

Customer Equality Impact Assessment Form

The Equality Impact Assessment (EqIA) is a means by which we can demonstrate how we have considered inclusion and put people at the heart of the decisions and changes we make.

It is a tool to explore the potential for a service, project, programme, or business plan to have an impact on a particular protected characteristic, inclusion groups, or community. This includes the impact on one or more of these groups:

- Protected characteristic groups (as outlined in the Equality Act 2010)
- Disadvantaged or marginalised groups or communities
- Deprivation and socio-economic disadvantage within local communities

Key information and clarifying aims

Title of strategy, service, business plan, programme or project	London Overground line differentiation – Re-design
Team, department or directorate	Customer Directorate
EqIA author	Customer Information Project Lead
Senior accountable person	Head of Customer Information
Date EqIA started	24/04/2023
What is the focus of this EqIA?	Project

Who would benefit or be impacted by your strategy, service, business plan, programme or project?

<p>Customer</p>	<ul style="list-style-type: none"> ▪ London Overground users – frequent and infrequent ▪ Public transport users ▪ All Londoners ▪ Visitors
<p>Employee</p>	<ul style="list-style-type: none"> ▪ London Overground frontline staff ▪ Front line staff of other modes, especially modes which directly interchange with London Overground ▪ Control room staff ▪ All TfL corporate staff ▪ Rail industry partners staff – for example, Network Rail, all interchanging train operating companies in the south east, Rail Delivery Group, Great British Railways

Provide background information and outline the aims, objectives, scope of the strategy, service business plan, programme or project

What is line differentiation?

As the London Overground network has grown, customers can struggle to comprehend the network and how it connects with the rest of the TfL network. For example, a single London Underground line may interchange with the London Overground network at four different stations, all offering a different London Overground service, but these are currently branded as one single London Overground service.

Additionally, if there are delays on one route, our customer information systems will show that there are delays on the whole London Overground system. The confusion is exacerbated for infrequent users who are unfamiliar with the network, with London Overground interchanges being particularly difficult to navigate.

We are developing an approach to line differentiation for London Overground which will allow for intuitive journey planning and wayfinding based on two strands:

1. Colour indicators
2. Names

Taken together, this work aims to improve the legibility and accessibility of the network through clearly identifying each line.

Design

The design approach will retain the recognisable and iconic London Overground umbrella brand but will be supplemented to differentiate each route. Branding outside stations, such as the orange platform roundels and station fascia will remain unchanged. Various design options were tested to gather public perceptions.

Naming

London Overground operates across six distinct routes. Currently, these routes are named point-to-point, origin/destination. Several routes have multiple branches. The entire network is represented on wayfinding, mapping and journey planning products as a single colour – our recognisable orange: [as used in the London Overground network map](#).

The Mayor of London stated his ambition for the renaming of London Overground lines to reflect London's diversity in his manifesto. The project is an opportunity to provide each line with an individual identity.

Objectives

The overall goal of differentiating between individual lines using colour and naming is to improve accessibility of the network, enhance the customer experience and increase customers' confidence to travel.

For example:

- Clearer wayfinding of the network - making it easier to navigate around the London Overground, such as at interchanges with other modes and step-free interchanges
- Allowing TfL to provide more granular information about specific lines, to make it easier for all customers to comprehend and prioritise service disruption and delays
- Helping customers see the scale of the London Overground, such as the range of places it goes to and how it connects with the rest of the network, thus highlighting journey and interchange options
- Making the information more visual rather than reliant on verbal information

The evidence base

Age

Older Londoners (aged 65 and over)

11.9 per cent of Londoners are aged 65 and over.¹ The way older customers interact with our customer information, and their requirements when travelling is different to younger customers and Londoners in general, and both need to be taken into consideration for this project.

Older online Londoners are less likely to access the internet 'on the move' or at work, use the Transport for London (TfL) website or a smartphone than online Londoners overall.² Older Londoners are also more likely to speak with staff or consult with announcements or displays in stations. (See Appendix 1 for further info).

Link between age and disability

Of all Londoners aged 65 and over, 32 per cent report that they are disabled or have a health issue that limits their daily activities. With increasing age, the proportion of people who report that they are disabled or have a health issue that limits their ability to travel and get about increases to 58 per cent among Londoners aged 80 or over.³ With increasing age, some older people become less active. Reduced activity levels are often connected to changing lifestyles, expectations, and confidence levels. Accessible transport can help people to maintain a more active lifestyle.⁴

Many older and disabled people report they would like more accurate real-time information, particularly if lifts go out of service. Real-time information while on the move is critical to help when journeys are disrupted.⁵ In addition, inconsistency in availability and quality of audio and visual announcements can impact feelings of safety, such as a lack of visual information with service updates or disruption information.

Good customer service is important for disabled and older Londoners. Staffing at stations can also disproportionately affect older Londoners, who rely on support and information.⁶ As evidence highlights, older customers already rely on station staff support when travelling, and this need will likely increase as the new line names are implemented and people adapt their understanding of the network. A lack of staff presence makes travel feel less personal and safe and it is important for staff to be approachable for customers.

¹ Office for National Statistics (2021) Census

² Travel in London: Understanding our diverse communities (2019)

³ Ibid

⁴ Travel in London: Understanding our diverse communities (2019), p.124

⁵ Travel in London: Understanding our diverse communities (2019)

⁶ Mayor of London, Inclusive London, The Mayor's Equality, Diversity and Inclusion Strategy, p107

Younger Londoners (aged 25 and under)

Thirty per cent of Londoners are under the age of 25.⁷ Twelve per cent of Londoners using the London Overground network are younger customers.

Younger Londoners are more likely to be from a Black, Asian and minority ethnic group than all Londoners. Fifty-four per cent of 0 to 15-year-olds and 48 per cent of 16 to 24-year-olds are from a Black, Asian or minority ethnic group.

The main influences on travel choices during the primary to secondary school transition are determined by independence and peer influence. Younger Londoners aged between 11 and 15 increasingly travel on their own, although they may have limited knowledge of public transport.⁸

Fifteen per cent of younger Londoners, compared with eight per cent of all Londoners feel worried about getting lost. As younger customers start travelling more independently, it's important that they feel confident to use our network.

The customer information available to help with journey planning and signs for reassurance while travelling needs to be clear, accurate and concise to prevent younger customers getting lost and help them to feel comfortable with travelling to unfamiliar places on the London Overground.

Having clearer wayfinding and more granular service disruption information will help younger customers who are using the London Overground network for the first time on their own or for those that are using the network for more practical journeys such as school or college.

Access to information

Access to the internet 'on the move' or while at work is considerably more common among young online Londoners compared to online Londoners overall. The use of smartphones among online Londoners aged 16-24 is very high (96 per cent)⁹

Among online Londoners aged 16-24, 88 per cent claim to access the TfL website, in line with all online Londoners (89 per cent). The most common use of the TfL website for online Londoners aged 16 to 24 years old is for journey planning.¹⁰ Speaking to staff is far less common among younger online Londoners than all online Londoners (21 per cent compared with 41 per cent).¹¹

As many younger Londoners are just starting to travel on their own, research demonstrates they look for more reassurance such as announcements or information displays in stations (See statistics in Appendix 1). It is important TfL have clear and accurate information available. As younger customers tend to access information digitally, it may help to use QR codes to link customers to the information online.

⁷ Office for National Statistics (2021) Census

⁸ Travel in London: Understanding our diverse communities (2019)

⁹ Ibid

¹⁰ Ibid

¹¹ Ibid

Disability

In 2021, 15.7 per cent or 1.2 million Londoners consider themselves to have a long-term health problem or disability that effects their day-to-day activities 'a lot' or 'a little which has lasted or is expected to last at least 12 months'.¹² Disabled Londoners are customers with visible and/or hidden mobility, sensory and cognitive impairments (See Appendix 1 for further information).

London Overground is predominantly orbital and serves the outer boroughs rather than the City of London. From the most recent data, there is a significant disparity across London with the number of people who say their day-to-day activities are limited a lot - the lowest in the centre or City of London at 3.9 per cent.

The London boroughs with the biggest percentages of disabled people are in north and east London: Tower Hamlets (10.4 per cent), Islington (10 per cent), Hackney (9.6 per cent), Newham (9.1 per cent). Each of these boroughs have several large interchange London Overground stations serving them. Due to the significant numbers of disabled customers in areas which London Overground services run, the project needs to consider accessibility in depth.

It is important to recognise that many disabled people experience multiple impairments. Additionally, forty-four per cent of disabled Londoners are aged 65 or over compared to nine per cent of non-disabled Londoners. A high percentage of disabled customers are also older customers.

Research undertaken in 2022 demonstrated that disabled customer confidence to travel is underpinned by three core needs: safety, comfort and reassurance. The most common pain points for customers are staff, other people, information and the built environment; and when these elements are done well, they contribute to feelings of safety, comfort and reassurance. These pain points are felt more acutely and sometimes experienced more frequently by disabled and older people compared to other customers.¹³

This was supported by the Redesigning London Overground map research which highlighted that for those with impairments, design cannot compensate for in-station staff. This research also found that information for navigation and during delays and disruption are customer pain points. Customers find it hard to differentiate between branches of the London Overground network when wayfinding, and it isn't always clear which line a disruption is impacting.¹⁴ This project will help with this issue, and make navigation clearer and easier for disabled customers.

While disabled and non-disabled customers share common barriers to travel, there are also additional pain points specific to disabled customers and shared pain points are often felt more acutely; some barriers relate specifically to the physical infrastructure of

¹² Office for National Statistics (2021) Census

¹³ Confidence and post pandemic experience for disabled customers, May 2022

¹⁴ Redesigning the London Overground map, May 2023

public transport, as well as less tangible issues such as reduced confidence in travelling independently.¹⁵

The Redesigning the London Overground map research highlighted that those with specific needs generally prefer to use the London Overground and consider it an easier journey than the London Underground. Those with neurodiversity, visual or mobility impairments like that the London Overground is calmer and more spacious than other modes of transport, and those with respiratory impairments value the fresh air.¹⁶

However, the same research notes that the London Underground is better for assistance, in-station staff and station/train announcements; London Underground navigation is easier due to its distinctly coloured lines. This project will help make navigation easier on the London Overground network, as the proposal is to give each individual line a new name and colour, which is adopting the same design principals as the London Underground.¹⁷

Access to information

Disabled customers have many of the same information needs as non-disabled Londoners: route options, timings and disruptions/changes. However, where customers have specific impairments, these can have a substantial effect upon their travel information needs and access requirements, and disabled customers require a greater level of information on inter-connected aspects of travel; navigation, comfort and accessibility.¹⁸

It is critical to ensure that information formats are accessible to all customers and that the information is consistent and available across all platforms, for example, information displayed visually must also be replicated audibly and in multiple formats to enable access across all disabilities.

A significantly lower proportion of disabled Londoners access the internet compared with non-disabled Londoners (76 per cent compared with 93 per cent). This is true for all age groups, although not to the same extent. Older disabled Londoners are considerably less likely to access the internet than younger disabled Londoners.¹⁹

The data shows that disabled Londoners use digital channels less than other customers to get their information, particularly while travelling, which highlights the need for other information formats such as audio announcements, maps, Electronic Status Update Boards (ESUBs) showing real-time service disruption information and staff presence. In this project, TfL should ensure that all these communication formats are considered and updated, to ensure that all customers have consistent, accurate information across their preferred channels.

¹⁵ Travel in London: Understanding our diverse communities (2019)

¹⁶ Redesigning the London Overground Map, Customer Research Debrief – March 2023

¹⁷ Ibid

¹⁸ Accessible Travel Information, Future Thinking, (2017)

¹⁹ Travel in London: Understanding our diverse communities (2019)

Socio-economic factors should also be considered, such as the cost of availability and access to the internet to support wayfinding/information and the age of the technology device. The table below shows that disabled Londoners are more likely to live in a low-income household, which means there is a potential for digital poverty.²⁰ This further demonstrates the requirement for alternative formats (such as maps and ESUBs providing real-time information) in addition to technological channels.

Proportion of each age group living in households with an income less than £20,000 (2016/17)

Age	Disabled Londoners	Non-disabled Londoners
16-24	40	31
25-64	58	19
64+	67	48
Total	61	25

Information is particularly important to customers in the event of a disruption. Disabled customers have similar concerns about disruptions as non-disabled customers; however, disruptions can have a greater impact upon disabled customers because they can face greater difficulties overcoming the effects. Disabled customers report that they can experience anxiety during disruption and that access to reliable, real-time information is crucial to minimise this and allow people to change their journeys.²¹

The presence of staff during disruption provides much reassurance for disabled customers as they expect them to be experts in advising on new accessible routes and providing live up-to-date information. Some disabled customers also suggest that apps and interactive information points at stations or stops would be useful to communicate disruption-related information as this can be accessed during the journey.²² Research undertaken for the London Overground line renaming project found that staff presence and support are key to ensuring customers with specific needs can travel with confidence.²³

Some disabled people plan their journeys meticulously and seek reassurance that at each step along their route they know what to do and where to go, researching suitable, accurate and up-to-date accessibility information for each station and stop that they plan to use. This takes time and can become a barrier for some. Information is therefore a major element of the service provided for many disabled customers.

²⁰ Ibid

²¹ Ibid

²² Ibid

²³ Redesigning the London Overground Map, Customer Research Debrief – March 2023

TfL already provides a wide range of maps (showing London Overground) in a digital format on the website (which customers can print off themselves), including:

- Tube map with accessibility icons (generally well received and commonly referred to by disabled customers)
- Step-free Tube map – key tool for disabled customers and provides much more detail on the accessibility of specific stations. Disabled customers whom we asked about the guide felt it to be useful once they understood it.
- Toilet facilities Tube map
- Enlarged Tube map
- Audio Tube map
- Tube map in black and white
- Tube map showing tunnels

From the guidance in ‘Design for the Mind’, TfL follows many of the measures for printed material such as: the use of recognised symbols (such as the wheelchair symbol), TfL also uses New Johnston font which is one of the easiest fonts to read, printing on plain paper, visual contrast with the white background and vibrant colours in the key, easy-read versions like the Large print Tube map are available and there is also an audio Tube map for visually impaired customers.

Disabled customers use maps and timetables widely, referring to them both at home and on the journey, and, for customers with reduced mobility, using the step-free access wheelchair symbol as a quick reference to confirm whether the station will be accessible.²⁴

Our research indicates that disabled customers have a higher reliance on paper-based sources than non-disabled customers. Many disabled customers consider paper maps and timetables to be easy to use, read and understand and offer reassurance while on the journey, especially during a disruption. They also provide customers with time to digest the information in a tangible way.²⁵

Printed information will always be needed by those who can’t use digital devices, but most customers are moving towards digital resources such as apps with on-the-go and ‘live update’ benefits. Multi-channel information provision is therefore important.²⁶ There are many apps on the market, which provide highly useful accessible travel information, filling some of the gaps in TfL’s information offering.²⁷

Design for the Mind

The Mayor has also committed to making London a dementia friendly city and TfL is working to shape a transport network that is also inclusive for people with a range of neuro diverse conditions such as autism, dyspraxia and attention deficit hyperactivity

²⁴ Transport for London (2015) Accessible travel information

²⁵ Travel in London: Understanding our diverse communities (2019)

²⁶ Accessible Travel Information, Future Thinking, (2017)

²⁷ Ibid

disorder. This will help people with these conditions to use the network safely, easily and with dignity.²⁸ The London Overground line naming project will help support the Mayor's commitment, as it aims to help improve wayfinding for customers and will also help to make the network easier to use, particularly for disabled customers who rely heavily on specific, granular information.

Preview and advance information (digital)

The opportunity to accurately anticipate and experience an environment virtually or through audio or visual description should be used to reduce anxiety. This information should provide support for planning and preparing for a visit, such as via a website, a link to information about the environments that are clear, consistent and up to date.

TfL has information available on the website and TfL Go, which customers can access prior to their journey, such as digital maps, Journey Planner and station information such as whether the station is step-free. The project should ensure all information is updated consistently in line with established standards, to try and make the journey across all touchpoints as seamless as possible for customers. All digital design must meet [TfL's Design accessibility standard](#)

Use of colour and contrast

Signs which have many different colours should not be used because they risk overloading the senses, or items being missed due to attentional bias. The use of colour coding should therefore be used with consistency and consider the potential to overwhelm.

Vivid colours and strong visual contrast are important features on signs or doors but should be used sparingly for this purpose.²⁹ The new line colours need to have enough visual contrast so they can be seen on signs at all heights, the new line colours cannot be too like existing London Underground colours, as this will be confusing for visually impaired customers, particularly on the Tube map.

The existing colour for London Overground is a vivid orange, which is synonymous with the London Overground for customers. (See Appendix 2). The new line colours should be vivid, to ensure visual contrast on signs so it is easily viewable for all customers. The project should continue to engage with TfL's Independent Disability Advisory Group (IDAG) as we work through the design and colour ways before a final decision on colour and branding. Customer Information and Design team need to trial colours across all products before they are decided and signed-off.

Visual discomfort and the use of pattern

Stripes can cause visual discomfort, as they can appear to shimmer or move when viewed. This can cause significant and acute reactions, including eye-ache, migraines, nausea, anxiety, loss of balance, depth perception and sensory overload.³⁰

²⁸ Transport for London (2018) Design for the Mind

²⁹ Design for the mind – Neurodiversity and the built environment (2022)

³⁰ Design for the mind – Neurodiversity and the built environment (2022)

Signs

Clear, readable signs are particularly important for people who find wayfinding difficult, such as people with neurodegenerative conditions such as dementia. Accessible principles should be followed, such as avoiding block capitals and italics, appropriate positioning and style of directional arrows, visual contrast and size of sign content.³¹

Clarity of information

A wayfinding system should be designed that has a clear and inclusive wayfinding and sign hierarchy. Consistency in the design of signs or wayfinding cues should be provided from the point of arrival and continue throughout the environment. Introducing a new colour, or style of sign or other wayfinding cues at a later point should be avoided to prevent potential for attentional bias.³²

TfL has sign design standards in place to ensure consistency across all London Overground stations. There are existing graphic and wayfinding principles. It is specified in the standards that signs should be clear and simple for clarity and understanding, even for customers where English is not their first language. Sightlines and font size are also dictated within the standards to ensure legibility from a variety of angles, including for accessible information where the priority height may be adjusted for wheelchair users. [TfL's London Overground signs standards are available online](#)

These need to be updated and adapted to include the new line names and colours, considering all existing principles, and looking at ways to keep consistency and familiarity for customers to ensure minimum confusion.

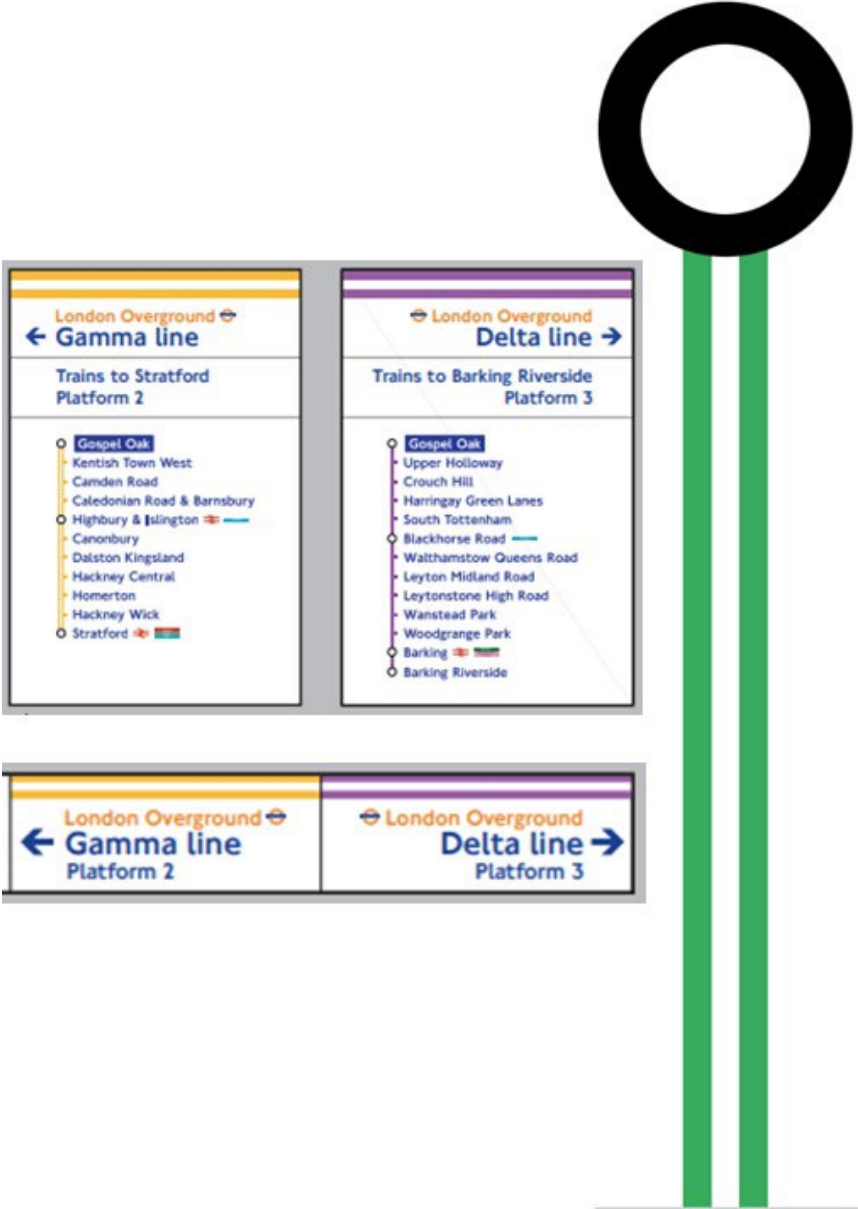
Except for universally accepted or mandatory safety symbols or pictograms, symbols or images on signs should also have supplementary text.³³ TfL has [pictogram design standards](#), which are used in conjunction with text. These are universally recognised symbols that assist people whose first language is not English or customers who may not be literate. The project should ensure that all accepted symbols are used consistently across all stations. The project should consider updating the Lift signs to the current 2023 standard, in line with other TfL modes such as the Elizabeth line (with the new colours for pictograms to symbolise step-free stations).

³¹ Ibid

³² Ibid

³³ Ibid

The design options researched with familiar and unfamiliar customers for this project produced a clear preference:



The research said this option was:

- Easy to follow and feels familiar, due to the single-colour design mirroring the London Underground maps
- The white gap still clearly denotes a London Overground service, as it mirrors the existing orange parallel lines on our maps, so the identity of the London Overground does not feel lost or diluted
- One consistent colour for each line is easier for accessibility
- The design is the easiest to use and follow-on network and Tube maps; respondents responded quicker to wayfinding tasks using this option
- The orange is not missed as it is retained at other points of the customer journey, such as on the roundel

Technology for wayfinding

Public address (PA) systems assist blind or partially sighted people. The clarity of announcements should be consistent and clear. TfL can use PA announcements to inform customers of the changes before, during and after implementation of the new line names. Messages should be clear and give a good indication of the changes customers can expect. When proposing the use of technology, designers should not require users to download an app or set up an individual login to a website where possible. It is important for the user to be able to tailor the appearance and feedback to their own preferences, for example, colours, contrast and changing audio to haptic information.

TfL customers do not have to set up an individual log in to access Journey Planner, maps, service disruption or station specific information. They can download TfL Go, but the same information is still accessible via the TfL website. TfL Go is accessible to customers with visual impairments, it works with voice over iOS, Talk Back Android and it also works with Dynamic Type and text to speech. (See Appendix 2 for further TfL Go App features).

TfL's Design team follow [the TfL Digital accessibility standard](#) and provide information with visual contrast, providing the option to change text size to suit customers' needs.

Sex

Fifty-one per cent of Londoners are women, which is the same split as across England as a whole.³⁴

Personal safety

Women are significantly less likely than men to say that they are 'not at all worried' about personal security (that is, being safe from crime or antisocial behaviour) while using public transport in London (14 per cent compared with 28 per cent).³⁵ Women are also more likely than men to report that they are worried (either 'quite worried' or 'very worried'): 34 per cent of women say they are generally worried compared with 27 per cent of men.³⁶ We know that clear and effective signs enable our customers to feel in control of their journeys and provides points of reassurance as they navigate our network.³⁷

Design and colour-blindness

There are three million colour blind people in the UK (4.5 per cent of the entire population). Men are 16 times more likely to be colour blind than women.³⁸ It is important to consider this when the project finalises the decision of the new line colours to ensure they're visible and comprehensible for colourblind people. For best practice, the project consulted with IDAG and visually impaired customers to test the

³⁴ Office for National Statistics (2021) Census

³⁵ Travel in London: Understanding our diverse communities (2019)

³⁶ Ibid

³⁷ Customer Information Strategy research, TfL, (2022)

³⁸ <https://www.colourblindawareness.org/colour-blindness/>

colours with colour blind people before the colours are manufactured on the new signs.

As women are generally smaller than men, signs need to be placed at suitable locations and heights so the information is always visible, including suspended signs and signs at eye level.

Gender reassignment

0.9 per cent of London's population reported that they have a gender identity different from their sex registered at birth.³⁹

From research that investigates the travel barriers faced by lesbian, gay, bisexual, transgender, queer/questioning and other sexual orientation (LGBTQ+) people, fear of intimidation and/or abuse emerged as a potential barrier. Modifications to travel behaviour because of such fears are thought to depend on many factors, including people's personalities, previous experiences, and the degree to which they perceive themselves as visibly LGBTQ+.⁴⁰

Marriage/civil partnership

The project will increase simplicity of the London Overground network and help with comprehension for all customers.

Victims of domestic abuse may be using the London Overground during periods of high anxiety when clear customer information, wayfinding and points of reassurance are critical for feeling safe and secure on our network.

Pregnancy/maternity

Ease of information – accessible stations

Parents (particularly mothers) experience physical barriers to accessing the transport network. The lack of universal step-free access is a barrier for wheelchair users, parents (particularly mothers) with pushchairs and those who find it hard to use stairs. Easily accessible customer information relating to which stations are step-free is useful for pregnant women or parents (particularly women) traveling with young children. It is also critical to be able to pinpoint disruption information considering that the majority of step-free journeys require additional journey time and opportunities for alternative travel options are more limited. The London Overground naming project will enable TfL to provide more granular and specific disruption information on customer information channels.

³⁹ Office for National Statistics (2021)

⁴⁰ Transport for London (2007) Understanding lesbian, gay, bisexual and transgender people's travel barriers

Safety

Women (including pregnant women) are more likely than men to report that they are worried (either 'quite worried' or 'very worried') when using public transport in London: 34 per cent of women say they are generally worried compared with 27 per cent of men.⁴¹

Race

Black, Asian and minority ethnic Londoners make up 46.2 per cent of the London population.⁴²

The London boroughs with the highest proportion of Black, Asian and minority ethnic residents have London Overground stations and lines running through them. There is a high concentration of Black, Asian and minority ethnic residents in the most deprived boroughs. According to Indices of Deprivation released by the Office for National Statistics (ONS), the most deprived London boroughs are Tower Hamlets, Hackney, Barking and Dagenham, and Newham, all of which have large proportions of Black, Asian and minority ethnic residents, and these Boroughs have a significant number of London Overground stations.

English literacy

For some Black, Asian and minority ethnic Londoners language can be a significant barrier to public transport use, especially among people who were not born in the UK. Cultural and language issues can reduce confidence and access to information, thereby limiting the extent to which people make unfamiliar journeys and their ability to travel independently.

Twenty-two per cent of Londoners have a language other than English as their first language, with Polish (two per cent), Bengali (one per cent), Gujarati (one per cent), French (one per cent) and Urdu (one per cent) being the top five main languages spoken.⁴³ This shows the wide range of languages used in London, and according to the Greater London Authority (GLA) 300 languages are spoken across the city.⁴⁴ (See Appendix 1 for statistics on top languages spoken in London).

It is important for customers with lower literacy levels or whose first language is not English that wayfinding signs have a consistent, recognisable layout on signs and digital products and that the London Overground branding remains, to ensure the network is still visually recognisable for customers.

TfL have a pictograms design standard, to assist customers who may not understand English. The pictograms are universally recognised symbols and are used in conjunction with words in plain English to make signs as accessible to all customers as possible. This design standard should be used for the new updated signs.

⁴¹ Travel in London: Understanding our diverse communities (2019)

⁴² Office for National Statistics (2011) Census

⁴³ Office for National Statistics (2021) Census

⁴⁴ Greater London Authority (2010) 20 facts about London's culture

Safety and security

Black, Asian and minority ethnic Londoners are significantly less likely than white Londoners to say that they are 'not at all worried' about personal security (that is, being safe from crime or antisocial behaviour) while using public transport: 16 per cent compared with 23 per cent. Black, Asian and minority ethnic Londoners are also more likely to report that they are worried (either 'quite worried' or 'very worried'): 33 per cent say they are generally worried compared with 29 per cent of white Londoners.

Black, Asian and minority ethnic Londoners are more likely to be worried about getting lost. This was mentioned by 10 per cent of Black, Asian and minority ethnic Londoners compared with six per cent of white Londoners.⁴⁵ The customer information available to help with journey planning and signs for re-assurance while travelling needs to be clear, accurate and concise to prevent Black, Asian and minority ethnic customers getting lost and help them to feel comfortable with travelling to unfamiliar places on the London Overground, particularly during the transition

A significantly greater proportion of Black, Asian and minority ethnic Londoners said they changed transport mode because of feeling worried (32 per cent compared with 27 per cent of white Londoners). Moving transport rises to 35 per cent among mixed ethnicity Londoners.⁴⁶

Sexual orientation

London has the highest proportion of people who identify with a LGBTQ+ orientation (gay or lesbian, bisexual, queer/questioning or other sexual orientation) (4.3 per cent). In London, 2.2 per cent described their sexual orientation as gay or lesbian, 1.5 per cent described their sexual orientation as bisexual, and 0.5 per cent wrote in a different orientation.⁴⁷

Very few differences exist between heterosexual and LGBTQ+ Londoners regarding barriers to increased public transport use, and the general profile of barriers is consistent for both groups. From research that investigates the travel barriers faced by LGBTQ+ people, fear of intimidation and/or abuse emerged as a potential barrier.⁴⁸

⁴⁵ Transport for London (2008–2011) Race Equality Scheme

⁴⁶ Transport for London (2008–2011) Race Equality Scheme

⁴⁷ Office for National Statistics (2021)

⁴⁸ Transport for London (2007) Understanding lesbian, gay, bisexual and transgender people's travel barriers

Hate crimes recorded by the police by monitored strand in England and Wales, 2015/16 to 2019/20

Hate crime strand	2015/16	2016/17	2017/18	2018/19	2019/20	Percentage change 2018/19 to 2019/20 (%)
Race	45,440	58,294	64,829	72,041	76,070	6
Religion	3,962	5,184	7,103	7,203	6,822	-5
Sexual orientation	6,700	8,569	10,670	13,314	15,835	19
Disability	3,393	5,254	6,787	7,786	8,469	9
Transgender	820	1,195	1,615	2,183	2,540	16
Total number of motivating factors	60,315	78,496	91,004	102,527	109,736	7
Total number of offences	57,676	74,967	86,254	97,446	105,090	8

Source: Police recorded crime, Home Office, Figures exclude GMP

Deprived communities, inclusion groups and socio-economically disadvantaged local communities

The definition of ‘low income’ is imprecise since it is a relative concept in which household wealth depends on several factors, including household size and non-income-related wealth. Twenty-eight per cent of Londoners can be classified as having a lower annual household income (below £20,000)

Londoners living in lower income households (below £20,000) are more likely to be:

- Women (55 per cent compared with 50 per cent all Londoners)
- Black, Asian and minority ethnic people (44 per cent compared with 37 per cent all Londoners)
- Older people (24 per cent are aged over 65, whereas people in this age group make up 13 per cent of the total London population)
- Disabled people (20 per cent compared with nine per cent all Londoners).

As of 30 June 2020, there were 9,273 asylum applicants and 1,183 resettled refugees hosted in the London region.⁴⁹ Affordability, safety, and access to information are all critical concerns. In Q4 of 23/24 there were 4.118 people seen rough sleeping in London.⁵⁰

⁴⁹ The Migration Observatory, University of Oxford

⁵⁰ Combined Homelessness and Information Network (CHAIN), quarterly data tables 2023-24, Q4

Access to information

People living in households with lower incomes, refugees and people who are rough sleeping are significantly less likely to access the internet 'on the move' or at work compared with all Londoners. Sixty-nine per cent of DE (social grade D refers to semi- and unskilled manual workers and E refers to state pensioners, casual/lowest grade workers and unemployed Londoners) who are online use the internet 'on the move' compared with 81 per cent of all online Londoners.

Smartphone ownership is lower among online DE Londoners than online Londoners overall (76 per cent compared with 84 per cent). Those on low incomes rely on easily accessible travel information. A similar proportion of online Londoners living in DE households search for real-time information as all online Londoners (94 per cent compared with 96 per cent). The information sources most likely to be used by online DE Londoners are announcements/displays (51 per cent), staff (41 per cent) and the TfL website (39 per cent)

These customers are all more likely to live with 'digital poverty', resulting in reliance on easily accessible travel information in other forms. Therefore, it is also important to have printed maps available, and real-time service disruption available in stations to ensure all customers can access this, particularly during the implementation and transition of the new names. It must also be consistent with the online digital channels to make sure the journey is seamless for all customers.

Travel behaviour

People with lower household incomes often fall into the categories of 'travel shy' or 'reassurance seeker'. Both groups tend to lack confidence in using the public transport network. For Londoners classified as 'travel shy', familiar routes and transport options appeal more than making unfamiliar journeys. 'Reassurance seekers' will conduct their journeys seeking advice along the route from staff and members of the public.⁵¹

Clear, consistent and effective customer information and wayfinding will help provide customers with points of reassurance on unfamiliar journeys and help to visualise the integration of the whole TfL network hopefully increasing confidence to travel.

Low-income households are less likely to travel by car than other Londoners, and are more likely to take the bus than other Londoners (69 per cent vs 59 per cent use the bus at least once a week). Use of the London Overground is relatively level between low-income households and other London households (11 per cent vs. 12 per cent have used the London Overground at least once a week).⁵²

For low-income Londoners, the key drivers for satisfaction on the London Overground are: the condition of the train, feeling valued as a customer and ease of making journeys.⁵³

⁵¹ Travel in London, Understanding our diverse communities, 2019

⁵² Ibid

⁵³ Ibid

Lack of education

Some rough sleepers, people in deprived areas and refugees for who English is an additional language, may have lower English literacy levels. Language issues can reduce confidence and access to information, thereby limiting the extent to which people make unfamiliar journeys and their ability to travel independently. Clear visual branding is critical for translating customer information and ensuring universal access.

Engagement and consultation

Stakeholders and inclusion groups consulted with or engaged with:

11 May 2023: Emerson Park – Mock-up of platform roundels and line diagram designs with internal TfL stakeholders

The London Overground project team visited Emerson Park station to validate the research on platform roundels and the different design options for signs in a live London Overground station environment.

Under the current scope, smaller, non-interchange London Overground stations like Emerson Park would have limited reference to new line names and colours, and research suggested it would be helpful to include platform roundels for customer familiarisation.

Feedback from this visit to indicate platform roundels should be out of scope for the following reasons:

- You only need to know the station name when arriving
- Line of route maps and digital screens confirm you're on the right platform
- London Underground station roundels do not have line colours or names
- Significant cost implication
- Potential colour clash with orange

23 May 2023: Inclusive Transport Forum

The forum welcomed the rebranding, with consensus that the current all orange maps were confusing for customers. The forum was supportive of the changes and excited about the renaming.

Some questions were raised around consideration of colours and contrasts on the London Overground map, and in comparison to the existing Tube map. We updated that the colours are going through a process of refining and testing to ensure clarity, and assured stakeholders that they would continue to be engaged on both the colours and naming.

The forum will be happy to support testing in different settings, lighting conditions and were pleased to have been engaged at an early stage in the process. We have agreed to return to the forum throughout the project at key decision points – i.e once the new colours have been finalised.

1 June 2023: IDAG

Overall positive response. Good idea if it's implemented well. It will help with navigation and make wayfinding easier for people who currently find the London Overground network confusing, by giving confidence and reassurance. The current one colour design can create stress and anxiety with customers, particularly visitors outside of London who don't know the network, so line differentiation will help with this.

Design approach

Parallel lines (with white gap) recognised as rail; better than approach in other cities such as patterns.

Parallel lines can cause an optical illusion for some visually impaired customers – the white gap in the middle can look like a pale colour rather than a white gap. IDAG members agreed to help us test this in situ to make sure it works and customers are able to navigate easily with this design.

Elizabeth Line/Docklands Light Railway (DLR) are known as particularly accessible, whereas to some customers with accessibility needs London Overground is particularly inaccessible, that is, certain sections of the TfL network mean different things to different people, so differentiating very greatly between London Overground and the Elizabeth line/DLR is important. Avoid purple and turquoise for line colours.

Final colour selection

Intersection points/stations – new colours must be distinct from existing colours.

Should test colours across all touchpoints (including digital), materials and in different conditions.

Touchpoints

Apps

Many people with accessibility needs do not use TfL Go, they rely on third-party apps. It's critical to have a strategy to third-party app changes in scope. This should be very high up TfL's agenda. When third-party apps go awry it affects many groups.

There needs to be user testing and feedback so that glitches are dealt with before anything goes live. Some customers use specific accessibility apps that aren't TfL Go, City Mapper or Google maps – we need to make sure we've captured and engaged with them to avoid any issues with design glitches as people often rely heavily on those.

Signs

Have words 'London Overground' and the roundel on some touchpoints; add more orange to signs.

Retaining destination info is important across certain channels, for example, audio visual.

Make clear on touchpoints (including ESUBs) that delays are relating to London Overground, not London Underground.

Retaining destination information on signs and digital touchpoints (i.e to Stratford) – this will help implementation, as customers familiarise themselves with the new names and design to have information that they recognise.

Communicating the changes:

Transition period should run for quite a long time to allow people to build mental association with new approach, 'used to be called', 'now called' – important for a) familiar/frequent users who don't check customer information as frequently; b) infrequent users (people coming into London less regularly).

Encouragement of a big push on customer communications and engagement, as this will be a drastic change for customers to get used to and will be needed as early as possible to allow time for familiarity – a range of channels and methods to capture all London Overground customers including groups like Age UK etc.

Agreed on an IDAG sponsor for the project EqIA.

4 March 2024: Inclusive Transport Forum

The forum recommended that publicity surrounding the naming and new colours be in accessible formats, including easy read, British Sign Language and alt-text/voice overs on videos.

The forum also requested that accessible versions/information be available at the same time as generic versions/information, noting that there is too often a delay or a need to request this from TfL after the fact. This should be done pre-emptively.

There was interest in whether third-party apps would also be carrying the new information, whether they would be doing so accessibly, and how TfL is adapting designs for technology that is continually changing.

Impact assessment – protected characteristics and inclusion groups

Given the evidence listed in the evidence base and engagement and consultation sections, consider and describe the potential impacts this work could have on people with protected characteristics and other inclusion groups.

Characteristic	Employee	Customer	Positive	Neutral	Negative	No impact
Race and ethnicity		Y	Y		Y	
Sex		Y	Y		Y	
Gender reassignment		Y	Y		Y	
Religion and belief		Y	Y		Y	
Disability		Y	Y		Y	
Sexual orientation		Y	Y		Y	
Marriage or civil partnership		Y	Y		Y	
Pregnancy and maternity		Y	Y		Y	
Disadvantaged, inclusion groups and communities		Y	Y		Y	
Deprivation and socio-economic disadvantage of local communities		Y	Y		Y	

Positive project impacts

The following are potential positive impacts of this project and the protected characteristics affected.

Wayfinding and navigation – All characteristics affected

Expanding the use of colour and name branding to the London Overground will make it simpler for customers to navigate what is currently a complex integrated network. Improving navigation will increase our customers' confidence to travel and create a more positive customer experience.

Using a colour and naming strategy creates additional recognition markers for customers to follow as they plan and execute their journeys. Instead of relying solely on geographical text markers, customers will be able to utilise colours and clearly identifiable names as they travel around our network.

This will be particularly beneficial at key decision points, such as complex interchanges where multiple travel options are available, including multiple London Overground services. Differentiating between the London Overground services available will improve navigation and reduce customer confusion, especially for unfamiliar users.

Differentiating between the London Overground lines will also allow customers to visualise the coverage of the network and how it interacts with other key transport options, therefore expanding network comprehension and opening up potential journey options.

While we are updating the wayfinding signs, we can improve the maintenance of out-of-date, or inconsistent signs, bringing the network up to a best practice standard. There are currently different versions and designs depending on the train operating company managing the station, these updates will remove those inconsistencies. This will help customers navigate seamlessly through a full journey from train to platform, ticket hall and on to their onward destination.

Wayfinding and navigation – Disability and Age characteristics affected

The project will be an opportunity to improve any signs for protected characteristics at all 113 London Overground stations, such as updating accessible signs to our current 2023 standards.

Communication – All characteristics affected

Branding and naming the lines will enable TfL to communicate more effectively with customers by pinpointing the exact line and location the disruption is occurring, we will be able to give more accurate and helpful real-time information. This will give customers a better understanding of service disruption, whether this will impact their specific journey, and allow customers to make alternative arrangements if necessary.

Project risks and potential negative impacts

The following are potential negative impacts of this project and the protected characteristics affected.

All impacts identified have been, or will be, mitigated against, to ensure the best experience possible for customers. All impacts and their mitigations are listed in full.

Customer confusion as the information is updated across the network – All characteristics affected

Impact

The project will reveal the updated customer information staggered over a period of a week, creating a situation where the network will have some updated customer information and some legacy customer information on display.

Having some customer information with the new line name/colours completed and some not completed, may cause confusion for customers in the short term.

Mitigations

At the procurement stage for the signs, one of the key considerations needs to be the contractor's ability to provide a detailed project plan, with achievable timelines, and to be able to reliably stick to the specific time frames. It is essential that the project has a strict, clear and attainable project programme, which needs to be agreed with the contractor and all TfL touchpoint owners.

Permanent signs with temporary vinyl overlays will be installed before launch to enable as short a reveal period as possible. Maps and announcements on London Overground trains, and maps in stations will be changed over first. The signs in London Overground stations will be revealed over a period of one week. Digital channels such as TfL Go and Journey Planner will be changed over mid-way through the week to allow for snagging issues to be resolved before go-live. We will introduce a customer information poster at stations explaining the staggered reveal.

Customer communications will explain the roll-out and introduce customers to their new lines at a point when they will see the majority of customer information switched over. Customer communications will be delivered in a variety of formats to ensure that visually impaired, hearing impaired, and neurodiverse customers can access the information.

To support customers during the transition period, Arriva Rail London and TfL staff will be fully briefed on the changes, and how this will impact customer information, so they are able to relay this to customers coherently. Operational Readiness will prepare a staff knowledge pack and disseminate this in different formats across all staff, including our train operating partners which interchange with London Overground services.

Design feels too removed from current branding, causing customer confusion – All characteristics affected

If our design is too different from the current London Overground branding, some customers may find this hard to understand, and so initially find travelling on the London Overground difficult.

Mitigation

The project will mitigate this by keeping the orange London Overground branding at key touchpoints, such as on platform roundels and the roundel on overhead signs. On map products, the 'white gap' will be kept indicating a London Overground service and is in line with other TfL rail designs (DLR, Elizabeth line).

Additional colours and names create hard-to-read customer information products – Disability (visual impairment) and Age characteristics affected

The Tube map is already very busy, and adding six new line colours and names to this has the potential to make it more difficult to read. Additionally, new line colours may overlap with existing similar line colours and it may be difficult for customers to differentiate between the lines, particularly if they have a visual impairment.

Particular products, such as the pocket Tube map found as a leaflet in stations, will be particularly hard to read due to their size restrictions.

Mitigation

The project has carefully considered the line colours to ensure there is enough colour contrast to distinguish which line customers are looking at and enable them to follow the map easily. We have collaborated with visually impaired customers to trial colours across customer information products, including maps and vitreous enamel signs, for visual contrast and to check the new colours do not interfere with existing line colours.

The map key will separate 'London Underground' and 'London Overground' lines under different headings – making it clearer for customers and keep the London Overground brand identity. The black and white Tube map will be included in updates, as the London Overground currently uses a parallel line for the whole network.

TfL Go will display the colour and line name on the digital map as appropriate. On TfL Journey Planner, the new line name and colours will be referenced together at all times. In-train and on-station information will always use a combination of the London Overground roundel, line name and colour to deliver multiple access points to the information. TfL Go also has a number of specific journey planning options and accessibility features to enable great legibility (See Appendix 2). TfL Go is a good option for customers who are not digitally excluded.

The Pocket Tube map remains a useful product for many of our customers, despite the crowded nature of the map. However, for customers who are unable to read a Pocket Tube map, TfL has other, more accessible products available, such as the large print Tube map, or the step-free Tube guide which customers can ask staff for in stations, order online, or through the contact centre – TfL also uploads all map

products online, where customers can use the accessibility features to make the map larger.

Mitigation

Visual discomfort due to use of parallel lines – Disability characteristic affected

The design proposal for the signs is for the new line colour not to be block colour, like the existing signs; instead this will be two stripes with a white space in between, which research suggests has the potential to cause visual discomfort when viewing signs.

Mitigation

When signing off the final design, the project tested prototype signs with IDAG and other disability groups to ensure the proposal didn't cause visual discomfort for customers. We did this through a virtual reality video asset, as well as in-station visits.

Interchange customer information not being updated at launch may cause customer confusion – All characteristics affected

Under the current scope, interchange signs, including line diagrams and audio announcements on London Underground lines and other TfL modes (DLR, Elizabeth line, London Trams) will not change and will remain branded as 'London Overground' with an orange flag-box.

The inconsistency across modes may make it more confusing for customers, who look for specific line names across digital and London Overground wayfinding touchpoints.

Mitigation

The project created a virtual reality video to travel from Euston to Hackney Wick via Highbury & Islington to capture all signs and touchpoints to show how customers will be able to navigate. This has been used to consult and validate the approach with stakeholders and City Hall to ensure the customer journey can easily be navigated.

The project will work together to ensure the London Overground branding is retained across all touchpoints to minimise confusion, and to allow customers to follow their journey through from journey planning to finding the platform at the station.

The project has also used the asset to test the new design with customers, including disabled, older and customers whose first language is not English. The virtual reality asset will include audio on-train announcements on a Victoria line and London Overground train to highlight what customers will hear, as well as see with signs, printed maps and customer information posters.

Third-party apps retaining old branding may cause customer confusion – All characteristics affected

Our stakeholder consultations highlighted that many disabled customers rely heavily on third-party apps to assist them when travelling, as they often have more detailed, granular information that can assist disabled customers on their journey.

The design, colours and names will need to change on these third-party apps (such as City Mapper, Google Maps and Station Master) as well as TfL Go and Journey

Planner. There is no guarantee that these apps will use the new TfL design, or the implementation may take a long time, or cause glitches.

Mitigation

The project engaged with all third-party apps (including specific accessibility apps) to inform them of the changes and the importance of adopting the new design and names for continuity for customers.

A guidance document was provided by the TfL Digital team on the new design and communication channels opened for queries and guidance.

Use of old and new branding internally may affect operational processes – All characteristics affected

Changing the line names of the London Overground has the potential to cause a disconnect between customer-facing and internal system names for TfL staff, customers, and external stakeholders such as British Transport Police, which may be an issue if there is hate crime on the network targeting women, Black, Asian and minority ethnic, LGBTQ+ or disabled customers (see evidence section which highlights there are higher instances of hate crime among these groups).

Mitigation

All staff including TfL, Arriva Rail London and British Transport Police and help points (which get routed to National Rail enquiries) need to be clearly briefed when the new line names are implemented, so that there is consistency and understanding with both staff and customers, which is imperative for customer safety. For example, when customers are reporting an issue (hate crime or abuse), staff are clear as to the exact location with the correct station and line name, and also the correct new colours associated with that line. Communication and terminology between all organisations need to be clearly defined prior to project completion.

Staff training and briefings should be given in a variety of formats, to ensure that all employees, including those that are neurodivergent and find it difficult to learn new information quickly, or process information in written format can adapt and learn the new line names and have full knowledge to be able to help customers. This could be online training, in person briefings, video format, written briefings/manual guide.

The information should also be re-iterated and repeated at team meetings, which will help to reinforce knowledge. Following the press event, it will be some months before the signs start to change, which should allow enough time for staff familiarisation.

Action planning

List all planned actions – actions that could help mitigate any potential negative impacts. Additionally, please remember to include in your plan any ‘positive action’.

1. Review the [London Overground sign design standards](#) and agree new standards for the way each type of sign should look. Consider information provided in Design for the Mind. Owner: Design, deadline: September 2023 (Complete)
2. Digital design standards review and understanding of Digital timelines. Owner: UX, deadline: June 2023 (Complete)
3. Workshop with all touchpoint owners to agree approach and consistency across all touchpoints – how should the project be rolled out to ensure the least disruption and confusion for customers. Owner: Customer Information and Customer Experience. Deadline: June 2023 (Complete)
4. Create virtual reality video asset to help finalise the design and see whether our sign touchpoint strategy works in a live station environment. Owner: Customer Information, Customer Experience, Design, Sponsor. Deadline: August 2023 (Complete)
5. Test customer information products across touchpoints with IDAG and other accessibility stakeholders. Owner: Customer Information, Customer Experience, Design. Deadline: March 2024 (Complete)
6. Create knowledge document for staff and external partners. Owner: Operational Readiness: Deadline: June 2024 (Complete)

Monitoring and evaluation

Monitoring the success of mitigating actions once the proposal has been implemented, will be undertaken through:

- Customer Satisfaction Surveys
- Mystery Shopper Surveys
- Contact via TfL Customer Services

How would you monitor the actual impact of your proposal or decision once your proposal has been implemented?

Monitoring the actual impact of the decision once the proposal has been implemented will be undertaken through:

- Customer Contact Centre data (complaints and feedback)
- Customer Satisfaction Surveys
- Staff feedback
- Site visits to:
 - Observe customer behaviour and how they interact with customer information
 - How many customers need to rely on staff for clarification/assistance
 - Whether customers look visibly confused or whether it's a smooth and seamless journey

Decision making

Based on the above assessment, please select one of the options below that describe what you propose to do next. It is important that you provide the reason(s) for your decision and the evidence that supported these reasons.

- ~~1. Continue with your work because the assessment demonstrates that the work will have no potential negative or adverse impact on equality and inclusion groups.~~

~~[Replace this with explanation if relevant]~~

2. Justify and continue with your work despite negative equality impacts, and because there are other factors which make it reasonable for you to decide to continue with your work.

Despite the potential of negative impacts on customers, we will continue with this project, as the overall project aims to benefit customers and to hopefully improve the existing information provisions available across the London Overground network.

~~[Replace this with explanation if relevant]~~

- ~~3. Change or adapt your work to ensure it does not adversely or disproportionately impact certain groups of people, communities, or miss opportunities to affect them positively~~

~~[Replace this with explanation if relevant]~~

- ~~4. Stop your work because there is a high probability of noticeable discrimination and negative impacts which cannot be objectively justified. Further research work may be needed.~~

~~[Replace this with explanation if relevant]~~

Document history and version control:

Version	Date	Summary of changes
0.1	02/10/2023	First draft
0.2	13/03/2024	Second draft to take account of colour blind FOI
0.3	29/05/2024	Third draft to make into an accessible document
0.4	05/09/2024	Fourth draft to change format for accessibility