current compliance with the WCAG 2.1 standard varies quite significantly across operators. The review highlighted common issues across all operators' websites and all were found to have the following accessibility errors:

- Default language not set: Assistive technologies such as screen readers need to be able to detect which language the information is presented in so they can use the appropriate pronunciation standards to translate the web resource.

- Empty links: This refers to cases where a link does not have any text content. The text of a link should provide a clear description of the link and the link's purpose. Providing descriptive link text will allow users to easily determine the function of the link and make educated decisions whether or not to click the link.

Similarly approximately 22 out of the 25 websites had the following accessibility errors:

- Missing page title: A descriptive title helps passengers understand a page's purpose or content. Without a proper title, many passengers (especially those using screen readers or other assistive technology) may have difficulty orienting themselves to the page.

- Inaccessible Non-HTML Documents: This is an issue when downloadable documents such as policies or guidance materials are not formatted correctly to make them readable to passengers.

- Insufficient colour contrast: Passengers who have a vision impairment need a strong contrast between the text and the background.

- The review also highlighted approximately 15 operators' sites featured empty headings which happens when empty space is between headings or text. Headings are an important tool for screen readers navigate with ease around a

document. If there are empty headings, a passenger may wonder if they are missing essential content.

Outcome

15 In our letter of November 2020, we requested that each operator provide a workplan by January 2021 which set out how they were going to address the accessibility errors found on their website and allowed 12 months for these to be made.

16 All operators responded to our letter and have a plan to meet compliance by 31 December 2021. Encouragingly:

- 11 operators had already carried out extensive work to ensure their website met the standard prior to our review;

- Several operators used this exercise as an opportunity to ramp up the work they had already planned; and

- We have received workplans from operators where the majority are committed to completing the work in the next six months.

Next steps

17 We will track the progress of each operator's workplan for compliance with WCAG 2.1 standard in the lead up to the December 2021 deadline. We will discuss this as part of our ongoing ATP quarterly meetings we hold with each and every operator to monitor their progress in meeting their ATP commitments.

18 Following the December deadline, we will deliver further testing to understand the progress made, and we will work with industry and disabled people's organisations to ensure this is a full assessment of accessibility.