



## **Audit of train company websites – update report**

December 2017

# Contents



<b>1. Introduction</b>	<b>3</b>
Background	3
Audit of train company websites	3
Follow-up	4
<b>2. GroupSave discounts</b>	<b>5</b>
What did the audit find?	5
Follow-up action	6
Next steps	6
<b>3. Live journey information</b>	<b>7</b>
What did the audit find?	7
Follow-up action	7
Next steps	8
<b>4. Key terms and conditions</b>	<b>9</b>
What did the audit find?	9
Follow-up action	9
Next steps	9
<b>5. Conclusions</b>	<b>11</b>

# 1. Introduction

## Background

It is important that passengers get the information they need to make informed decisions when buying and using train tickets.

To this end, we worked with train companies to help develop a code of practice on retail information ('the Code'), which was adopted by the industry in 2015<sup>1</sup>. The Code sets out the information about fares, tickets and services, that passengers are likely to need to help them make informed decisions.

## Audit of train company websites

In February 2017, as part of the joint action plan for information on fares and ticketing<sup>2</sup>, we commissioned an audit of train company websites against the Code.

The purpose of the audit was to evaluate train company websites, focusing on the booking process, against the principles set out in the Code to help understand the extent to which these websites provide the information that passengers need, and whether they do so in a way that is suitably prominent, clear, and timely.

## Findings

Overall, the audit<sup>3</sup> found that most of the information that passengers are likely to need when planning journeys and buying tickets, is provided.

It also found areas of good practice, for example:

- Discounts were added automatically and were clearly explained;
- Passengers were proactively warned when a cheaper option was available; and
- Additional information was prominent and well signposted.

---

<sup>1</sup> <https://www.raildeliverygroup.com/media-centre/press-releases/2015/186-2015-03-25-1.html>

<sup>2</sup> <https://www.gov.uk/government/publications/action-plan-for-information-on-rail-fares-and-ticketing> - the action plan was agreed between Government, industry, and consumer groups and set out a number of actions designed to help deliver improvements to make it easier for passengers to choose and buy the most appropriate ticket for their journey.

<sup>3</sup> [http://orr.gov.uk/\\_data/assets/pdf\\_file/0015/25017/train-operating-companies-website-audit-overview-report-march-2017.pdf](http://orr.gov.uk/_data/assets/pdf_file/0015/25017/train-operating-companies-website-audit-overview-report-march-2017.pdf)

However, there were exceptions to this, with some information not always being available or suitably prominent, for example:

- Information only found by hovering over a word or area which was not obvious, or behind a small or unintuitive icon; and
- The use of some potentially unclear industry jargon.

We therefore wrote to train companies to highlight these findings and recommend that they review them in the context of their own websites and consider what actions they could take to improve the information they provide to passengers.

## Changes to train operators during the review

Changes to some train operators under the DfT franchising process affected our review.

The February 2017 audit was of the South West Trains website. In August the new South Western Railway (SWR) website was launched so our October 2017 review considered the new website and SWR is included in our conclusions.

The December 2017 change of franchise in the West Midlands was after the completion of our work and the West Midlands Trains websites have not been considered. References to London Midland are therefore correct and reflect the websites available at the time.

## Follow-up

In addition to these general findings, there were three specific issues where we decided to take a closer look. These related to:

- The provision of information about, and application of, **GroupSave discounts**;
- The provision of **live journey information**; and
- Information about **key terms and conditions**.

For each of these areas we asked train companies to confirm how they are dealt with on their website and, where relevant, to provide details any changes they intend to make and the timescales for doing so.

Each of these issues, including what we found and next steps, is dealt with in turn below.

## 2. GroupSave discounts

'GroupSave' offers groups of three to nine adults travelling together a third off Off-Peak tickets on the services of participating train companies.

Train companies aren't required to participate in GroupSave but those that do include: Greater Anglia; c2c; Chiltern Railways; Great Western Railway; Gatwick Express; Great Northern; London Midland; London Overground; ScotRail; South Western Railway; Southeastern; Southern; Stansted Express; and Thameslink<sup>4</sup>.

### What did the audit find?

The audit identified some differences in the way in which train company websites operate in terms how they make the GroupSave discount available and how it is selected and/or applied.

For example, on some websites the discount was applied automatically, while on others the passenger was required to select or apply it manually – and on some of these, the means of doing this was not as clear as it could be.

We therefore categorised the websites as follows:

- A. **Those websites where the GroupSave discount is applied automatically** by the booking tool when a passenger searched for the relevant number of tickets on a journey where GroupSave was available. These websites include those of: c2c; Chiltern Railways; GTR (Southern, Thameslink, Great Northern, and Gatwick Express); Great Western Railway; Hull Trains; London Midland, Transpennine Express; Southeastern; and South Western Railway;
- B. **Those websites where the passenger is required to manually select the discount from a clearly labelled drop-down menu** when entering their journey details into the booking tool. This category included: Greater Anglia; and
- C. **Those websites where the passenger is required to manually select the discount but the drop-down menu was not labelled as including GroupSave**, for example it was simply labelled as 'Railcards'. This category included: Arriva Trains Wales; CrossCountry; Grand Central; Northern; ScotRail; Virgin Trains; and Virgin Train East Coast.

---

<sup>4</sup> [http://www.nationalrail.co.uk/times\\_fares/pr354fdc0a0400020101fea1769fbf60.aspx](http://www.nationalrail.co.uk/times_fares/pr354fdc0a0400020101fea1769fbf60.aspx)

We have considered each of these approaches in turn and:

- there are clear benefits to passengers in the automated approach (**category A**), in that it doesn't require them to know about GroupSave and/or when it might be available but simply applies the discount when relevant and shows it as an option in the results that are returned from a search;
- While the manual approach can also work, it requires, as a minimum, that passengers are able to locate the means by which they can apply the discount (**category B**); and
- It is therefore important that menus are clearly labelled and/or passengers clearly sign-posted – not the case with those websites in **category C**.

## Follow-up action

We therefore asked those train companies whose websites fell into category C to make changes to their websites to improve the labelling of the drop-down menus used to access and apply the GroupSave discount.

All of the train companies listed in category C have agreed to make changes to their websites in this area (or have already done so), for example by changing the labelling of the drop-down menu to include a reference to GroupSave or discounts, as well as to Railcards.

## Next steps

We will monitor the delivery these improvements and will follow-up with train companies, as required, to ensure that the promised changes are made.

### 3. Live journey information

The provision of live journey information in journey planners is important so that passengers can plan, book, and make journeys with confidence, particularly not being able to book tickets for train that the industry knows not to be running.

As well as a being key piece of information identified in the retail information code of practice, it is also covered by the passenger information condition in train companies' licences<sup>5</sup>. This is often referred to as the Passenger Information During Disruption (PIDD) condition although it covers information at all stages of the journey, whether there is disruption or not.

#### What did the audit find?

The findings of the audit suggested that a number of the booking tools on train company websites were not including live information about cancelled trains in their search results. We were concerned about this because of the risk that passengers could book tickets on trains that are not running.

We were also surprised, given that the industry has a 'PIDD programme' and has agreed (through its National Task Force) an action plan<sup>6</sup>, which includes an action (PIDD-03) relating to live journey information. This action was designed to "make sure that customers receive up to date information and are not offered cancelled trains in journey results – and therefore cannot book onto trains that will not run", and was due for completion by March 2017.

#### Follow-up action

As a result, we decided to have a closer look at this issue and carried out a further check of train company websites in October 2017. We found that the booking tools essentially fell into three categories:

- A. **Those where cancelled trains are shown as not running, so a passenger cannot book on them but can still see them in the timetable.** We consider this to be best practice. When an enquiry is made the full current timetable is returned but any trains that are cancelled are shown as struck through and cannot be booked. This allows passengers to see what has happened to a train they knew should be running. Train companies in this category are: GTR (Southern,

---

<sup>5</sup> <http://orr.gov.uk/rail/consumers/licence-obligations-to-consumers/passenger-information-during-disruption>

<sup>6</sup> This was agreed in January 2015. The complete list of industry actions is included in the industry code of practice on the Rail Delivery Group website - <https://www.raildeliverygroup.com/about-us/publications.html?task=file.download&id=469771025>

Thameslink, Great Northern and Gatwick Express), Southeastern, London Midland; and Virgin Trains East Coast;

- B. Those where cancelled trains are not returned in the search results.** This level of functionality complies with the 'PIDD-03' action above. When a train is cancelled it no longer appears in the journey planning results. While this guarantees that a passenger cannot book onto a cancelled train, it can be confusing for passengers who might expect to see their regular train listed in the results. Train companies that fall into this category are: Arriva Trains Wales, c2c, Chiltern, CrossCountry, East Midlands Trains, Grand Central, Greater Anglia, Great Western Railway<sup>7</sup>, Hull Trains; Northern, ScotRail, South Western Railway, Transpennine Express, and Virgin Trains; and
- C. Those where cancelled trains are show as running.** This does not comply with the PIDD-03 action as there is no recognition of trains being cancelled and therefore the full timetable is returned in journey planning results, whether the trains are running or not. The only train company in this category is Caledonian Sleeper.

We are now generally satisfied that train company websites operate in such a way that a passenger should not be able to book on a ticket for a train that is not running (where this information is known at the time of booking).

## Next steps

We will be following-up with those train companies where we think there is still scope to make improvements.

We will also continue to monitor the on-going delivery of the wider industry action plan with the Rail Delivery Group, and individual train company performance in this area, by way of our day-to-day work.

This audit did not cover the specific issues associated with timetable planning and the sale of advance fares. These issues<sup>8</sup> are being looked at separately.

---

<sup>7</sup> GWR's website provides this information in the "review your order" screen (rather than on the journey results page), at which point the passenger can return to the planning options.

<sup>8</sup> More information on the timetable planning issues is available on the Transport Focus website - <https://www.transportfocus.org.uk/research-publications/publications/advance-notice-rail-engineering-works-correspondence/>



## 4. Key terms and conditions

It is important that terms and conditions, particularly those that restrict how a ticket may be used or a passenger's rights, are fair and are provided in a way that is transparent and prominent.

### What did the audit find?

While the audit found that that most of the information that passengers are likely to need when planning journeys and buying tickets is provided it also found that information is not always as prominent or clear as it could be. For example, it found that some information could only be found by hovering over a word or area which was not obvious, or behind a small or unintuitive icon and the use of some potentially unclear industry jargon.

### Follow-up action

We therefore wrote to train companies to highlight these findings and recommend that they review them in the context of their own websites and consider what actions they could take to improve the information they provide to passengers.

This is also an area where the joint action plan on information on fares and ticketing<sup>9</sup> already set out a number of relevant actions designed to make it easier for passengers to access information that will help them understand how they can use their ticket. These include measures to:

- reduce the use of rail industry jargon (Action 1);
- provide plain English ticket information (Action 4); and
- provide easy access to simple terms and conditions (Action 12).

In addition, the findings of our initial audit have been used to inform the development of the Rail Delivery Group's good practice guidance, which it will use as the basis for its on-going audits of train company websites (Action 11). The first of which will commence at the end of 2017 and will then be repeated on a quarterly basis.

### Next steps

We will consider what further action might be required in light of the findings of the Rail Delivery Group's audits (and the outcomes of the other actions).

---

<sup>9</sup> <https://www.gov.uk/government/publications/action-plan-for-information-on-rail-fares-and-ticketing> - the action plan was agreed between Government, industry, and consumer groups and set out a number of actions designed to help deliver improvements to make it easier for passengers to choose and buy the most appropriate ticket for their journey.

To supplement this, we have also commissioned specific research to help us understand the extent to which passengers are aware of, and understand, key terms and conditions, including those that restrict the way in which a ticket can be used or a passenger's rights.

For example, terms and conditions that relate to specific ticket types, such as Off-Peak and Advance tickets and restrict the times at which a ticket is valid or the stations where a passenger can get on and off, as well as those that restrict refund rights, such as those that attached to Advance tickets or specific ticket formats.

We will review the findings of this research in the spring and consider if further improvements are required, in conjunction with our wider review of terms and conditions across the industry.

## 5. Conclusions

Good information is key to ensuring that passengers can get the cheapest, most appropriate, ticket for their journey.

We therefore welcome the changes that train companies have made, or have committed to make, with regard to improving the sign-posting of GroupSave discounts on their websites. We are also satisfied that train companies are delivering against their commitments to ensure customers receive up to date information and are not offered cancelled trains in journey results – and therefore cannot book onto trains that will not run.

We also welcome the actions to which they have committed as part of the joint action plan of information on fares and ticketing. These should make it easier for passengers to access information that will help them understand how they can use their ticket and we look forward to seeing the results of the Rail Delivery Group's audits of train company websites. We will review the findings of these audits and consider if further action is required as a result.

We intend to focus, over the next few months, on the fairness, clarity and prominence of key terms and conditions – through the research we have commissioned to understand passengers' awareness and understanding of these, as well as through our own review of key terms and conditions in the National Rail Conditions of Travel as well as those attached to specific ticket types and formats.

We will review the findings of this research in the spring and consider then if further improvements are required.



© Crown copyright 2017

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](http://nationalarchives.gov.uk/doc/open-government-licence/version/3).

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at [orr.gov.uk](http://orr.gov.uk)

Any enquiries regarding this publication should be sent to us at [orr.gov.uk](http://orr.gov.uk)