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Airline Digital Accessibility Audit Report

Today, the CAA has published an Airline Digital Accessibility Audit report undertaken by Hassell Inclusion.

This is the first time the CAA has undertaken a review of the accessibility of airline's digital offerings to consumers. It has been undertaken to enable the CAA to both: understand how well the larger airlines providing flights to UK enable digital accessibility; and to drive real life improvements in digital accessibility across the sector, delivering direct benefits to aviation consumers who increasingly rely on websites and apps as their main point of access to the aviation market.

This audit is separate but complementary to the CAA's Airline Accessibility Framework, which also proposes relevant criteria on website accessibility and which will take into account learnings from this audit, including the need to capture the whole digital consumer journey, not just technical WCAG compliance.

Background

Earlier this year, we commissioned Hassell Inclusion to undertake a targeted website accessibility audit of eleven airlines. These airlines were selected for providing air transport services for the highest volume of passengers across UK airports, including considering the proportion of flights provided across the major regional airports.

We commissioned this work with the following objectives in mind:
▪ To shine a light on the important area of digital accessibility and exclusion, given the wide-ranging consequences poor accessibility can have for consumers.
▪ To build our evidence base and increase transparency around airlines' compliance with relevant accessibility requirements and guidelines and to drive improvements for consumers where needed; and
▪ To raise awareness and understanding of the different accessibility needs of consumers who book flights and request special assistance, informed by direct consumer feedback.

Scope

The report is not intended to provide a comprehensive assessment of the accessibility of airlines' full websites. Instead it is targeted at key consumer-facing journeys/content including:

- 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

While the main focus of the audit was on airline websites, the report also includes some best practice guidance for mobile apps.

More specifically, the report sets out:

(1) Key findings from the audit, and five ways all airlines can improve their accessibility

(2) How airlines perform (including a performance score) in respect of technical WCAG compliance, as well as specific advice and recommendations on how each airline can improve compliance;

(3) How airlines perform (including a performance star rating) in respect of key aspects of the digital consumer journey (including the accessibility of consumer touch points, accessibility statements, and usability & inclusion)., as well as specific advice and recommendations on what each airline can do to improve accessibility;.

(4) Common themes on what drove down accessibility scores and star ratings for some airlines;

(5) Direct feedback from consumers with different accessibility needs on their lived experiences of using airlines' websites and apps.

Key findings

(1) Overall, this report has revealed that no airline fully delivers on accessibility across the entire consumer journey, whether that is in regard to WCAG compliance or key aspects of the consumer digital journey noted above. This emphasises the need for airlines to prioritise and enhance their accessibility services to better accommodate passengers on an iterative and ongoing basis.

The report highlights five ways all airlines can improve their accessibility: (i) undertaking consumer research to enable airlines to understand the diverse needs of consumers with accessibility requirements; (ii) considering the overall consumer journey to ensure an inclusive experience and addressing access barriers at each stage on the user journey rather than in siloes; (iii) having clear and accurate accessibility statements to aid support and transparency which manages expectations and builds trust; (iv) going beyond WCAG AA compliance on features such as text size; and (v) providing guidance and reassurance on how consumers' needs will be met.

(2) The report also revealed that airlines' compliance varies considerably across WCAG and key aspects of the digital consumer journey, with scores/star ratings varying from very good to poor/below minimum standards. Whilst there are airlines who deliver on a very

good, good or basic level of accessibility, there are some which are below what we would consider to be an acceptable level and urgently require improvement. Given that there were big differences between airline's level of accessibility, there is room for improvement across the board, even with airlines that are further along their accessibility journey.

(3) The report also set out common themes which drove down some airlines' accessibility scores some of which overlap with the comments listed under point (1) but also include:

- a lack of 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.
- 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.
- not assessing the accessibility of third-party content before or after implementation, which can be critical to the user journey, and mean that users may fail to complete their desired action.

While there are clear areas for improvement needed for some airlines, we ask readers to recognise that digital accessibility is not a one-time achievement but a continuous journey and learning process. All airlines 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. With this in mind, we ask that the report findings are viewed in this broader context and in a constructive light.

(4) The direct user feedback sessions ("speed dating") provided airlines and the CAA with the unique opportunity to interact directly with consumers and understand their experiences and explore how digital accessibility could be improved. While anecdotal, we feel these sessions were a powerful tool in making accessibility "real" for all participants and consider there are lessons that can be learnt for all from the common themes identified by all "speed daters" as well as individual insights. In particular, the insights demonstrate the wide-ranging, complex and sometime conflicting accessibility needs that consumers might have which further underlines the need for robust consumer research.

Conclusion and next steps

This is an important piece of work which we believe will help drive real improvements in digital accessibility across the sector and deliver direct benefits to aviation consumers who increasingly rely on websites and apps as their main point of access to the aviation market.

We would like to thank Hassell Inclusion and all participating airlines for their engagement and for approaching the audit constructively and being open to feedback and making commitments to implement improvements. We are particularly pleased that some airlines

have already started making changes to improve their accessibility, and encourage them to build on this.

More generally, we believe the audit highlights important advice and best practice that could be useful to all industry stakeholders, across other regulated sectors/modes of transport, and for regulators including CAA. While the CAA's website is WCAG compliant following a recent comprehensive audit, we are actively considering how we can enhance levels of accessibility and usability to reflect the advice and recommendations in this report.

The CAA may revisit airlines' websites in the future to consider the progress airlines have made in improving their digital accessibility.

Accessibility of the report

The Airline Digital Accessibility Audit report undertaken has been published in PDF form and every effort has been made to ensure that this is accessible using assistive technology. If you experience difficulties in accessing this report please contact consumerenforcement@caa.co.uk for support.