Hassell Inclusion & UK Civil Aviation Authority:
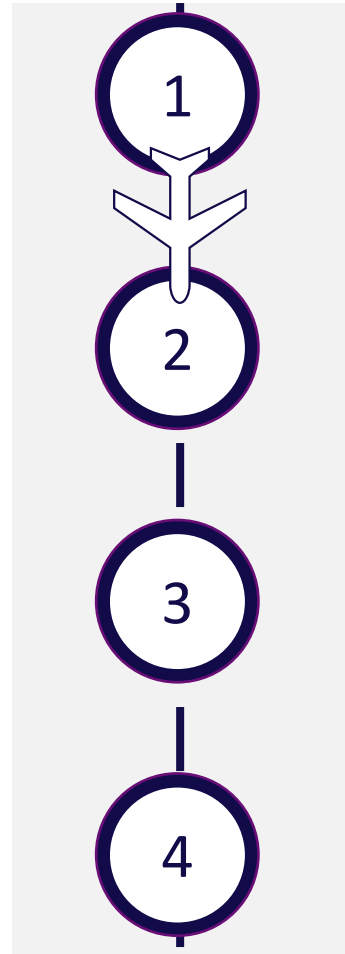# Airline Digital Accessibility Report

March – June 2023

About This Report

- This project was carried out by Hassell Inclusion in response to a brief from the UK Civil Aviation Authority.

- If you reference this report, please reference Hassell Inclusion & UK Civil Aviation Authority.

- Report Authors:
  - Professor Jonathan Hassell
    - CEO Hassell Inclusion
  - Yacoob Woozeer
    - Accessibility and Usability Consultant
  - Liam Hassell
    - Business Accessibility Consultant

Contents

1. **Executive Summary**

2. **Targeted Technical Audits & Airline Scoring**

3. **Direct Consumer Feedback (Speed Dating)**

4. **Summary**

1. Executive Summary

| Content	Page
What is Digital Accessibility?	
Purpose of this Report	
Why This Report Matters	
Report Methodology	
5 Key Findings	
Overall High-level Airline Website Accessibility Ranking: Top	
Overall High-level Airline Website Accessibility Ranking: Bottom	
5 Ways All Airlines Can Improve	

hi

What is Digital Accessibility?

Digital accessibility is about ensuring equal access for those with additional needs by removing digital barriers. Different people may have different barriers or a combination changing how they:

See — Touch — Hear — Speak — Think
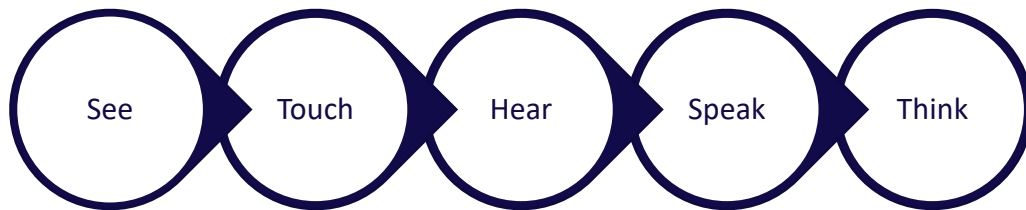
To get a quick introduction to digital accessibility, watch the 95 second video – Hassell Inclusion: Why Digital Inclusion

20% of the UK population has a **permanent disability**, and in an ageing society, **an additional 20%** have a **progressive impairment.**

(Source: Family Resources Survey: Financial year 2020/21 and

Overview of the UK Population November 2021)
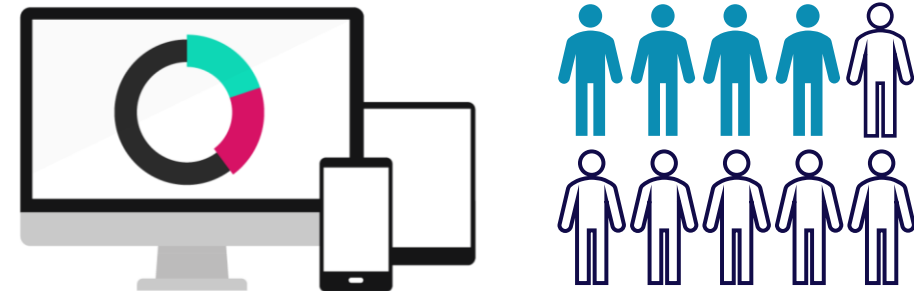
That's **4 out of 10 people** who need accessible digital solutions.

Purpose of This Report

- The **UK Civil Aviation Authority (CAA)** is responsible for ensuring the rights of disabled and less mobile people are upheld when it comes to air travel. These rights are set out in legislation.

- To support this, the CAA is consulting on the **development of an Airline Accessibility Framework.** As part of this, they are including a section on **website accessibility and the provision of essential information** reflecting the obligations on airlines to meet the requirements set out in guidance to the legislation.

- In addition, the CAA recognises that digital accessibility goes beyond technical compliance with specific guidance: with a need to drive best practice and to consider end to end digital consumer journeys from a practical usability perspective informed by direct consumer feedback which should be undertaken on an ongoing basis.

- In early 2023, the CAA commissioned Hassell Inclusion to undertake a **'one-off' targeted audit and rank the digital accessibility of 11 airlines** who have the highest passenger numbers from UK airports (or where an airline provides a high proportion of flights in a particular UK region).

The report focuses on two areas:
- Website Accessibility – using a **dual approach** looking at **WCAG 2.1 AA** (Web Content Accessibility Guidelines) compliance as well as the **overall consumer digital journey**.
- Direct Consumer Feedback – to **hear directly from consumers** with access needs on what their experiences are and how they can be improved.

- The purpose of this report is not to be punitive, but instead to **shine a light and increase transparency** of airlines' compliance with relevant accessibility regulations, as well as **generate insights** from people with disabilities to guide future best practice. This audit is separate but complementary to the CAA's Airline Accessibility Framework.

- The CAA appreciate that accessibility is an ongoing process, and that each airline is on their own journey. The aim here is to encourage airlines, through this report, to **expand their knowledge on accessibility** and **enhance their digital experiences for consumers**.

Why This Report Matters

As the aviation industry embraces digitalisation, including greater use of Automation and Artificial Intelligence, it is vital that consumers' initial points of access, such as websites and apps, prioritise accessibility to ensure inclusivity for all users. Non-digital channels of access should also be provided to mitigate the risk of digital exclusion.

That means everything from **websites and apps** to **printed tickets and brochures** need to be accessible as well as providing non-digital channels such as **telephone lines**.
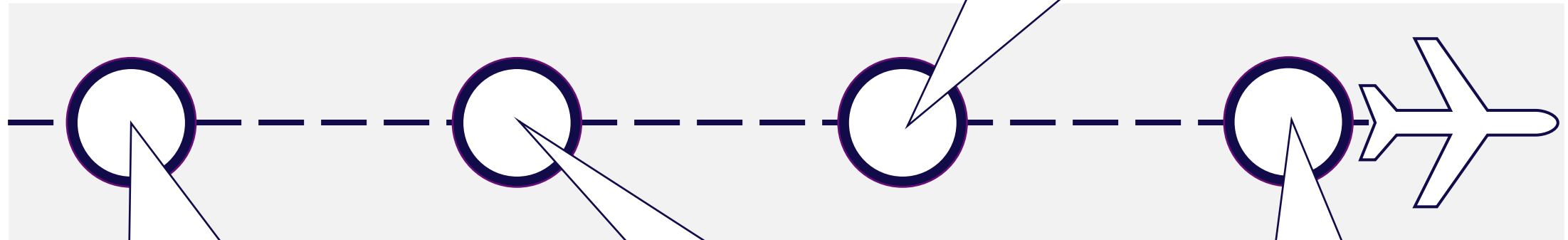
In 2022 over **224 million passengers travelled to and from the UK**. That could be up to **44.8 million or 20% of people that need digital accessibility.**
Source: UK Civil Aviation Authority (2023)

Through **improving accessibility**, airlines can **reduce the difficulties** individuals may have **and increase their access to air travel.**

But it is also in the commercial interest of the airlines to improve as they **increase their reach to an under supported market.**

Report Methodology
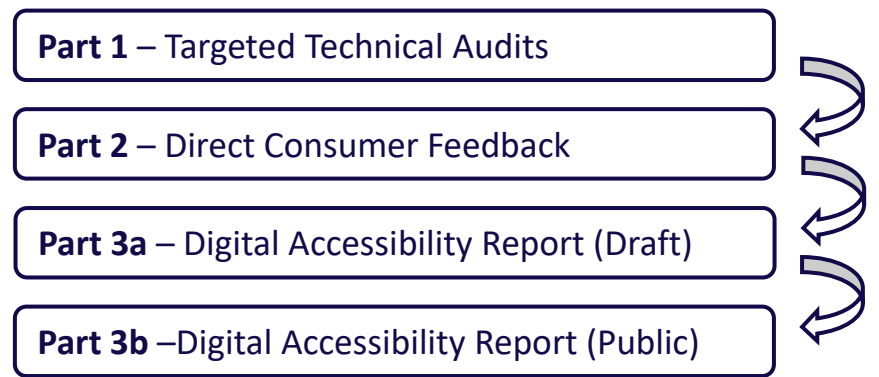
Part One – Targeted Technical Audits

- We worked with **11 airlines** to evaluate the accessibility of key consumer-facing aspects of their digital content, recording these sessions live and sharing them afterwards.
- The audits reviewed specific user journeys on airline's websites (not the whole site) looking at WCAG 2.1 AA criteria and beyond into areas like digital inclusion.
- The audits fed into a scoring system which provides a **high-level rating of website accessibility based on Hassell's expert view** as well as **common themes and how to improve.**
- **Apps** are often a key part of the user journey, so we have also **provided high-level guidance** on common barriers and how to overcome these.

Part Two – Direct Consumer Feedback (Speed Dating)

- Through a process called "speed dating" we gathered **direct consumer feedback** by talking to **real consumers with disabilities and different accessibility needs**.
- This process allowed the airlines, the CAA and the CAA's Consumer Panel to **discuss directly with users** what their experience was, how it differed from their needs and expectations, and ways it could be improved.
- The key themes were then collated from the sessions and summarised to provide both airlines and the CAA with **actionable insights**

Part Three – Digital Accessibility Report

- The results from were **scored in two ways**: airlines websites were first given a score for their **compliance with WCAG 2.1 AA.** Then secondly, a score for the **accessibility of the overall consumer digital journey** taking into account additional elements beyond those of just compliance.
- Each airline was provided the opportunity to comment on their individual findings prior to publication of this report. These comments have been included within the relevant sections.

Part 1 – Targeted Technical Audits

Part 2 – Direct Consumer Feedback

Part 3a – Digital Accessibility Report (Draft)

Part 3b –Digital Accessibility Report (Public)

5 Key Findings

1 **Improvement Potential**: No airline is perfect and there were big differences between airline's level of accessibility, both in terms of technical WCAG compliance and the digital consumer journey. This indicates room for improvement across the board, even with airlines that are further along their accessibility journey.

2 **Lack of Consumer Research**: Airlines are not currently conducting consistent and ongoing research with consumers with access needs. The consumer feedback sessions highlighted that users have different accessibility needs, and airlines would benefit from engaging directly with them to discover how they can improve their experiences.

3 **Accessibility is viewed in silos**: Accessibility for some airlines has been viewed in silos, rather than across the full digital consumer journey. Airlines should extend their approach to accessibility beyond websites & apps, to consider all consumer touchpoints through the booking and travel experience, including requesting special assistance and 3rd party integrations.

4 **Need to increase transparency**: Airlines generally lack transparency and upfront disclosure regarding the accessibility of their websites, with either missing or inaccurate accessibility statements which can be particularly important to consumers. This can hinder consumers' ability to make informed decisions and access necessary support.

5 **Accessibility is not just WCAG**: Airlines should consider usability and digital inclusion best practices, viewing accessibility beyond technical WCAG compliance. Accessibility encompasses a broader perspective that prioritises user experience for all, for example considering text size for users with visual and cognitive impairments.

Overall High-Level Airline Website Accessibility Ranking (1)

Airline	WCAG (out of 10)	Digital Consumer Journey (out of 10) ⭐ = 2	Comments	Airline response (on page)
British Airways	9	⭐⭐⭐⯪ = 7	• Very good WCAG compliance with an accurate helpful accessibility statement • Easy to find contacts with good usability and best practice • Cannot book assistance during the booking journey • Freephone number for assistance	Page 24
Emirates	8	⭐⭐⭐ = 6	• Good WCAG compliance with an accurate helpful accessibility statement • Easy to find contacts with good usability and best practice • Cannot book assistance during the booking journey • Costed number for assistance	Page 27
EasyJet	7	⭐⭐⭐⯪ = 7	• Good WCAG compliance with a helpful accessibility statement • Easy to find contacts with good usability and best practice. • Can book assistance during the booking process • Freephone number for assistance	Page 30
Aer Lingus	7	⭐⭐⭐⯪ = 7	• Good WCAG compliance with an accurate helpful accessibility statement • Easy to find contacts with good usability and best practice • Can book assistance during the booking process • Costed number for assistance	Page 33
KLM	7	⭐⭐⯪ = 5	• Good WCAG compliance with a helpful accessibility statement • Easy to find contacts with some usability and best practice • Cannot book assistance during the booking journey • Freephone number for assistance	Page 36
Virgin Atlantic	8	⯪ = 1	• Good WCAG compliance but a poor accessibility statement • Difficult to find contacts • Cannot book assistance during the booking journey • Costed number for assistance	Page 39

hi

Overall High-Level Airline Website Accessibility Ranking (2)

Airline	WCAG (out of 10)	Digital Consumer Journey (out of 10) ⭐ = 2	Comments	Airline response (on page)
Logan Air	4	⯪ = 1	• Poor WCAG compliance with no accessibility statement • Easy to find contacts • Cannot book assistance during the booking journey • Costed number for assistance	[Page 42](#)
Wizz Air	2	⭐ = 2	• Poor WCAG compliance with no accessibility statement • Easy to find contacts and some usability and best practice • Cannot book assistance during the booking journey • Costed number for assistance	[Page 45](#)
Jet2	1	⭐ = 2	• Poor WCAG compliance with no accessibility statement • Easy to find contacts • Cannot book assistance during the booking journey • Freephone number for assistance	[Page 48](#)
Ryanair	1	⭐ = 2	• Poor WCAG compliance with no accessibility statement • Easy to find contacts and some usability and best practice • Can book assistance during the booking process • Costed number for assistance	[Page 51](#)
TUI	1	⭐ = 2	• Poor WCAG compliance with no accessibility statement • Easy to find contacts and some usability and best practice • Cannot to book assistance during the booking journey • Costed number for assistance	[Page 54](#)

5 Ways All Airlines Can Improve Their Accessibility

1 — **Consumer Research**: This will enable airlines to understand the diverse needs of individuals with access requirements, allowing for the creation of tailored design solutions and fostering empathy through a user-centred approach understanding accessibility is not a not a one-time achievement but a continuous journey.

2 — **Consider the Overall Consumer Journey**: This will ensure an inclusive experience for users, addressing access barriers at each stage within the user journey, not just in siloed parts such as the website or app. This will help provide an accessible experience overall, promoting a positive brand perception and fostering consumer loyalty.

3 — **Accessibility Statements**: Clear and accurate accessibility statements aid support and transparent communication, manage user expectations, and build trust and credibility with users, enabling them to make informed decisions and engage with airlines' digital platforms confidently.

4 — **Go beyond WCAG**: Features like text size and designing for users who are neurodiverse can greatly enhance the usability and inclusive nature of the web experience. Incorporating best practice and AAA parts of WCAG can also improve inclusion.

5 — **Guidance and Reassurance**: By providing guidance and reassurance for users on how their needs will be met, airlines empower them, reduce frustration, and build trust by providing the necessary information and support to navigate digital platforms with confidence and ease.

2. Targeted Technical Audits & Airline Scoring

hi

Overview & Audit Process

- To examine the digital accessibility of the airline's respective websites, **targeted technical audits** were undertaken.

- These were done through a process called "Live Audits" which take a **holistic approach to accessibility** and involves an expert going through key user journeys with the airlines remotely, which were recorded and shared with airlines.

- Working through the user journeys, barriers **that real users would face were demonstrated** then their priority and possible fixes were discussed together.

- The Live Audits identified issues in relation to the Web Content Accessibility Guidelines (WCAG) 2.1 AA, as well as areas in neurodiversity and digital inclusion.

- The issues identified were not exhaustive but instead focused on selected journeys and reviewed from a **high-level view.**

- The Live Audits enabled the airlines to understand and discuss the issues found, to **increase their understanding of accessibility** requirements, and to explore ways of implementing fixes. The Audits were undertaken in a constructive manner, and airlines were assured that the CAA's objective was not punitive.

- The key user journeys that the audits looked at included content such as:
  - Website home pages
  - Booking journey – including the ability to book services specific to passengers who need assistance at the airport or on the plane
  - Signposting and accessing essential passenger information
  - Information on passenger rights
  - Customer service / raising complaints

- Following the audits, we then scored the airlines on the accessibility of the chosen journeys from a WCAG perspective as well the holistic view to help produce a **high-level ranking**.

Important Notes:
- These audits were conducted between March and June 2023 so there may be differences to how the sites look now, as some airlines have made recent changes.
- The audits did not review all pages of the websites or the mobile apps so the accessibility may differ in these areas.
- For the scope of this project, the audits only reviewed the consumer journey up to the point of booking so did not include the management of booking.

Scoring Methodology - WCAG

WCAG 2.1 are the **internationally recognised guidelines** for developing accessible websites and applications. WCAG 2.1 AA is used around the world as a **baseline for measuring the accessibility** of digital content. As such, we wanted to incorporate this into the scoring of the airlines' websites.

- Up to **10 points were available** for airlines that demonstrated compliance with the success criteria in WCAG 2.1 AA.

- Through the audits, non-WCAG compliance issues were identified and then given a mark based on their priority to fix:
  - **High Priority** Issues (critical for completing the journey) = 3 marks
  - **Medium Priority** Issues (cause frustration but users can still complete a journey) = 2 marks
  - **Low Priority** Issues (cause minor confusion) = 1 mark

- The issues and their marks were then added together to form a total. For example: 1 High Priority issue and 2 Medium Priority issues = 7 total marks

- We then gave points out of the possible 10 using the categories below:
  - 0 to 20 marks = **10 points**
  - 21 to 30 marks = **9 points**
  - 31 to 40 marks = **8 points**
  - 41 to 50 marks = **7 points**
  - 51 to 60 marks = **6 points**
  - 61 to 70 marks = **5 points**
  - 71 to 80 marks = **4 points**
  - 81 to 90 marks = **3 points**
  - 91 to 100 marks = **2 points**
  - 101 to 110 marks = **1 point**

WCAG Score Boundaries:

- **Very Good** (9 to 10 points)
- **Good** (7 to 8 points)
- **Partial** (5 to 6 points)
- **Poor** (3 to 4 points)
- **Very Poor** (1 to 2 points)

- This meant that the airlines with the higher overall points had greater compliance with WCAG 2.1 AA compared to those who have less points.

- For clarity, this scoring approach is not related to the one proposed by the CAA in its **Airline Accessibility Framework.**

WCAG Airline Website Accessibility Ranking

Airline	WCAG Score (out of 10)
British Airways	9
Virgin Atlantic	8
Emirates	8
EasyJet	7
Aer Lingus	7
KLM	7
Logan Air	4
Wizz Air	2
Jet2	1
Ryanair	1
TUI	1

- Each of the airline's sites were checked against WCAG 2.1 AA principles of: Perceivable, Operable, Understandable, and Robust.

- A high-level WCAG score was then given to each of the airlines based on the number of barriers that were experienced during the audit of the chosen user journeys as well as their priority.

- Common barriers experienced were:
  - Lack of keyboard accessibility and keyboard focus.
  - Inconsistent markup of headings for screen reader users.
  - Buttons and other controls not being labelled accurately.
  - Poor accessibility of hosted or 3rd party content.
  - Instances of poor colour contrast for text and non-text.

- Whilst this does provide an initial ranking as to the accessibility of the airline websites as it relates to WCAG, it is specific to the key user journeys selected.

- For a more detailed compliance score, we would encourage the airlines to complete an audit across the entire site to identify all of their WCAG barriers.

WCAG Score Boundaries:
- **Very Good** (9 to 10 points)
- **Good** (7 to 8 points)
- **Partial** (5 to 6 points)
- **Poor** (3 to 4 points)
- **Very Poor** (1 to 2 points)

Scoring Methodology – Digital Consumer Journey

- Whilst the WCAG 2.1 AA guidelines provide a great baseline for measuring accessibility, we wanted to go further to review the **digital consumer journey** from entering the site, all the way to booking.

- This means looking at the different **consumer touchpoints** that a user with access needs might encounter. Whether that is searching for **customer service numbers** or looking at the **accessibility statement** to find information on what parts of the site may have barriers.

- We know that some organisations implement features on their websites which might not be covered under the WCAG guidelines but nevertheless still **enhance the consumer experience** for people with access needs.

- An **additional 10 points were on offer** for airlines that had given thought to accessibility across the digital consumer journey and went further than just WCAG 2.1 AA.

> **Important Note:**
> The points awarded for the consumer journey were developed based on comments from consumers given during the feedback sessions on what they want when it comes to accessibility, rather than any particular guideline or regulation.

The remaining 10 points were awarded to:

- **Accessibility of Consumer Touch Points** (4 points)
  - 1 point for the ability to book assistance during the booking journey
  - 1 point for providing a free of cost assistance phone number
  - 1 point for providing a general customer service number available that is easy to find (1 to 2 clicks from the home page)
  - 1 point for ensuring documentation (e.g. PDFs) is accessible

- **Accessibility Statements** (3 points)
  - 1 point for having an accessibility statement
  - 1 point for the accuracy of the statement
  - 1 point for providing additional contact information so people can feed back about accessibility or get further help

- **Usability & Inclusion** (3 points)
  - 1 point for compliance with non-WCAG usability considerations e.g. text size
  - 1 point for WCAG 2.1 AAA success criteria compliance e.g. screen timeout awareness
  - 1 point for adherence to industry best practice for usability & digital inclusion e.g. neurodiversity

Digital Consumer Journey Accessibility Ranking

Airline	Overall	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
British Airways	⭐⭐⭐⭐ = 7	2	3	2
EasyJet	⭐⭐⭐⭐ = 7	3	2	3
Aer Lingus	⭐⭐⭐⭐ = 7	2	3	2
Emirates	⭐⭐⭐ = 6	1	3	2
KLM	⭐⭐⭐ = 5	2	2	1
Wizz Air	⭐ = 2	1	0	1
Jet2	⭐ = 2	2	0	0
Ryanair	⭐ = 2	2	0	0
TUI	⭐ = 2	1	0	1
Virgin Atlantic	⭐ = 1	0	1	0
Logan Air	⭐ = 1	1	0	0

- The digital consumer journey was scored as well to show that whilst an airline can be WCAG compliant, usability, digital inclusion and non-WCAG issues are also a key factors for customers.

- One example is: the importance of providing clear methods for contacting airlines – specifically phone numbers – which users in the consumer feedback session identified as critical to their journey.

- For customers to have a fully inclusive experience additional consumer touchpoints such as emails, phone lines, web chat, and PDFs all need to be accessible as well.

- These scores represent a high-level view of what airlines are doing in respect of key aspects of the digital consumer journey beyond WCAG compliance to make the booking experience easier for all of their consumers.

- However, it should be noted that this is not exhaustive and there are other features beyond these which can contribute to the consumer journey too.

What drove accessibility scores down? (1)

- Our analysis reveals **significant accessibility challenges** in some of the airlines' journeys. Common issues observed include a lack of consideration for keyboard users: [W3C Perspective Video - Keyboard Compatibility](#)

- As well as this, buttons and links were frequently found to be inaccurately labelled, causing confusion and hindering user comprehension: [W3C Perspective Video - Speech to Text](#)

- Airlines **often neglected to consider the end-to-end consumer journey** when addressing accessibility, focusing on isolated areas rather than taking a holistic approach that recognises accessibility as an integral aspect of the overall consumer experience

- Some of our findings show a **lack of user research or awareness of how individuals make reasonable adjustments or use assistive technology**. There are often multiple ways to implement accessibility and often the solution applied hadn't been fully tested: [Gov.UK - Making your service accessible: an introduction](#)

Quotes from Consumer Feedback Sessions

> "The main challenge that I had on the different websites was the lack of digital accessibility."

> "I'm not booking with you if I don't know **at the beginning** what special assistance might be available"

What drove accessibility scores down? (2)

- Some airlines lack **clear processes or mechanisms for users to contact the organisation**, provide feedback on accessibility issues or get the support they need through the user journey. The consumer feedback sessions identified how this is critical to some users as it provides reassurance and an alternative method of completing the user journey.

- **WCAG 2.1 AA compliance is a useful starting point but does not fully include guidelines** for those who are less IT literate, have neurodiverse issues or who are less confident/experienced in using technology. Some components are complex to interact with and lack instructions and guidance, which increases the risk of digital exclusion.

- **Accessibility statements range from very good to non-existent**. Consumers who need support often check these for help and contacts to guide them through the digital experience. Where an issue is still being resolved they can be helpful in providing alternative methods of achieving the same end goal. Omitting statements can be problematic for users and possibly reputationally damaging as airlines can be seen as less transparent, as highlighted by some users in the consumer feedback sessions.

- **Often airlines have not assessed the accessibility of third-party content** before or after implementation, placing themselves at risk as they are ultimately responsible for hosting inaccessible content. If that third-party content is critical to the user journey, then many users may fail to complete their desired action.

Quotes from Consumer Feedback Sessions

> "I found none of the websites had easy routes if you wanted to make a complaint"

> "the booking fails ...because you've got a plug-in from an external place and that plug-in isn't accessible."

Individual Airlines Executive Summaries, Scores & How to Improve

- The following slides provide, for each airline:
  - an **executive summary**
  - The **separate scores achieved** for **WCAG compliance** and the **digital consumer journey**.

- The summary also includes **actionable recommendations on how each airline can further improve their digital accessibility offering**, addressing areas where enhancements can be made in both **WCAG compliance** and the **digital consumer journey**.

- Additionally, it includes each airline's response, to the scores and recommended improvements, allowing them to share their perspective and plans for addressing the identified findings.

Important Note:
Whilst each site is unique, some of the issues and improvements will overlap between airlines as they require enhancement in similar areas. Whilst they may repeat, we feel it is important to highlight these for each airline for the purpose of transparency, fairness and due process

Airline	Pages
British Airways	Pages 22 to 24
Emirates	Pages 25 to 27
EasyJet	Pages 28 to 30
Aer Lingus	Pages 31 to 33
KLM	Pages 34 to 36
Virgin Atlantic	Pages 37 to 39
Logan Air	Pages 40 to 42
Wizz Air	Pages 43 to 45
Jet2	Pages 46 to 48
Ryanair	Pages 49 to 51
TUI	Pages 52 to 54

British Airways Executive Summary

- British Airways show a **very good level of accessibility with WCAG and additional best practice**. Keyboard accessibility, focus, labelling, and responsive design all help users navigate and interact with the site with minimal barriers.

- A **lot of thought has gone into accessibility with colour contrast, status messages, and structure all working well** for several user groups.

- Some **minor inconsistencies on pages don't provide context to all users** depending how they navigate but **a detailed accessibility statement gives additional support, signposting and contact mechanisms for users looking to get in touch**.

- However, **customers are not able to book assistance during the digital journey and need to do this separately which is a key are to improve**. It isn't clear how this affects seating arrangements and potential refunds at present so users may become anxious or confused. Calls to the assistance number are free and detailed information is given on potential scenarios and conditions.

Number of British Airways WCAG Priority Issues

High: 1
Medium: 5
Low: 13
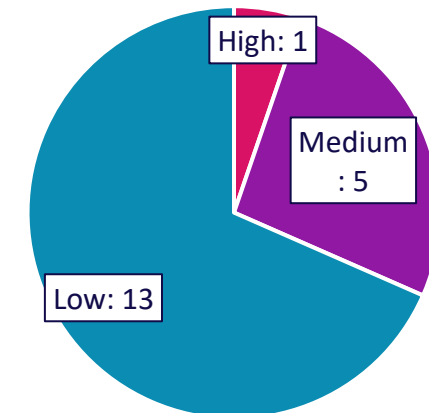
British Airways Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
British Airways	9	2	3	2

WCAG – What could be improved:

- **Ensure all interactive components can be accessed using different inputs** – e.g. Keyboard, voice, mouse, and touch.

- **Ensure that keyboard focus follows a logical order** for all users, especially when opening new pages or controls.

- **Ensure accurate alt text** against all non-text content.

Digital Consumer Journey – What could be improved:

- British Airways should **consider allowing users to book assistance during the flight booking process** so that it simplifies the experience and reassures them that their needs have been considered .

- **Further testing on the end-to-end journey** should be undertaken to ensure all customer touch points are accessible – e.g. 3rd party content hosted by them.

- **Move beyond WCAG AA compliance** to further their inclusion for more diverse user groups as they are already meeting the basics.
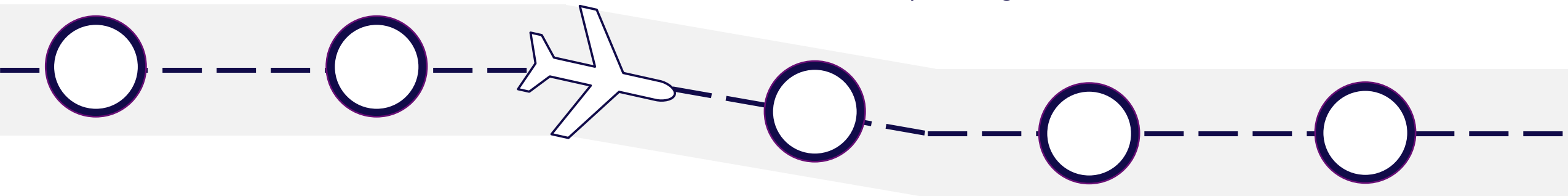
British Airways Response to the Findings

- We believe our unique British Airways service should be accessible to everyone, and we're pleased to be ranked as offering a "very good" level of accessibility against WCAG guidelines, with some areas described as "best practice."

- We're proud that more than half a million customers who require additional assistance travel with us each year and we have a specialist accessibility team to provide support to them throughout their journeys.

- We've already made good progress in improving the accessibility of our digital platforms and we fully recognise that there is more to be done. We're continuing to invest in this and are currently in the midst of a significant programme of updates to our platforms, which will benefit all of our customers. Our approach is to now embed accessibility in everything we do and build it strategically into our digital channels in a way that is customer focused.

- We are taking on board all the feedback provided and are incorporating it into our roadmap of improvements.

Emirates Executive Summary

- Emirates website journeys show **a good overall level of accessibility with WCAG and some additional best practice**. The site responds well to reasonable adjustments, has a good structure and colour contrast.

- It is clear that **a lot of thought has gone into accessibility** with bypass links, good labelling and some additional non-WCAG areas considered.

- Unfortunately, some **issues with navigation and inconsistencies between pages** make understanding and perception harder for users. **Third party content hosted by the site has accessibility issues** affecting the overall user journey. Some low priority issues compound over longer journeys, which may affect how easily some users can book.

- Customers are **not able to book assistance during the digital journey and need to do this separately**. It isn't clear how this affects seating arrangements and potential refunds at present. Calls to the assistance number are costed.

Number of Emirates WCAG Priority Issues

High: 5
Medium: 5
Low: 15
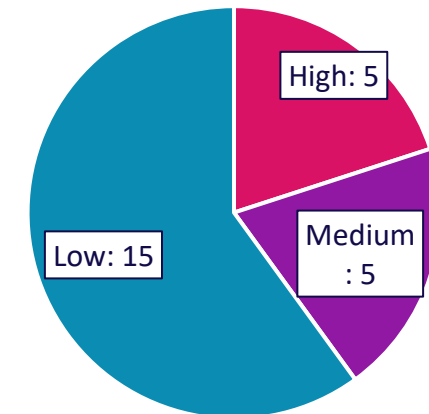
Emirates Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Emirates	8	2	3	2

WCAG – What could be improved:

- **Ensure keyboard accessibility and consistent navigation** across all pages so users don't get confused moving to different areas.

- **Ensure that keyboard focus is controlled** so users are moved to new content and menus.

- **Ensure that content and components are arranged in a logical manner,** so readout makes sense to people using a screen reader.

- When creating bespoke **components ensure that these work with different inputs and technology.**

Digital Consumer Journey – What could be improved:

- Enable users to **book assistance for their specific needs during the booking process rather than after** so that it reduces any anxiety users may have of their needs not being supported once they have paid.

- Consider adding in **a "free" assistance phone line** to be more inclusive of those who require additional support and have less disposable income.

- **Check the accessibility of hosted content** that may be included in the user journey.

Emirates Response to the Findings

- Emirates welcomes the insights provided by this audit, which reaffirms our aim to maintain an inclusive and accessible digital experience for all our customers.

- As an organization, our goal is to be equitable by design and accessible by default. We strive to achieve this by continuously auditing our experiences, and ensuring that we take informed actions and include accessibility considerations in every part of our customer journey.

- We accept the findings laid out in this report and we are taking steps to help ensure consistent adherence to WCAG 2.1 AA standards. Our teams are currently in the process of redesigning core experiences, including many of those raised in this audit, to enhance the usability and accessibility compliance of our digital experience.

- We would like to thank Hassell Inclusion, stewarded by the CAA, for their insights and we would like to extend a special thanks to the participants who volunteered their time in the Speed Dates, candidly sharing their learned experiences with us.

EasyJet Executive Summary

- EasyJet website journeys show **a very good overall level of accessibility with WCAG and some additional best practice**. The site responds well to reasonable adjustments, keyboard accessibility and has good structure.

- We can see that **a lot of thought has gone into accessibility** with bypass links, good labelling and additional context for screen readers users being added to the site. However, sometimes this isn't included for other users.

- Unfortunately, across the site there are **several colour contrast issues which affect perception and understanding**.

- Additional **inconsistencies in the booking journey aren't accurately reflected in the accessibility statement which has not been updated in approximately 1 year.**

- **Customers do have the convenience of booking assistance directly during their digital journey, ensuring a seamless experience**.

- Additionally, **the provision of free phone numbers for additional help demonstrates a commitment to digital inclusion**.

Number of EasyJet WCAG Priority Issues

High: 4
Medium: 5
Low: 20
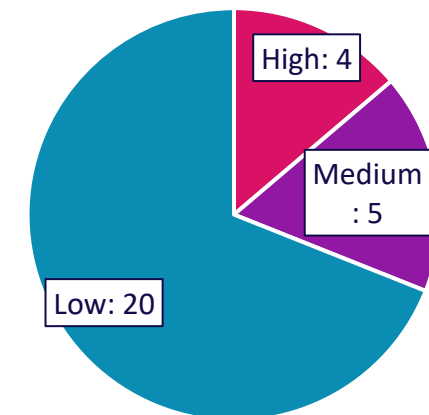
EasyJet Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
EasyJet	7	3	2	2

WCAG – What could be improved:

- **Colour contrast of main branding and similar colours needs to be improved** across the site.

- Populating pages with **content from other sites** needs to be checked.

- **The logical order of the keyboard focus should also be reviewed** to ensure that content is presented in a way which is consistent with the desired action of the page.

- **Tables need to be appropriately marked up with headings** to aid screen reader users in understanding the content.

- **Ensure that items such as the cookie banner can be controlled** and dismissed using the keyboard.

Digital Consumer Journey – What could be improved:

- EasyJet should consider **updating their accessibility statement with additional information** as it does not include some of the inconsistencies that occur in the booking process.

- Going beyond WCAG into features such as **having a minimum text size** would enhance some users' experience when booking through their website.

- **Review the accessibility of content hosted from 3rd parties** to ensure it delivers on the same accessibility levels that EasyJet strive for.

EasyJet Response to the Findings

- Making travel accessible is a focus for easyJet and we welcome feedback and insight as it helps us to make further improvements, and we continue to work on ensuring our website and app make booking flights and holidays easy for everyone.

- Following the assessment, we have already made changes to our keyboard focus and cookie banner, and have started work to update the accessibility statement and implement a minimum text size.

- We are keen to continue working with Hassell Inclusion to identify the tables referenced with the view to making the recommended improvements.

- Over the next year we are rebuilding our digital platforms through which we will review the recommendations to further improve the overall digital customer experience, including reviewing how third party content is provided on our page and making finding useful information and requesting assistance even easier.

- While our brand colours are licenced and therefore cannot be changed, we will continue to explore whether there are any alternative options to improve accessibility in this space

Aer Lingus Executive Summary

- Aer Lingus' website shows a **good level of accessibility against WCAG** including good keyboard accessibility, focus, responsive design and contrast. The assistance section has good, easy to find information

- **A lot of thought has gone into accessibility** which helps users navigate and interact with the site. Further improvements for keyboard navigation, context and labelling will help make the site more inclusive but **there are minimal issues**

- **The accessibility statement gives useful information and additional contact information**.

- **The assistance pages give numerous ways for customers to contact the organisation** and although the phone number is costed **the time period this is available for is longer than other organisations.**

- **Special assistance can be added during the booking journey and links provide additional support to users about this**.

Number of Aer Lingus WCAG Priority Issues

High: 3
Medium: 9
Low: 23
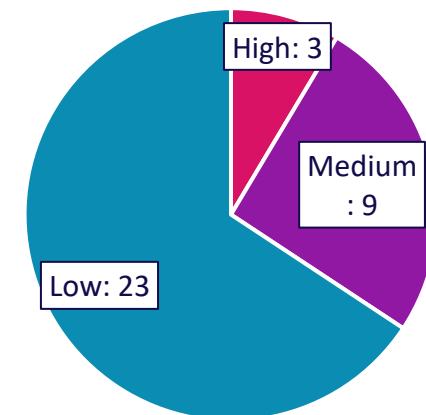
Aer Lingus Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Aer Lingus	7	2	3	2

WCAG – What could be improved:

- **Ensure that any restrictions provided to visual users (such as greyed out dates) are equally instructed to screen reader users** so that they do not select elements which are not available.

- **For any menu navigation, ensure that keyboard users are able to fully access all elements** including sub menus.

- When using any type of forms or data input, **ensure that fields are accurately labelled** so that screen reader users understand what information is required from them.

- For any **error messages that occur, make sure that these are read out to screen readers** so that they aware of what is stopping them from moving forward on their journey.

Digital Consumer Journey – What could be improved:

- **Providing free of cost assistance numbers** can improve the digital inclusion of the site by ensuring those who have additional needs, but a lower disposable income, are not disadvantaged when contacting about support.

- Once WCAG basics have been implemented, Aer Lingus should **consider AAA success criteria** to further enhance the inclusivity of their site.

Aer Lingus Response to the Findings

- Accessibility has been central to the Aer Lingus web experience for several years, and is an integral component of our ongoing digital transformation. It is a core to our product development process, from design through to production. This ensures continued improvement and adherence to industry standards, and that customer needs are held to our high standards.

- We will review all the findings of the report and where applicable, build improvements into our delivery roadmap over the coming weeks and months. We will also continue our ongoing commitment and adherence to industry usability & digital inclusion best practice.

- As part of further enhancing Inclusivity across our website we will also be review the viability of WCAG 2.1 AAA conformance.

KLM Executive Summary

- KLM website journeys show **good accessibility, a clear structured layout and a good responsive design** to user reasonable adjustments. **Labelling, keyboard accessibility, and good WCAG compliance** help provide inclusive navigation and interaction for most users.

- Across the site **information is easy to find, an accessibility statement gives users further information on how the website may or may not support their needs, and a contact number specifically for booking assistive travel**.

- Some **inconsistencies and lower priority WCAG issues unfortunately add minor barriers to users and over longer journeys these may potentially cause issues.** However, alternative help is available via several channels including non-costed options. Some **issues with colour contrast** are also apparent.

- **Assistance cannot be chosen during the booking process** but information about this service is readily available and a freephone number is provided, alongside other options, for people to use this service.

Number of KLM WCAG Priority Issues

High: 3

Medium: 7

Low: 25
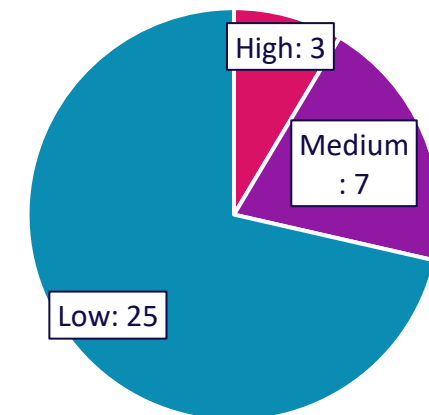
KLM Scores &
How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
KLM	7	2	2	1

WCAG – What could be improved:

- **Keyboard focus order should be reviewed to ensure logical content navigation**, for example having focus go to available seats automatically after selection.

- **Key elements of the booking process need to be made accessible via a keyboard**, such as the seat selection dialogue.

- When a user interacts with any element, **ensure screen reader users are updated on what has happened on the screen** e.g. collapsed and expanded menus.

- For any error messages that occur, **make sure that these are read out to screen readers** so that they aware of what is stopping them from moving forward on their journey.

Digital Consumer Journey – What could be improved:

- By **providing the opportunity for users to book required assistance during the booking process**, KLM can reduce anxiety and reassure users that their needs can be met before completing the transaction.

- **Ensuring the accessibility statement is accurate** would help support users identify potential barriers and possible workarounds.

- Building on their good initial WCAG 2.1 AA compliance, **KLM should consider implementing AAA features** to further enhance the inclusiveness of their site.

KLM Response to the Findings

- A new version of the seatmap was released, which solved some issues (keyboard accessibility is improved on Chrome), however there are outstanding issues in other browsers. The developers are working on fixing these.

- Focus states are currently being redesigned, and the improvements are expected to be released in Q4. Likewise, contrast issues are resolved, the website will be updated and the contrast switch removed.

- Live regions will be improved. Accessibility training is currently happening throughout the digital department, and arialive guidance is a topic for development.

- Form improvements have been logged, and will be prioritised in the components library first, this is to prevent errors from being announced prior to input.

- Team in charge of the booking flow have been made aware of the recommendation to add assistance throughout the booking flow.

- Accessibility statement is up-to-date, accurate, and has a dedicated inbox. We are looking to improve by adding a 'Known issues' section, but the criteria seems to be met.

- We are currently training design, development, content, testers and are committed to improving our digital products and to meet, or exceed, WCAG AA 2.1. External trainers are currently running sessions, which will continue throughout this year.

Virgin Atlantic Executive Summary

- Virgin Atlantic website journeys show a **good level of accessibility and responsive design.** Generally, keyboard accessibility, focus and colour contrast are compliant with appropriate labelling used in most cases.

- The site **demonstrates some good accessibility and usability features** but unfortunately is **inconsistent on individual pages and across the site in their implementation**. There are minimal high priority issues, but **the accumulation of several low issues makes navigation and interaction harder for users**, especially those using assistive technology.

- **An accessibility statement is available** on the site, but **this doesn't give enough information to inform users on what parts of the site may not support their needs or provide contacts for users who are having difficulties**.

- **Users are not able to book assistance during the online journey and may need to contact a separate team for this**. Although good information is given on help provided it can be difficult to identify key contacts and processes for this from the website.

Number of Virgin Atlantic WCAG Priority Issues

High: 2
Medium: 5
Low: 17
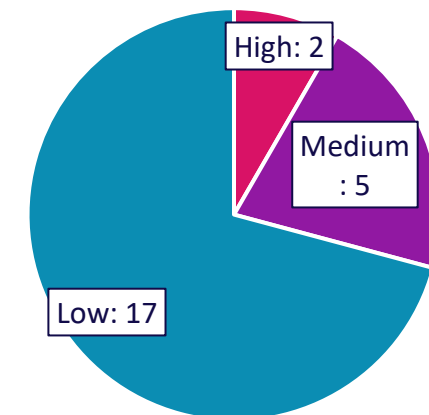
Virgin Atlantic Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Virgin Atlantic	8	0	1	0

WCAG – What could be improved:

- Ensure all components in a user journey **can be navigated to and operated using a keyboard.**

- **Ensure that links are descriptive and identify destination and context** for all users if possible.

- **Ensure that icons have descriptive names**, including social media.

- **Provide bypass links** to help keyboard users jump past repeated navigation elements.

Digital Consumer Journey – What could be improved:

- Virgin Atlantic should consider various elements across consumer touch points to enhance the experience including:
  - **Providing the ability to book assistance during the booking process.**
  - **Implementing easy to find contact numbers that are cost-free** so do not disadvantage users with lower disposable incomes.

- **Providing an accurate and supportive accessibility statement** to help users identify possible workarounds would improve the consumer journey. **The statement should also provide contacts for users** to raise issues or get support as needed.

- Looking to meet WCAG 2.1 AAA success criteria along with **implementing industry best practices on elements such as user guidance and affordance on information** would also be helpful to the consumer journey.

Virgin Atlantic Response to the Findings

At Virgin Atlantic we firmly believe that everyone can take on the world and want all our customers to enjoy a seamless and inclusive experience at every stage of their journey, delivered by our people.

We welcome the CAA's digital accessibility audit and the recognition of our strong performance within the Web Content Accessibility Guidelines (WCAG). In addition, we are working closely with the accessibility community to deliver a comprehensive Customer Accessibility Plan. This includes a large-scale transformation programme underway to make improvements to our digital experience and further invest in our customer care provision. These ongoing projects will address many of the accessibility opportunities found in the audit and ensure we can continue delivering an inclusive user experience.

Additional information:

- The report identifies recommended improvements in the consumer journey and accessibility statement. Regarding these points raised:
  - Special Assistance options are signposted across the website and in the booking confirmation email. We have a dedicated pre-travel assistance team and ask customers to complete an online web form or email us at least 72 hours before departure. We then proactively call the customer to discuss their travel requirements in more detail and ensure provision is in place, working with airport partners where required.
  - With regards to the Accessibility statement, since the audit, we have updated the statement with essential information, including contact details for Special Assistance.

- We will continue to abide by best practice and work toward WCAG 2.1 AAA standards.

Logan Air Executive Summary

- Logan Air website journeys show **a good structure which responds well to reasonable adjustment**s. The **help centre gives good information, with multiple contact options** enabling users to get in touch using the method that works best for them and their needs.

- **Keyboard accessibility is good in parts of the site.** But unfortunately, inconsistencies across pages mean that **in some critical areas keyboard users cannot access important content and are prevented from progressing** with their activities.

- **Labelling issues across the site prevent assistive software users from being able to navigate and interact with the site** as well as making journeys longer and more time-consuming for those who are sighted users.

- **No accessibility statement is available** to help users identify issues or find alternative ways in which they can reach the desired end goal.

- **Customers do have an option to book assistance during the digital journey.** However, this is done via a separate form and may be confusing to users in the overall journey process.

Number of Logan Air WCAG Priority Issues

High: 13
Low: 15
Medium: 13
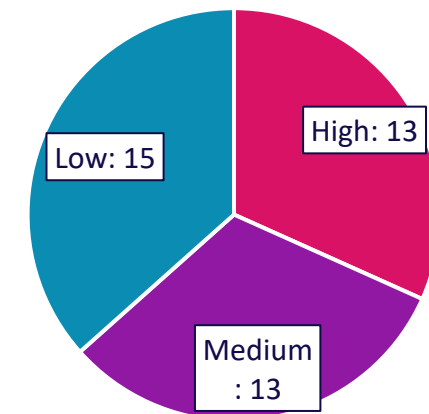
Logan Air Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Logan Air	4	1	0	0

WCAG – What could be improved:

- For any element that has **information available on hover** the same behaviour should be available for other inputs methods.

- **Colour contrast for text needs to meet minimum requirements** to aid users with visual impairments.

- Any **status messages that appear on screen (such as payment confirmation or decline) need to be read out to screen readers**.

- The use of **bypass/skip content links** should be included to help keyboard users.

- **Checkboxes and buttons for critical information (such as terms and conditions) need to be labelled properly** so assistive technology users can identify and perceive these.

Digital Consumer Journey – What could be improved:

- **Providing easy access assistance numbers and incorporating this into the flight booking process** would enhance the experience for users with additional needs providing them with reassurance as they achieve their desired actions.

- **An accessibility statement that is accurate, supportive, and gives contact details** would provide transparency for users on where the site may not meet their needs and how they can contact Logan Air if they need additional support.

- **Logan Air could consider guidelines beyond WCAG 2.1 AA**, such as implementing minimum text sizes and using industry best practice in areas like neurodiversity would further improve the consumer journey overall.

Logan Air Response to the Findings

- We welcome the positive feedback that our website structure overall responds well and that our customer help centre offers customers a variety of ways to get in touch based upon their individual needs. Loganair was disappointed, however, to learn of the score on web accessibility after a recent audit. We have since taken steps to ensure that gaps highlighted will be closed within the next six months.

- Loganair is an airline open to all and, since the audit, we have undertaken a review and will be implementing improvements across our website for customers with specific accessibility needs. Website enhancements are underway to address key priority areas over the coming weeks and a new accessibility statement will be implemented by the end of July.

- Loganair is fully committed to offering the best possible booking experience equally and for all, and takes its responsibility in this area very seriously. We welcome the report's findings, in particular on the way customers book special assistance during the digital journey and this is something Loganair has already identified as an area for improvement over the summer period.

Wizz Air Executive Summary

- Wizz Air website shows some **compliance with WCAG and a responsive design to reasonable adjustments.** However, **overall the journeys demonstrate a poor level of accessibility.**

- **The special assistance call centre is open 24 hours** and associated pages give information on options available. Unfortunately, **the information can be hard to find** and due to the number of accessibility issues some users may not be able to access this content.

- **No accessibility statement is available** so some users may have difficulty in completing journeys, finding alternative methods for completing actions or raising issues detailing how the site does not support them.

- As well as this, **assistance cannot be added to the booking journey** and must booked separately through a costed call to the helpdesk which may cause users anxiety during the journey.

Number of Wizz Air WCAG Priority Issues

Low: 12
High: 17
Medium: 18
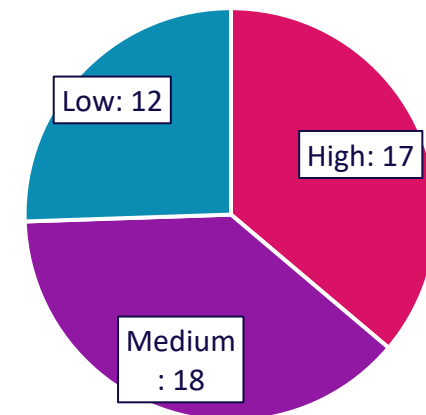
Wizz Air Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Wizz Air	1	1	0	1

WCAG – What could be improved:

- **Any use of animation on the site needs to include controls so that users can pause the content** and read through at their own pace.

- Ensure all areas of the site can be **navigated to and interacted with using the keyboard.**

- Ensure keyboard focus is **clearly** shown on interactive component of the site so users can identify location.

- **Warn users and give options about timeouts** so data isn't lost during the booking process.

- **All interactive components should have clear labels** so users can identify and understand the interaction/destination upon their selection.

- **Ensure that clear guidance is given when user input is needed,** and this is communicated both visually and to assistive technology.

Digital Consumer Journey – What could be improved:

- **For users with additional needs Wizz Air should look to integrate the booking of assistance and assistance numbers within the booking process** so that consumers can easily get the support they need at the point that they need it.

- **An accurate and supportive accessibility statement would increase transparency with users** and help open a point of two-way communication. Wizz Air can do this by ensuring the statement:
  - Is up-to-date
  - Is assistive in providing workarounds for current site issues
  - Provides contact mechanisms to gain further support or raise issues

- **Looking into industry best practice on areas such as information affordance, neurodiversity and the opening of new windows** would allow Wizz Air to further enhance the accessibility of the consumer journey.

Wizz Air Response to the Findings

- Let us thank you for the time and energy you have invested in this research. Wizz Air is well aware of the importance of accessibility, and we are already taking actions on how to improve our website & application.

- This research gave Wizz Air new perspectives on how to approach the topic of accessibility, hence a unified view is emerging on how wizzair.com and WIZZ mobile app can be effectively developed and operating with innovative and forward-looking solutions.

Jet2 Executive Summary

- Jet2 website journeys implement **some positive elements towards accessibility through the site**. The site responds well to reasonable adjustments and the **assistance pages show a good range of contact options**. **However, overall the journeys have a poor level of accessibility.**

- **Some keyboard functionality and focus is used well** across the journeys but **unfortunately this is inconsistent leading to a poor basic level of accessibility**. Throughout the pages there are high priority issues where **keyboard users cannot access critical content in order to complete their journeys**.

- **No accessibility statement is given on the site** so users experiencing access issues do not have guidance on alternative channels to use. However, **there are several contact numbers that are given which may provide reasonable adjustments to users requiring additional support**.

- **Assistance cannot be added during the booking process but a freephone number is available for special assistance** allowing users get more information and help at no extra cost to themselves.

Number of Jet2 WCAG Priority Issues

Low: 16

High: 21

Medium : 11
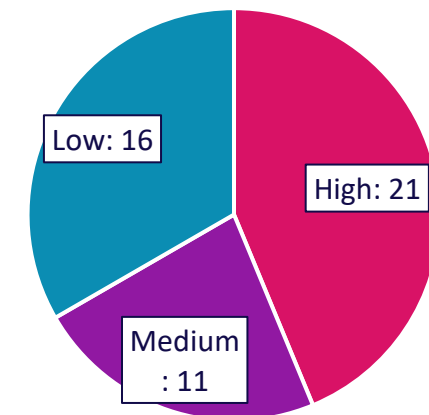
Jet2 Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Jet2	1	2	0	0

WCAG – What could be improved:

- **Colour contrast for text needs to meet minimum requirements** across all areas of the site.

- **Key elements of the journey need to be accessible via a keyboard** to enable mobility impaired users to progress on their journey.

- **Provide bypass/skip content links on pages** so that the number of tab stops are reduced, and users do not have to repeat navigation elements.

- **Ensure that all key elements are part of the keyboard focus order** so that users are not restricted on their journey.

- **All combo boxes, form fields and buttons need to be labelled accurately and distinctively** so users understand their purpose and the action required from them.

- **Any changes in content on screen need to be read out to screen reader users** so they are aware of what is happening.

Digital Consumer Journey – What could be improved:

- **Booking assistance for users with additional needs should be integrated as part of the booking process** so that it provides a seamless experience without causing anxiety for consumers about whether the needs will be met after purchase.

- **An accessibility statement is needed to provide transparency** on where the site does not meet users needs. The statement should:
  - Be accurate e.g. up-to-date
  - Be supportive e.g. provide workarounds and alternative pathways
  - Provide contact details for users to contact for additional support e.g. email address or phone number

- **Consideration of usability & inclusion features and industry best practice** regarding support guidance would further improve the consumer journey.

Jet2 Response to the Findings

- In line with our industry-leading approach to customer service, we constantly assess, test and design our websites to improve them for every single customer, and accessibility standards are a critical part of that. All feedback is very important to us, and we are grateful for the feedback that this audit has provided.

- Although the audit recognises the positive elements towards accessibility on our website, we recognise that there is still work to do and we have a plan in place to address the issues that have been identified. In the meantime, we make it very clear in our accessibility statement that any customer can contact us free of charge via our UK based contact centre or via WhatsApp.

hi

Ryanair Executive Summary

- Ryanair website journeys shows a **good layout and structure** with **very good content in the assistance section** and **the ability to book assistance during the journey** and **chat with someone at no cost**.

- Unfortunately, **several high priority failures against WCAG leads to poor accessibility and barriers for several user groups make navigation and interaction very hard**. Inconsistencies across pages and fails in reasonable adjustments create barriers for both disabled and non-disabled users.

- The site has **no accessibility statement** which reduces transparency for users with additional needs on what areas of the site may not work for them and general enquiry calls are costed if a customer needed extra help to book a flight.

- **Customers are able to book assistance during the journey and this section has good information and structure but isn't as accessible as it could be** preventing some users from accessing it

Number of Ryanair WCAG Priority Issues

Low: 14
High: 20
Medium: 16
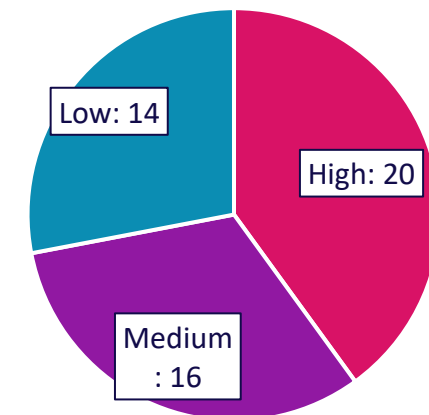
Ryanair Scores & How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
Ryanair	1	2	0	0

WCAG – What could be improved:

- **Keyboard accessibility needs to be improved throughout the booking process** to ensure users can interact with all key elements.

- **Bypass/skip content links should be added to pages** to help users jump past repeated navigations and reduce the tab stops on the journey.

- **Colour contrast of key text needs to meet minimum requirements** to help users with visual impairments distinguish content more easily.

- **Buttons need to be labelled so that screen reader users know what they are selecting** and voice recognition users are able to interact with them using their software.

- **When error messages occur, they should consistently provide information** on what the error is, where the user went wrong and how they can resolve this.

Digital Consumer Journey – What could be improved:

- Ryanair could **consider making their assistance numbers free of charge** to be more inclusive of users who require additional support and also have a lower disposable income.

- **Implementation of an accurate accessibility statement that is up-to-date** and **provide users with support** regarding workarounds for any issues would improve the consumer journey.

- The **statement should also include contacts** for users to get in touch if they experience any issues or need support.

- **Including additional usability and best practice** into the site would help this be more inclusive.

Ryanair Response to the Findings

- We have carefully evaluated the enclosed information. We would like to ensure that it is vital for us as Ryanair to keep our contact engaged for the long term, and smooth communication with our customers constitutes one of our priorities.

- We acknowledge the score we have been awarded as of today. We are fully engaged in improving on meeting the requirements on the Web Content Accessibility Guidelines, in order to make Ryanair's web content more accessible to people with disabilities. We are convinced this will result in eliminating barriers for all user groups, and eventually let us achieve higher scores.

- We are working on improving our systems' functionalities which will allow customers to follow an accurate digital consumer journey, without having to contact Ryanair Customer Service. Due to short notice and the complexity of these processes, we will need some time to make sure the changes are implemented correctly, before making people aware of them.

- Ryanair remains committed to supporting its customers in obtaining the required assistance, and providing high quality accessibility via an improved navigation and interaction process. In the view of reaching such results, we will be putting in place a Team, which will include both Customer Service and IT, who will dedicate their time in implementing the changes required.

TUI Executive Summary

- TUI's website has **some good accessibility features** including:
  responsive design and a good structure, additional extras such as a video for assistance, and an award-winning help-desk.

- Unfortunately, the **presence of several key WCAG failings deliver poor accessibility throughout the journeys creating barriers for various user groups**, hindering their ability to navigate and interact with the website effectively.

- The **absence of an accessibility statement** on the site poses challenges for users who require additional support. Without clear information about the nature of the site's known accessibility issues and how to seek further assistance, users may face difficulties in understanding and resolving their accessibility-related concerns.

- Customers are **not able to book assistance during the digital journey and need to do this separately.** Although the helpline is prominently displayed it isn't clear how this affects seating arrangements and potential refunds at present. Calls to the assistance number are costed.

Number of TUI WCAG Priority Issues

High: 17
Low: 22
Medium: 17
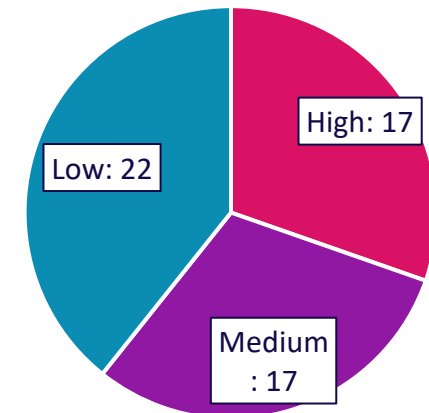
TUI Scores
& How to Improve

Airline	WCAG (out of 10)	Consumer Touchpoints (out of 4)	Accessibility Statement (out of 3)	Usability & Inclusion (out of 3)
TUI	1	1	0	0

WCAG – What could be improved:

- **Key elements of the site – such as seat selection and departure airports – need to be made accessible via a keyboard** for users with motor impairments.

- **Status messages or promotional opportunities need to be interactable by assistive technology** otherwise they cannot be dismissed and overlap key content.

- **Colour contrast of text must meet the minimum requirements** across the site.

- **Bypass/skip content links must be provided** to help users jump past repeated navigations and reduce the tab stops on the journey.

- **Ensure that aria labelling is used correctly** so that screen reader users are given accurate and appropriate information.

- **Ensure that any changes in content on the screen are read out to screen readers** e.g. expanded and collapsed menus.

Digital Consumer Journey – What could be improved:

- **Enabling users to book assistance during the booking process would enhance the consumer journey** for users as they will have the confidence of knowing the airline can support their needs.

- Accessibility statements are a key way in which the consumer journey can be enhanced. However, the **statement needs to be accurate and up-to-date** so it is still relevant. It also needs to **provide contacts** if users want to raise issues and **provide support in how they can navigate around the current issues.**

- **Implementing usability and inclusion features** (such as neurodiverse content) would help improve the inclusivity of the site.

TUI Response to the Findings

- TUI is committed to providing accessible experiences for all customers. We are constantly identifying and addressing gaps and limitations in our websites. Working towards WCAG 2.1 level AA compliance, focusing on the core user journeys.

- Over 18 months we have trained and supported teams to deliver an accessible website. Created a digital Accessibility Working Group to review and enhance our processes, champion accessibility, raise awareness, and promote inclusivity.

- Progress:
  - Starting to deliver pages on Flights following accessibility standards and placing the Assisted Travel page one-click from the main menu.
  - Delivering a fully accessible 'Holiday Date and Prices' component, with other accessible components in development.
  - Ensuring link text is contextual, headings are present and correctly nested, and alt text is used.
  - Solving contrast issues with a TUI brand refresh, release due July 2023.

- Ongoing:
  - Using a combination of tools and manual audits to monitor accessibility.
  - Roadmap of accessibility improvements with new developments to comply with WCAG2.1 AA

- Next steps:
  - Replacing legacy tech with new Flights platform technology
  - Publishing accessibility statement
  - Adding an accessible hotels filter, linking to AccessAble from our website to support finding accessible products.
  - Reviewing content for digital inclusion
  - Freephone for customers to contact the Assisted Travel Team

Five things all airlines can do to improve:
1. Consumer Research

Consumer research is an essential aspect of ensuring accessibility in digital products and services, for the following reasons:

- **Understanding User Needs**: User research allows airlines to gain insights into the diverse needs, preferences, and challenges faced by individuals with disabilities. By directly engaging with users, airlines can identify specific accessibility requirements to bridge the gap between assumptions and actual user experiences.

- **Tailoring Design Solutions**: Airlines can gather valuable feedback from users with disabilities to help tailor design solutions and make informed decisions to improve accessibility. By involving users in the research process, airlines can ensure that accessibility features implemented align with users' expectations and requirements.

- **Empathy and User-Centred Approach**: User research fosters empathy and a user-centred approach in designing for accessibility. By actively engaging with users and understanding their unique perspectives and challenges, airlines develop a deeper appreciation for the importance of accessibility. This empathy drives a commitment to creating inclusive solutions that prioritise the needs and experiences of individuals with disabilities.

1

hi

© Hassell Inclusion Limited, 2023
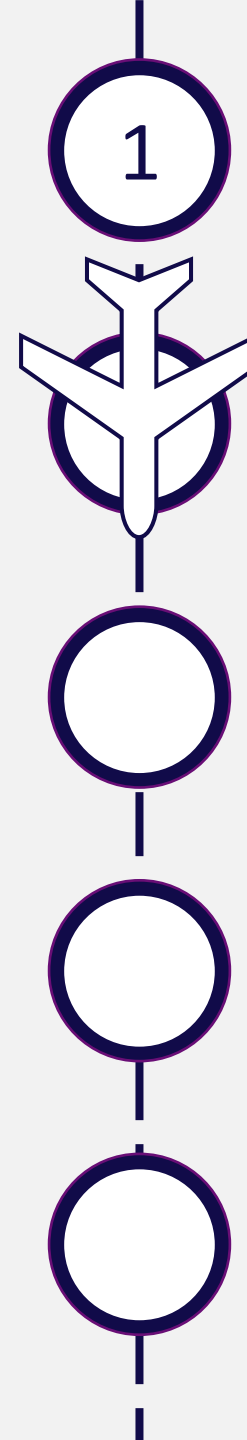
Five things all airlines can do to improve:
2. Consider the Overall Consumer Journey

Airlines must consider the whole consumer journey when addressing accessibility, rather than focusing solely on specific touchpoints such as websites or apps. They should do this to build:

- **Inclusive Experience**: By considering the whole consumer journey, airlines ensure that users with disabilities have an inclusive experience from start to finish. Accessibility barriers at any stage of the journey can hinder users' ability to interact, access information, or complete desired actions. Taking a holistic approach allows airlines to identify and address these barriers at each and every touchpoint.

- **Comprehensive Accessibility**: Users may encounter challenges in pre-transaction stages, such as searching for information or making initial contact, as well as post-transaction stages, including support and feedback. Considering the whole journey enables airlines to implement accessibility measures across all stages, leaving no gaps in the user experience.

- **Positive Brand Perception**: Airlines that prioritise accessibility throughout the consumer journey send a powerful message about their commitment to inclusivity and consumer satisfaction. This fosters a positive brand perception, enhances consumer loyalty, and differentiates the organisation from competitors.

Five things all airlines can do to improve:
3. Accessibility Statements

Having up-to-date and accurate accessibility statements is essential for airlines in demonstrating their commitment to inclusivity and ensuring transparency with their users, through the below methods:

- **Clear Communication**: Accessibility statements serve as a means of clear communication between airlines and their users. By providing accurate information about accessibility features, limitations, and efforts made to address accessibility issues, airlines enable users to make informed decisions about accessing their digital platforms.

- **Managing User Expectations**: Up-to-date accessibility statements set accurate expectations for users with disabilities. By clearly outlining the accessibility level of their platforms, airlines manage user expectations and avoid potential disappointment or frustration. This allows users to determine if the provided accessibility meets their specific needs and make informed choices.

- **Trust and Credibility**: Accurate and up-to-date accessibility statements build trust and credibility with users. When airlines provide transparent and reliable information about their accessibility efforts, users can perceive them as trustworthy and committed to inclusivity. This trust fosters positive relationships and encourages users to engage with the airline's products or services.

3

Five things all airlines can do to improve:
4. Go Beyond WCAG

Whilst WCAG is a great baseline for accessibility, going beyond the guidelines and incorporating best practice features can hold significant importance in ensuring digital accessibility. For example, implementing a minimum text size can help with the following:

- **Visual Impairments**: Many individuals with visual impairments, such as low vision or age-related vision changes, rely on larger text sizes to read content comfortably. Increasing the text size can enhance legibility, reduce eye strain and allow users to access information without difficulty.

- **Cognitive Impairments**: Individuals with cognitive impairments may have difficulties processing and comprehending information when presented in small text sizes. Enlarging the text can aid readability and comprehension for these users, ensuring they can access and understand the content more effectively.

- **Mobile Devices and Responsive Design**: With the increasing use of mobile devices for accessing digital content, text size becomes even more critical. Small screens and varying resolutions can make smaller text sizes illegible, leading to frustration and limited access for users.
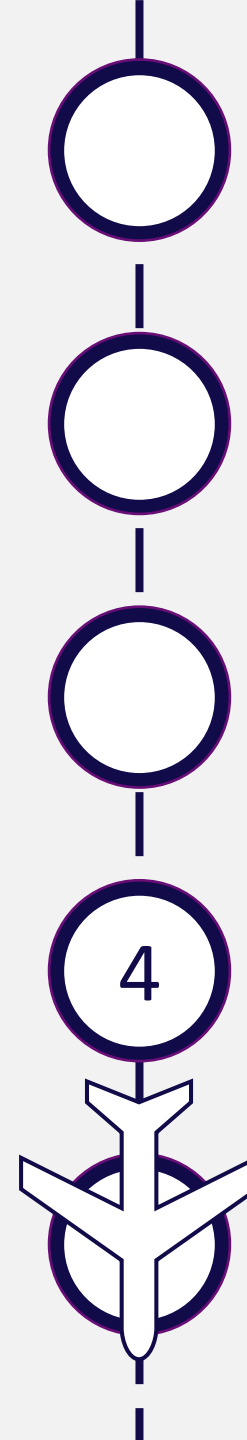
Five things all airlines can do to improve:
5. Guidance & Reassurance

Airlines must prioritise providing guidance and reassurance to users in terms of accessibility to empower them and reduce frustration.

- **Empowering Users**: By offering clear guidance and reassurance, airlines empower users with access needs to navigate digital platforms with confidence. Providing them with the necessary information and resources enables them to make informed decisions, access desired content, and engage effectively, fostering a sense of inclusion and independence.

- **Reducing User Frustration**: Lack of guidance and reassurance can lead to user frustration when facing accessibility barriers or uncertainties. By offering clear instructions, tips, and support, airlines can help users overcome obstacles and navigate through their platforms more easily. This reduces frustration, enhances user satisfaction, and encourages continued engagement.

- **Building Trust and Loyalty**: When organisations proactively address accessibility concerns and provide guidance, they build trust with their users. This trust fosters user loyalty and encourages continued engagement with their products or services. Users appreciate organisations that demonstrate a commitment to accessibility and user support.

5

hi
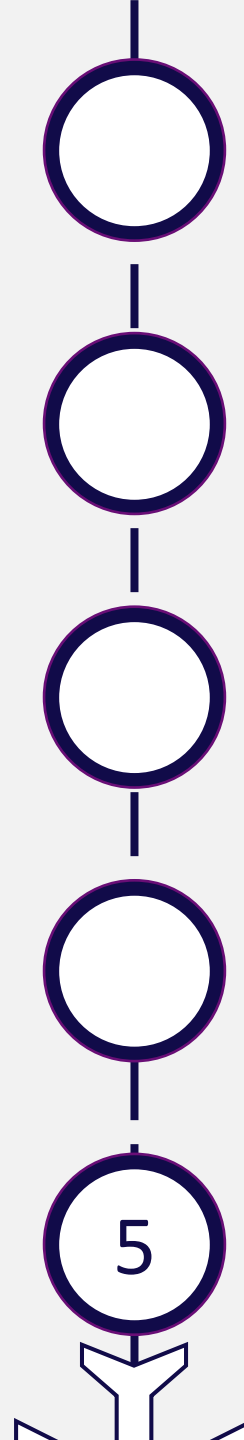
Mobile Apps:
Importance In The Consumer Journey

- **The best inclusion comes from giving users choice.**

- Ensuring that a website and mobile app are both accessible **allows users to choose between options based on their abilities and complexity of journey.**

- **For some, the digital literacy required to make reasonable adjustments on mobile apps is different** to changing settings and appearance on websites.

- **Some assistive technology works differently on mobile apps** or may not be available on the particular device or version a user has.

- **Considering the accessibility of mobile applications is crucial to ensure that individuals with disabilities have equal access** to information, services, and functionalities across digital platforms, regardless of the device they are using.

- It is important to note that for **some users** with access needs, **mobile apps are not their preferred device** due to problems integrating with their assistive technology.

Quote from Consumer Feedback Sessions

"
I tend not to use apps as they do not work with my Dragon Naturally Speak software
"

Key Links to Explore App Accessibility More:
https://www.w3.org/WAI/standards-guidelines/mobile/

https://www.nomtek.com/blog/usability-accessibility

Mobile Apps:
Common Issues And How To Improve

Common Issues

- **Smaller text sizes are generally more difficult to view** on mobile devices. Several of the apps show small text size making perception difficult.

- **Reasonable adjustments such as magnification are generally turned off in a mobile app** making it harder for some users make changes.

- **Colour contrast on mobile apps does not appear to have been tested as thoroughly as the websites.**

- **Labelling and structure across several of the apps isn't consistent** with several areas not being compatible with assistive technology .

- **Small touch sizes make operation difficult for some users** and alternative input often don't activate the controls.

- Mobile orientation may be fixed for some users so **the app should work in both portrait and landscape** and respond.

How to Improve

- **Reasonable adjustments and assistive technology are still used across mobile devices.** It's important that this is tested across the app to ensure inclusion. For example:
  - Voice input
  - Dark mode/High contrast
  - Keyboard input

- These all may all be used on mobile apps and show issues across the mobile apps.

- Touch sizes across the mobile apps aren't consistent. **Care should be taken in controls so users with a variety of dexterity can operate them successfully.**

- Information about the app – accessibility information, limitations, contact information etc. are often missed on the app store. **Users would benefit from being able to see this and make informed decisions as to whether the app or website would work better for them.**

3. Direct Consumer Feedback (Speed Dating)

Content	Page
How we gathered Direct Consumer Feedback – "Speed Dating"	Page 63
Common Insights Across Different Disabilities	Page 64
A Person Who Describes Themself As Autistic	Pages 65 to 67
A Person Who Describes Themself As Elderly With Impaired Hearing And Difficulty With Touch	Pages 68 to 70
A Person Who Describes Themself As Having Cognitive Dyslexia And Problems With Short-term Memory	Pages 71 to 73
A Person Who Describes Themself As Blind	Pages 74 to 76
A person who describes themself as having multiple sclerosis (MS)	Pages 77 to 79
A Person Who Describes Themself As Having A Motor Impairment	Pages 80 to 82

hi

How we gathered Direct Consumer Feedback –
"Speed Dating"

- To **make accessibility "real"** for the airlines, the CAA wanted to provide an opportunity for them to **hear directly from consumers with a disability or access need** about their experiences booking flights through digital products.

- To enable this, we conducted **Consumer Feedback Sessions (Speed Dating)** in which a group of attendees from all 11 airlines, along with the CAA and members of the CAA's Consumer Panel, were given an opportunity to learn from **6 consumers who have lived experience of a disability or access needs including:**
  - ○ Autism
  - ○ Elderly with impaired hearing and difficulty with touch
  - ○ Cognitive dyslexia with short-term memory issues
  - ○ Blindness
  - ○ Multiple Sclerosis
  - ○ Motor impairment

- This is the **most compelling and interactive way** to understand the digital needs and perspectives of consumers with disabilities is to **hear from them directly**.

- The disabled participants reviewed a selection of the airline sites before the "speed dating" to generate notes on elements such as:
  - ○ Home pages
  - ○ Assistance pages
  - ○ Consumer service pages

- Then during the "speed dating" sessions they provided live guidance and feedback on questions such as:
  - ○ What makes a good booking experience for them?
  - ○ How do they prefer to contact organisations?
  - ○ Is there anything particular on Airline sites that make it difficult for you to use or understand?

- ○ **This section provides key insights from what we learnt.**

Common Insights for all 6 "speed daters"

Customer service availability and training to provide reassurance

- Both digital and physical accessibility barriers can occur for disabled users and it's important that customer service is easily available at these times.

- From an online perspective, it is critical that customer service numbers are provided, and that these are easily found, to provide reassurance for users.

- Customer service agents need to be aware of the different people who may be contacting them, and have training on how to understand and support their needs.

- This could include ensuring that they are aware of the correct terminology to use for referring to different disabilities, and through consciously adapting the speed & tone of how they speak so they do not overwhelm users.

Consider the end-to-end journey

- Users can often get frustrated because their online experience does not match up with what occurs either on the airline or at the airport.

- The online booking process (either website or app) should not be designed in a silo, but instead as a part of the whole airline experience.

- Whilst there are limitations to what an airline can influence, they should consider how to provide support and guidance in both the online and physical elements of the user journey.

- For example, it's helpful to provide details beforehand on what to expect at the airports, and information on where to find "safe spaces" for users if they feel anxious or overwhelmed.

Simplicity & Signposting

- Travelling can be a stressful experience for different users, with one identifying that they are "terrified" to book flights online in case they get it wrong.

- To reduce as much anxiety as possible, these users' need simple processes, with one even identifying that "the least number of clicks" would win their custom.

- To help with this, signpost information and required actions clearly so that users can book their flights as efficiently as possible.

- Consider also moving any accessibility/special assistance links to the top of the page so that users do not have to "search" for extra support.

A person who describes themself as autistic
User Profile & Experience Online

User Profile

- Autistic female, lives in Scotland with husband and two children. An entrepreneur, runs a charity for autistic people

- She doesn't consider herself disabled - the world can disable her through attitudes, processes, behaviours that don't enable her

- Has mild to moderate hearing loss and tinnitus

- Experiencing high levels of stress can affect her eyesight and hearing

- An Android mobile phone user

- About 700,000 people are on the autism spectrum in the UK (National Autistic Society)

Assistive Technology & Problems they find online

- When travelling, she tends to use her mobile phone. At home, she uses the biggest screen she has

- She changes font on her devices (uses Comic Sans on her mobile) as certain types of fonts are easier for her to read as she has 'visual disturbances'

- She finds black text on white tiring on her eyes, she prefers low contrast, or white text on black – she is gradually exploring the accessibility features on her phone

- She tends to zoom in on desktop when her eyes are blurry, or reduce screen brightness

- Information for her must be in a logical order, with a contents menu at the top of the page

- Retaining information is an issue: "I like systems that send you a code". She gets tired if she has to remember information

A person who describes themself as autistic
"Speed Dating" Insights

How do you feel about booking things online & what makes a good experience?

- "It's really important when I'm looking at websites and transacting online that those websites have been designed to be very customisable so that I can customise them to my needs."

What is important to you when communicating directly with an organisation?

- "Knowing that staff are well trained and that when I speak to them, they're going to understand how to support me in that particular situation - that's actually something I'd happily pay more for."

- [For people with autism] "If you provide as much information as possible and you make people feel safe, they're going to choose your airline over another one."

- "I would like to be able to log into your website, put information about what my needs are in there"

What do you struggle with when booking online?

- "I want to be able to turn the off the *noise*"

- "I can get sensory overload or feel extremely anxious if there is a lack of relevant information. Having the ability to control my experience is very enabling"

What could help improve your booking experience?

- "Actually I would like a user interface with a log-in where I can set my preferences. Where I can say 'I'm not interested in all of this stuff, just give me the stuff I really need'"

- "I think it's a really critical piece of design thinking work that needs to go on around the end-to-end experience… The websites should support and enable that."

- "When you're dealing with a situation that perhaps as an airline you don't have control over – a cancelled flight or whatever. Telling me what the best thing to do in that situation – that massively important to me."

A person who describes themself as autistic
"Speed Dating" Additional Notes

Overall

- "Some airlines used visualisations to make it clear quickly where they did and didn't fly to – this saved time"

- However, "several airlines didn't offer direct flights – they should have said that at the start"

Home Pages

- "A couple of the websites had better user interfaces than others - more high contrast, more intuitive"

- "but none offered quick easy access user interface customisation options like the National Autistic Society website"

Assistance Pages

- "One airline only talked about children's/minor's needs under 'special assistance' - I was expecting to see more diverse information here rather than just references to medication and how to manage risks related to that re: international travel"

How to raise complaints/consumer service

- "Feedback/complaint forms with simple user interfaces and options were the ones I preferred"

- "I would prefer to submit a current issue by text / online rather than sit in a phone queue and risk getting cut off"

Accessibility Statements

- "I am increasingly not interested in these - invariably these statements relate to the website-only, rather than the entire consumer services experience end to end."

A person who describes themself as elderly with impaired hearing and difficulty with touch
User Profile & Experience Online

User Profile

- 79-year old male, lives with his wife in London.

- He has a hearing impairment which affects his ability to use the phone.

- There are over 11 million people in the UK who have a hearing impairment (UK Government).

- He also has peripheral neuropathy (no sense of touch in his hands). This condition also makes typing difficult and slow.

- He does almost all his purchases online: groceries, banking - "I haven't been in my bank branch for the best part of 10 years", and insurance.

Assistive Technology & Problems they find online

- He prefers a computer with a full keyboard to a mobile phone – touch screens are not tactile enough for him to use easily. He uses his PC because it has a large screen and a keyboard with large keys.

- He finds it hard to hear despite wearing his hearing aids, he uses subtitles on TV. However, he finds automated captions useful but – there is a time lag, not always accurate and not helpful after a while.

- He has not been trained in lip-reading but seeing the face and moving lips helps him to understand what they are saying. He usually asks people to speak slowly.

- His difficulty using websites is to do with the lack of feeling in his hands – while he is fine with moving the mouse pointer and clicking, scrolling is difficult. Typing is ok for entering little bits of information, but using live chat under time pressure is extremely annoying.

- He doesn't use any assistive technologies – when you're old, new technologies take a while to understand.

A person who describes themself as elderly with impaired hearing and difficulty with touch
"Speed Dating" Insights

How do you feel about booking things online & what makes a good experience?

- "When you get older, one of the things that you tend to find is your anxiety levels are much more easily triggered than they used to be"

- "When you're trying to do something like book a flight, it starts to become a rather stressful experience because it's simply not easily provided and not easily laid out."

What is important to you when communicating directly with an organisation?

- "Well, the best way for me is actually a video call"

- "I find the mobile for example really quite difficult to hear properly in an okay fashion."

- "with the video...if I see the face of whoever it is I'm talking to, then their speech becomes easier to hear. "

What do you struggle with when booking online?

- "So, the first problem is finding the disability assistance part on the screen, and that's not always straightforward."

- "It's not clear necessarily where to find them. And then there are varying degrees of help that are given."

What could help improve your booking experience?

- "It would be quite nice to see at the tabs at the top of the screen a disability tab so you don't have to go and find it in places such as the FAQs"

- "One thing that would help life enormously was if there were a centralised customer thing where you get a number because you disabled… and then every airline knows you have additional needs"

A person who describes themself as elderly with impaired hearing and difficulty with touch
"Speed Dating" Additional Notes

Overall

- "The sites and assistance pages need to be well signposted"

Home Pages

- Too many tabs can get in the way

- Overly promotional homepages make it difficult to navigate

Assistance Pages

- "The assistance information was very, very variable, generally quite poor in terms of what was being offered, what was being made available and how you actually get that assistance."

- This needs to be easily found and signposted – having to find the pages through FAQs or search adds difficulty

- The best pages are those that have a good tone of voice regarding accessibility and have well judged comments

How to raise complaints/consumer service

- Similar to assistance pages it needs to be well signposted – having to search through different methods makes it more difficult

Accessibility Statements

- These shouldn't be described as something they "have to do", but instead use friendly language

- Need to call out the features that the sites do not enable e.g. increasing font size

A person who describes themself as having cognitive dyslexia and problems with short-term memory
User Profile & Experience Online

User Profile

- User with cognitive dyslexia and problems with short-term memory,

- There are over 6 million people in the UK (around 10% of the population) that have dyslexia. ([British Dyslexia Association](#))

- Male, aged 40, married and full-time dad.

- Lives outside London & works in tech industry

- Describes himself as an "early adopter" of technology

Assistive Technology & Problems they find online

- "It takes me a lot longer to learn and study. I get really tired very quickly when I have to do reading so I can't read for relaxation like most people can. Writing is difficult, so filling in forms is a problem."

- "My short-term memory isn't great. If I don't leave my keys and my wallet in one of two places in the house, they are lost. Sometimes I can be in a meeting and I can rehearse to you all of my actions that I need to do, 5 minutes later I won't be able to remember what those actions were. This is just really embarrassing."

- "I'm sort of completely "Appled-up". Mac has all the accessibility features that I need built in. I can get any email read to me, I can dictate on my Mac Pro, on my iPhone and iPad without any additional software"

- "I have a scanning app that I use on documents. I can scan with my iPhone upload the documents within minutes and I have another app on my iPhone that can read the document to me."

- "Misreading something or reading the wrong thing is a very common thing for me to do"

A person who describes themself as having cognitive dyslexia and problems with short-term memory
"Speed Dating" Insights

How do you feel about booking things online & what makes a good experience?

- "I am terrified because I am afraid I will miss something and it will cost me to fix this"

- But "one of the things was there were quite a few of the websites that what I think I called them as to the point. It had a booking thing right at the top right in your face when you log into it and I liked that it was, it was simple."

What is important to you when communicating directly with an organisation?

- "customer service numbers are really important as I would much rather talk to someone"

- "Chat functions aren't great because my written ability is much below my verbal so I need to talk to someone directly as typing out requires a lot more effort"

What do you struggle with when booking online?

- "I don't book flights online as I am extremely nervous"

- "My fear is punishment" [for making a mistake]

- "So specifically writing is difficult and reading, really scripted pages are really difficult to navigate for me"

What could help improve your booking experience?

- "Simplicity – I love a clean website"

- "As few words as possible" [as too many can become overwhelming]

- "Iconography is a great help" [imagery gives confidence that they are selecting the appropriate element]

- "Consistency is essential" – if there are too many design updates or refreshes, they have to re-learn how to use the site or app

hi

A person who describes themself as having cognitive dyslexia and problems with short-term memory
"Speed Dating" Additional Notes

Overall

- "These websites really made my eyes tired, I can't put it down to a specific one but to try and find information on these sites is hard!"

Home Pages

- The site becomes difficult to use when it is "too busy".
- The background pictures can deter me if they are not related to the content I am looking for.
- The best experience for me is the sites that were straight to the point and well laid out.

Assistance Pages

- The best sites are those that had a contact number that was easy to find.

How to raise complaints/consumer service

- The use of generic drop downs for website complaints does not give me confidence that what I raise will be actioned.
- Chat functions are not easy for me to use at all.
- For one of the airlines it took a while to locate this so "I will do my best not to have to use this Airline with how hard it was to find the page and there was no number given".
- There needs to be multiple ways of communicating complaints. One of the sites used a form and "if this is the only way to start a complaint I would not fly with this airline again".

Accessibility Statements

- For sites with statements, the best ones are those that did not have too much reading but instead had a good layout that structured the content.

A person who describes themself as blind
User Profile & Experience Online

User Profile

- Blind female in her 50s, married with two daughters.

- 340,000 people are registered blind in the UK with over 1.6 million who have another vision impairment ([Royal National Institute of Blind People](#))

- London-based artist, who runs a life-coaching business for artists with visual impairment.

- Travels independently and has two guide dogs - a young one and a retried one.

Assistive Technology & Problems they find online

- She uses a screen reader to access the internet on her laptops (Jaws on PC, with backup VoiceOver on Mac) and VoiceOver on her iPhone.

- She runs her business mainly through the iPhone, and uses the mac and pc for websites.

- Needs things to work well with that screen reader – alt-text on images, proper headings, lists and a consistent layout to help speed browsing.

- Example site that does this well: UK Gov Tax Return

A person who describes themself as blind
"Speed Dating" Insights

How do you feel about booking things online & what makes a good experience?

- If the booking process fails because it is not accessible it makes me feel "Worthless. Absolutely worthless. It makes me feel as if I'm doing something wrong, even though I know I'm not."

- However, "Some of them were lovely, some of them had alt text on the images, so beautiful descriptions of what people could say and that felt really welcoming"

What is important to you when communicating directly with an organisation?

- "One of the websites special assistance didn't mention disabilities, it was all about children, which really put me off"

- "I thought, I'm not booking with you if I don't know at the beginning what special assistance might be available"

What do you struggle with when booking online?

- "I must admit I have never, ever, ever (up to the Pandemic because I haven't travelled since) managed to book a journey completely by myself"

- "Each usually fails either on the booking that I can't get to the dates properly, or something like that, or I can't set the passengers or something like that."

- "Or it fails on the credit card bit because you've got a plug-in from an external place and that plug-in isn't accessible."

What could help improve your booking experience?

- Listing special assistance so that its easy to find the information

- "For me it's labelling things properly, using headings properly, using list properly, using tables properly and being consistent and not and everything on the home page so it makes it really overwhelming."

A person who describes themself as blind
"Speed Dating" Additional Notes

Overall

- Sites need to be tested with multiple screen readers so that users with different software can still operate them.

- Some of them were very good, used alt-text on their images and had consistent use of headings.

Home Pages

- Consider the accessibility and placement of third-party content such as cookie banners – "it bought me into the site at the bottom which was not good".

- Use logical headings but not too many as it takes too long to read through with the screen reader.

Assistance Pages

- Having special assistance as you go through the booking is really helpful as it gave "reassurance at the time of booking" rather than just at the end.

How to raise complaints/consumer service

- "I found none of the websites had easy routes if you wanted to make a complaint" as they weren't labelled logically and it felt like they were "hiding"

Accessibility Statements

- Need to be kept up to date so "I lost confidence in accuracy elsewhere"

- Consider having the accessibility statement at the top "so I don't have to go looking for it"

- Be careful with the language used – "some said the site works best with the latest technology" and this felt like "the onus was on us" to have that.

A person who describes themself as having multiple sclerosis (MS)
User Profile & Experience Online

User Profile

- Man in his 50s with Multiple Sclerosis (MS).

- Over 130,000 people in the UK have Multiple Sclerosis; commonly diagnosed in people between ages 20 and 30 ([MS Society](#)).

- His MS developed in last 10 years whilst working for (FTSE 100) employer who treated him well (he is still advocate for them).

- Now runs social media for MS community and many other organisations.

- He needs to plan ahead, work from home, know where the nearest toilet, bed, quiet room is.

Assistive Technology & Problems they find online

- He doesn't have MS visual issues.

- His challenges are:
  o Multi-tasking (so likes non-complex screens which aren't anxiety-inducing)
  o Typing (he works around it, with Dragon Naturally Speaking – voice control)
  o Memory (his thinking is not brilliant – his vocab has reduced – complex words are leaving him – language capabilities are reduced somewhat)

- Devices: mostly iPad and phone; laptop for when he needs keyboard/Dragon text entry.

A person who describes themself as having multiple sclerosis (MS)
"Speed Dating" Insights

How do you feel about booking things online & what makes a good experience?

- "I need a very simple process. I have to think about if I'm going to travel, get over the nerves, get over the challenges of going to certain countries"

- "I'm a nervous traveller and I want the reassurance of I want the easy booking on the one side"

What is important to you when communicating directly with an organisation?

- "This special assistance and all the other stuff that comes with it and would come with plenty of other disabilities not just wheelchair users... I want easy access to"

- "I know what I need, but I need to get there quickly because of my, well, let's call it impatience for want of a better word"

What do you struggle with when booking online?

- "Reams of text is off putting to my brain and my fragility"

- "One of the challenges is mess/busyness – I want the minimum and I want the menu and booking at the top with the rest below"

What could help improve your booking experience?

- "When I get into a website I need the least number of clicks and the least number of distractions before I click on the booking and book with you."

- Sectioned choices make it much easier to navigate information

- "I want someone with diversity in recruitment and a company who have put the time into disability inclusion"

A person who describes themself as having multiple sclerosis (MS)
"Speed Dating" Additional Notes

Overall

- I am constantly fatigued so the speed and ease of transaction is important

- When it comes to comparing competitors, the least number of clicks will get my booking – Amazon is a great example

Home Pages

- A good common theme was the booking strip across all the home pages so I didn't have to search for it – this was reassuring

- Promotions & "extras" become a distraction

Assistance Pages

- "I need in my fragile state the reassurance that I can get to the assistance part of the website"

- "I get lost in reams of text" as my brain doesn't function that way so need clear paths to follow

How to raise complaints/consumer service

- I don't want to have to scroll all the way to the bottom to find these links – I want them at the top

- Consider the labelling of these links – initially I searched for "complaints" or "feedback" before looking for "contact us"

Accessibility Statements

- It would be good if this linked through to the special assistance content as well

- Similarly to booking, the lowest number of clicks to access is preferable because of my tiredness

A person who describes themself as having a motor impairment
User Profile & Experience Online

User Profile

- User with a mobility impairment, and motor impairment that limits the range of motion in his hands, their strength and dexterity.

- 46% of people with disabilities in the UK have a mobility/motor impairment; that's over 6.5 million individuals (Family Resources Survey: financial year 2020 to 2021)

- Male, lives in London. Works at a Diversity & Inclusion consultancy business and as a freelance events and podcast assistant.

Assistive Technology & Problems they find online

- His disability means that he struggles to use a physical keyboard on his PC

- Uses speech to text software – Dragon Naturally Speaking – "[with Dragon] I kind of get the independence back that I don't really have any more without it."

- However, if design elements are not labelled correctly, he cannot use the website independently. "Maybe I'm doing an order online, if none of these elements is labelled correctly, I can't do that order on my own, I'll need help with that."

- Websites that use time out feature are inaccessible for him. "Any website that uses time out, when you are not typing the technology thinks that you're done and you need to start that process all over again."

- His experience is that 3 to 4 out of 5 websites can be inaccessible on average.

hi

A person who describes themself as having a motor impairment
"Speed Dating" Insights

How do you feel about booking things online & what makes a good experience?

- Booking can be "a lot of back and forth" – you have to book the experience and then they're like "oh well that's actually not going to be accessible so we're going to refund you".

- I need the site to have the ability to interact seamlessly with the website using my Dragon Naturally Speaking software

What is important to you when communicating directly with an organisation?

- "Having a chatbot is valuable if it's accessible, but I've yet to find a chatbot that's accessible."

- "I don't mind getting multiple notifications on various devices because it means I'm not going to miss it."

- Phone numbers – "So that should be at the top in my opinion straight away because if I'm looking at the assistance page, more than likely if I'm not understanding what's on the page I'm going to want to phone."

What do you struggle with when booking online?

- "The main challenges that I had on the different websites was the lack of digital accessibility."

- "I think people don't realise the impact that that has on a user like me. Because I'm telling my software to click somewhere and it's not doing what it needs to do." [because it isn't labelled correctly]

- When my sessions end automatically because it takes me longer to interact with the system

What could help improve your booking experience?

- Avoid using technical jargon – "I just want to know if I can get my chair on the plane safely"

- "A central hub of knowledge around conditions" – similar to the passenger assistance app for trains

A person who describes themself as having a motor impairment
"Speed Dating" Additional Notes

Overall

- Sites have varied accessibility – if they aren't labelled correctly, the won't work with my software

- "it was really frustrating" – most of the times the destination bar wasn't working as it was supposed to

Home Pages

- Ensure that all "clickable" elements are coded as such otherwise I am forced to manually operate my devices and I have limited dexterity

Assistance Pages

- Consider putting the mechanism for booking special assistance at the top of the page rather than after all the information

- Categorise the information by disability/need to make it easier to navigate and read

How to raise complaints/consumer service

- It helps to have a search bar to find items quickly – navigating through multiple tabs and elements becomes tiring

- Put phone numbers at the top of the page so that I don't have to scroll all the way down to the bottom to find it

Accessibility Statements

- It is important to include these as they are very useful for identifying what limitations there are with the site

- WCAG 2.1 AA is a good level of accessibility to work towards and adhere to

4. Summary

Content	Page
Conclusion	
More Information About The Report	

hi

Conclusion

- Overall, the dual nature of this report has highlighted that **no airline delivers on accessibility across the entire consumer journey**, whether that is in regard to WCAG compliance or additional features such as consumer touchpoints and accessibility statements. This emphasises the **need for airlines to prioritise and enhance their accessibility services** to better accommodate passengers with disabilities on an **iterative and ongoing basis**.

- Whilst there are airlines who deliver on a basic level of accessibility, there are **some which are below what would be considered an acceptable level** and require improvements across their digital content.

- It is crucial for airlines to recognise that **accessibility is not a one-time achievement but a continuous journey.** They should strive to exceed the minimum standards and actively seek ways to enhance their services through methods such as user research to understand the needs of people with disabilities more fully.

- It is important however to reiterate that **this a constructive process in which it is recognised that each airline is on their own journey with accessibility.** The hope is that this report will motivate and incentivise airlines to make further improvements to help deliver more accessible experiences to their consumers.

More Information About The Report

- Whilst we believe the methodology used to audit and rank the digital accessibility of the airlines is accurate, we understand there are limitations to this report.

- We acknowledge that the accessibility of the sites were audited based on specific consumer journeys. This means there may be other parts of the digital content that could be better or worse when it comes to its accessibility.

- This report was also timebound and provides a reflection of the accessibility of the airlines between the months of March and June 2023. Changes to the digital content may have been made since the audits.

- We also acknowledge that the insights as part of the consumer feedback "speed dating" sessions were specific to the needs of the users selected. There are other users with differing access needs so it is important to understand your audience and their needs before implementing the suggestions.

- Each element of the report was quality assured by both Hassell Inclusion & the CAA along with implementing due process throughout.

- All airlines were provided with their recordings and went through the same process so that each were treated in a fair manner. This provided them the ability to query results and findings based on the audits.

- The report not only allowed, but encouraged a commentary response from each airline so they could express their views not only on the findings but their ambitions going further.

- All of the findings were based on evidence either through audits or the consumer feedback sessions. The views were formed from the expert opinion of Hassell Inclusion consultants who have over 40 years combined experience in accessibility.