

**Equality scheme for the
Northern Ireland Transport Holding Company**

***Drawn up in accordance with Section 75 and Schedule 9 of the Northern
Ireland Act 1998***



***Approved by the Equality Commission for Northern Ireland
on 27th February 2013***

The Northern Ireland Transport Holding Company is a designated body for the purposes of Section 75, but all references to NITHC in this report should be taken to include Translink which is a trading name used by any one or more of the following companies under the ultimate ownership of NITHC. The Group comprises:-

- ***Citybus Limited (which also trades as Metro)***
- ***Flexibus Limited***
- ***NIR Travel Limited***
- ***Northern Ireland Railways Company Limited***
- ***Ulsterbus Limited***
- ***Translink (NI) Limited***
- ***Travel NI Limited.***

Foreword

Section 75 of the Northern Ireland Act 1998 (the Act) requires public authorities, in carrying out their functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity and regard to the desirability of promoting good relations across a range of categories outlined in the Act¹.

In our equality scheme we set out how the Group proposes to fulfill the Section 75 statutory duties.

We will commit the necessary resources in terms of people, time and money to make sure that the Section 75 statutory duties are complied with and that the equality scheme is implemented effectively, and on time.

We commit to having effective internal arrangements in place for ensuring our effective compliance with the Section 75 statutory duties and for monitoring and reviewing our progress.

We will develop and deliver a programme of communication and training with the aim of ensuring that all our staff and board members are made fully aware of our equality scheme and understand the commitments and obligations within it. We will develop a programme of awareness raising for our consultees on the Section 75 statutory duties and our commitments in our equality scheme.

We, The Chairman and the Group Chief Executive are fully committed to effectively fulfilling our Section 75 statutory duties across all our functions (including service provision, employment and procurement) through the effective implementation of our equality scheme.

We realise the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our equality scheme demonstrates how determined we are to ensure there are opportunities, for people affected by our work, to positively influence how we carry out our functions in line with our Section 75 statutory duties. It also offers the means whereby persons directly affected by what they consider to be a failure, on our part, to comply with our equality scheme, can make complaints.

On behalf of the Group and our staff we are pleased to support and endorse this equality scheme which has been drawn up in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998 and Equality Commission guidelines.

¹ See section 1.1 of our Equality Scheme.

*Mr John Trethowan
Chairman*

*Mrs Catherine Mason
Group Chief Executive*

Date:

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Chapter 1 Introduction

Section 75 of the Northern Ireland Act 1998

1.1 Section 75 of the Northern Ireland Act 1998 (the Act) requires the Northern Ireland Transport Holding Company to comply with two statutory duties:

Section 75 (1)

In carrying out our functions relating to Northern Ireland we are required to have due regard to the need to promote equality of opportunity between

- persons of different religious belief, political opinion, racial group, age, marital status or sexual orientation
- men and women generally
- persons with a disability and persons without
- persons with dependents and persons without.

Section 75 (2)

In addition, without prejudice to the obligations above, in carrying out our functions in relation to Northern Ireland we are required to have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

“Functions” include the “powers and duties” of a public authority². This includes our employment and procurement functions.

Please see below under “Who we are and what we do” for a detailed explanation of our functions.

How we propose to fulfill the Section 75 duties in relation to the relevant functions of The Group.

1.2 Schedule 9 4. (1) of the Act requires NITHCo as a designated public authority to set out in an equality scheme how it proposes to fulfil the duties imposed by Section 75 in relation to its relevant functions. This equality scheme is intended to fulfil that statutory requirement. It is both a statement of our arrangements for fulfilling the Section 75 statutory duties and our plan for their implementation.

1.3 The Northern Ireland Transport Holding Company is committed to the discharge of our Section 75 obligations in all parts of our organisation and we will commit the necessary resources in terms of people, time and money to ensure that the Section 75 statutory duties are complied with and that our equality scheme can be implemented effectively.

² Section 98 (1) of the Northern Ireland Act 1998.

Who we are and what we do

Northern Ireland Transport Holding Company (NITHC) is a public corporation established under the Transport Act (NI) 1967 to oversee the provision of public transport in Northern Ireland. It took over the railway and bus activities of the Ulster Transport Authority (UTA), thus, Northern Ireland Railways and Ulsterbus were incorporated.

In 1973 Citybus (now Metro) was incorporated to take over the bus services of the Belfast Corporation Transport Department. Translink is a brand name which was introduced in late 1996 to cover the integrated services of Ulsterbus, Citybus (now Metro) and Northern Ireland Railways. The Group currently employ 3899 staff throughout Northern Ireland.

The Board of Northern Ireland Transport Holding Company is responsible to the Department for Regional Development for the operation of its subsidiary companies, Citybus, NI Railways and Ulsterbus, which deliver public transport services.

NITHC has a wide range of duties and functions which include:

- Approving the strategic direction of the operating companies
- Ensuring governance within the operating companies in terms of property.
- Managing the portfolio investment throughout the Group.

The Chairmanship of NITHC is a non-executive position appointed by Government and like the other Non-Executive Directors is appointed for a renewable term of 3 years.

Procurement throughout the Group is conducted as part of the Centre of Procurement Expertise (COPE's).

Chapter 2: Our arrangements for assessing our Compliance with the section 75 duties.

(Schedule 9 4. (2) (a))

2.1 Some of our arrangements for assessing our compliance with the Section 75 statutory duties are outlined in other relevant parts of this equality scheme at:

- Chapter 3 (Page 14)
- Chapter 4 (Page 19)
- Chapter 6 (Page 32)
- Chapter 8 (Page 35)

- Chapter 10 (Page 39), and
- Appendix 4 (Pages 47 & 48)

In addition we have the following arrangements in place for assessing our compliance with the Section 75 statutory duties:

Responsibilities and reporting

2.2 We are committed to the fulfilment of our Section 75 obligations in all parts of our work.

2.3 Responsibility for the effective implementation of the equality scheme lies at NITHC Board level. The Equality Working Group is accountable to the Board and has oversight of the development, implementation, maintenance and review of the equality scheme in accordance with Section 75 and Schedule 9 of the Northern Ireland Act 1998, including any good practice or guidance that has been or may be issued by the Equality Commission.

2.4 If you have any questions or comments regarding our equality scheme, please contact in the first instance the Head of Corporate Services at the address given below and we will respond to you as soon as possible:

Mrs. Catherine Burns
Head of Corporate Services
Chamber of Commerce House
22 Great Victoria Street
Belfast
BT2 7LX
Tel: 02890 243456
Fax: 02890 333845
Text phone: 02890 387505 (Connects to the Translink Call Centre)
Email: catherine.burns@translink.co.uk

2.5 Objectives and targets relating to the statutory duties will be integrated into our Corporate Plan.³

2.6 Employees' job descriptions and performance plans reflect their contributions to the discharge of the Section 75 statutory duties and implementation of the equality scheme, where relevant. The personal performance plans are subject to appraisal in the annual performance review.

³ See Appendix 4 'Timetable for measures proposed' and section 2.11 of this equality scheme.

2.7 The Northern Ireland Transport Holding Company prepares an annual report on the progress we have made on implementing the arrangements set out in this equality scheme to discharge our Section 75 statutory duties (Section 75 annual progress report).

The Section 75 annual progress report will be sent to the Equality Commission by 31 August each year and will follow any guidance on annual reporting issued by the Equality Commission.

Progress on the delivery of Section 75 statutory duties will also be included in our (Group) annual report.

2.8 The latest Section 75 annual progress report is available on our website www.translink.co.uk or by contacting the above named person in section 2.4.

2.9 NITHC liaises closely with the Equality Commission to ensure that progress on the implementation of our equality scheme is maintained.

2.10 The Equality Scheme published in September 2005 stated:

The Group's arrangements for assessing compliance with its duties as described under Section 75 of the Northern Ireland Act 1998 are:

- NITHC is committed to fulfil its section 75 obligations in all parts of its work. Statutory responsibility for the effective implementation lies with the Board of NITHC.
- The Head of Corporate Services will be accountable to the Board for the development, maintenance and review of the Equality Scheme in accordance with the legislation, including any good practice or guidance that may be issued by the Equality Commission.
- The Head of Corporate Services will be the central point of contact with the Equality Commission, for consultation exercises and for complaints under the scheme.
- The Head of Corporate Services will report regularly to the Board on the progress made in implementing the Equality Scheme and respond to any queries from those affected by the statutory duties
- Objectives and targets relating to the Section 75 duties will be integrated into corporate strategies and operational plans as appropriate and will be reflected at all levels of strategic planning within the group. Achievement against them will be monitored and reported to the Board every 3 months.

Initially the targets will relate to implementation of the approved Equality Scheme, but they will be reviewed annually to reflect objectives identified as the implementation of the scheme progresses. It is envisaged that consultation, EQIA's and monitoring, in particular, will assist in identifying more focused targets leading to greater effectiveness in promoting equality of opportunity and good relations.

- Implementation of Section 75 duties will be included in the personal performance plans of all staff that are directly engaged in this work and will be reviewed through our performance review arrangements. In addition, a commitment to the statutory duties will be included in all job descriptions.
- The implementation of the equality scheme is a task that has developed so that all departments have a key role to meet equality issues as they arise.
- The Equality Working Group has been in place since the implementation of our initial equality scheme with members from key business areas including Human Resources, Bus operations and Marketing meeting on a regular basis to discuss any new guidance and good practice.

The Group also have staff representatives in the following groups and forums:

- Section 75 Reference Group – which is a group that was formed with various community, statutory and voluntary organisations. The group meets at least once per year to discuss any issues that may have arisen. The group is also asked to comment and report on aspects of Translink policies that may cause concern for the groups that they represent.
- IMTAC - Translink has regular liaison meetings with IMTAC regarding the accessibility of services to disabled people. In the past IMTAC have provided input into new initiatives that have importance to disabled people.
- Area User Groups - We currently have 10 passenger groups: 6 for bus and 4 for rail. The groups are broken down by area for the bus groups and by line for the rail groups. Each group contains a maximum of 12 members, made of regular passengers, ensuring the demographic is representative of all passengers. Groups meet three times per year and also provide feedback throughout the year by posting in comment forms on a regular basis to report any issues they see while traveling.
- Translink Youth Forum - We have set up a Youth Forum for young people aged between 11 and 23 so we can listen to their views about and

experiences of our services. These groups meet quarterly to discuss the services we currently provide.

- Greater Belfast Seniors Forum - Translink officers have regular meetings with this group. We have gained valuable insight into the issues faced by older people when using public transport. Translink intend to use this input when developing future services.

Action plan/action measures

2.11 NITHC has developed an action plan to promote equality of opportunity and good relations. This action plan is set out in Appendix 6 to this equality scheme.

2.12 The action measures that will make up our action plan will be relevant to our functions. They will be developed and prioritised on the basis of an audit of inequalities. The audit of inequalities will gather and analyse information across the Section 75 categories⁴ to identify the inequalities that exist for our service users and those affected by our policies⁵.

2.13 Action measures will be specific, measurable, linked to achievable outcomes, realistic and time bound. Action measures will include performance indicators and timescales for their achievement.

2.14 We will develop any action plans for a period of between one and five years in order to align them with our corporate and business planning cycles. Implementation of the action measures will be incorporated into our business planning process.

2.15 We will seek input from our stakeholders and consult on our action plan before we send it to the Equality Commission and thereafter when reviewing the plan as per 2.16 below.

2.16 We will monitor our progress on the delivery of our action measures annually and update the action plan as necessary to ensure that it remains effective and relevant to our functions and work.

2.17 The Northern Ireland Transport Holding Company will inform the Commission of any changes or amendments to our action plan and will also include this information in our Section 75 annual progress report to the Commission. Our Section 75 annual progress report will incorporate information on progress we have made in implementing our action plans/action measures.

⁴ See section 1.1 of this equality scheme for a list of these categories.

⁵ See section 4.1 of this equality scheme for a definition of policies.

2.18 Once finalised, our action plan will be available at www.translink.co.uk. If you require it in an alternative format we have numerous other mechanisms in place including:

- Text phone
- RNID type talk system
- Braille and audio

These communication methods are available on the website which is fully accessible as this was designed in consultation with disability organisations.

Chapter 3 Our arrangements for consulting

(Schedule 9 4. (2) (a)) - on matters to which a duty (S75 (1) or (2)) is likely to be relevant (including details of the persons to be consulted).

(Schedule 9 4. (2) (b)) on the likely impact of policies adopted or proposed to be adopted by us on the promotion of equality of opportunity.

3.1 We recognise the importance of consultation in all aspects of the implementation of our statutory equality duties. We will consult on our equality scheme, action measures, equality impact assessments and other matters relevant to the Section 75 statutory duties.

3.2 We are committed to carrying out consultation in accordance with the following principles (as contained in the Equality Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*')

3.2.1 All consultations will seek the views of those directly affected by the matter/policy, the Equality Commission, representative groups of Section 75 categories, other public authorities, voluntary and community groups, our staff and their trades unions and such other groups who have a legitimate interest in the matter, whether or not they have a direct economic or personal interest.

Initially all consultees (see Appendix 3), as a matter of course, will be notified (by email or post) of the matter/policy being consulted upon to ensure they are aware of all consultations. Thereafter, to ensure the most effective use of our and our consultees' resources, we will take a targeted approach to consultation for those consultees that may have a particular interest in the matter/policy being consulted upon and to whom the matter/policy is of particular relevance. This

may include for example regional or local consultations, sectoral or thematic consultation etc.

3.2.2 Consultation with all stakeholders will begin as early as possible. We will engage with affected individuals and representative groups to identify how best to consult or engage with them. We will ask our consultees what their preferred consultation methods are and will give consideration to these. Methods of consultation could include:

- Face-to-face meetings
- Focus groups
- Written documents with the opportunity to comment in writing
- Questionnaires
- Information/notification by email with an opportunity to opt in/opt out of the consultation
- Internet discussions or
- Telephone consultations.

This list is not exhaustive and we may develop other additional methods of consultation more appropriate to key stakeholders and the matter being consulted upon.

3.2.3 We will consider the accessibility and format of every method of consultation we use in order to remove barriers to the consultation process. Specific consideration will be given as to how best to communicate with children and young people, people with disabilities (in particular people with learning disabilities) and minority ethnic communities. We take account of existing and developing good practice, including the Equality Commission's guidance *Let's Talk Let's Listen – Guidance for public authorities on consulting and involving children and young people (2008)*.

Information will be made available, on request, in alternative formats⁶, in a timely manner, usually within 20 days. We will ensure that such consultees have equal time to respond.

3.2.4 Specific training has been provided to those facilitating consultations to ensure that they have the necessary skills to communicate effectively with consultees.

3.2.5 To ensure effective consultation with consultees⁷ on Section 75 matters, we will develop a programme of awareness raising on the Section 75 statutory duties and the commitments in our equality scheme by undertaking the following:

⁶ See Chapter 6 of our equality scheme for further information on alternative formats of information we provide.

- Circulation of a link by e-mail and alternative format if requested to all consultees to the final Equality scheme and Action Plan within one month of approval by the Equality Scheme.
- The issue of a press release when the Equality Scheme is approved.
- Holding of our annual section 75 reference group with various organisations that represent section 75 groups to review and discuss the equality scheme and action plan.
- Arranging pre-consultation meetings with key stakeholders and the equality commission (if required) to discuss specific policies.
- Updating of our website as appropriate giving information on our statutory duties, commitments and detailing of any on-going equality issues.

3.2.6 The consultation period lasts for a minimum of twelve weeks to allow adequate time for groups to consult amongst themselves as part of the process of forming a view. However, in exceptional circumstances when this timescale is not feasible (for example implementing EU Directives or UK wide legislation, meeting Health and Safety requirements, addressing urgent public health matters or complying with Court judgements), we may shorten timescales to eight weeks or less before the policy is implemented. We may continue consultation thereafter and will review the policy as part of our monitoring commitments⁸.

Where, under these exceptional circumstances, we must implement a policy immediately, as it is beyond our authority's control, we may consult after implementation of the policy, in order to ensure that any impacts of the policy are considered.

3.2.7 If a consultation exercise is to take place over a period when consultees are less able to respond, for example, over the summer or Christmas break, or if the policy under consideration is particularly complex, we will give consideration to the feasibility of allowing a longer period for the consultation.

3.2.8 We are conscious of the fact that affected individuals and representative groups may have different needs. We will take appropriate measures to ensure full participation in any meetings that are held. We will consider for example the time of day, the appropriateness of the venue, in particular whether it can be accessed by those with disabilities, how the meeting is to be conducted, the use of appropriate language, whether a signer and/or interpreter is necessary, and whether the provision of childcare and support for other carers is required.

3.2.9 We make all relevant information available to consultees in appropriate formats to ensure meaningful consultation. This includes detailed information on

⁷ Please see Appendix 3 for a list of our consultees.

⁸ Please see below at 4.27 to 4.31 for details on monitoring.

the policy proposal being consulted upon and any relevant quantitative and qualitative data.

3.2.10 in making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy.

3.2.11 we provide feedback to consultees in a timely manner. A feedback report is prepared which includes summary information on the policy consulted upon, a summary of consultees' comments and a summary of our consideration of and response to consultees' input. The feedback is provided in formats suitable to consultees. (Please see also 6.3)

3.3 A list of our consultees is included in this equality scheme at Appendix 3 can also be obtained from our website at:

www.translink.co.uk

Or by using the contact details referenced on Page 8 of this scheme.

3.4 Our consultation list is not exhaustive and is reviewed on an annual basis to ensure it remains relevant to our functions and policies.

We welcome enquiries from any person/s or organisations wishing to be added to the list of consultees. Please contact our equality officer as detailed in point 3.3 above to provide your contact details and have your areas of interest noted or have your name/details removed or amended. Please also inform us at this stage if you would like information sent to you in a particular format or language.

Chapter 4: Our arrangements for assessing, Monitoring and publishing the impact of policies

(Schedule 9 4. (2) (b); Schedule 9 4. (2) (c); Schedule 9 4. (2) (d);

Schedule 9 9. (1); Schedule 9 9. (2))

Our arrangements for assessing the likely impact of policies adopted or proposed to be adopted on the promotion of equality of opportunity

(Schedule 9 4. (2) (b))

4.1 In the context of Section 75, 'policy' is very broadly defined and it covers all the ways in which we carry out or propose to carry out our functions in relation to Northern Ireland. In respect of this equality scheme, the term policy is used for any (proposed/amended/existing) strategy, policy initiative or practice and/or decision, whether written or unwritten and irrespective of the label given to it, e.g., 'draft', 'pilot', 'high level' or 'sectoral'.

4.2 In making any decision with respect to a policy adopted or proposed to be adopted, we take into account any assessment and consultation carried out in relation to the policy, as required by Schedule 9 9. (2) of the Northern Ireland Act 1998.

4.3 The Group uses the tools of **screening** and **equality impact assessment** to assess the likely impact of a policy on the promotion of equality of opportunity and good relations. In carrying out these assessments we will relate them to the intended outcomes of the policy in question and will also follow Equality Commission guidance:

- the guidance on screening, including the screening template, as detailed in the Commission's guidance '*Section 75 of the Northern Ireland Act 1998 – A Guide for Public Authorities (April 2010)*' and
- on undertaking an equality impact assessment as detailed in the Commission's guidance '*Practical guidance on equality impact assessment (February 2005)*'.

Screening

4.4 The purpose of screening is to identify those policies that are likely to have an impact on equality of opportunity and/or good relations.

4.5 Screening is completed at the earliest opportunity in the policy development/review process. Policies which we propose to adopt will be subject

to screening prior to implementation. For more detailed strategies or policies that are to be put in place through a series of stages, we will screen at various stages during implementation.

4.6 The lead role in the screening of a policy is taken by the policy decision maker who has the authority to make changes to that policy. However, screening will also involve other relevant team members, for example, equality specialists, those who implement the policy and staff members from other relevant work areas. Where possible we will include key stakeholders in the screening process.

4.7 The following questions are applied to all our policies as part of the screening process:

- What is the likely impact on equality of opportunity for those affected by this policy, for each of the Section 75 equality categories? (minor/major/none)
- Are there opportunities to better promote equality of opportunity for people within the Section 75 equality categories?
- To what extent is the policy likely to impact on good relations between people of a different religious belief, political opinion or racial group? (minor/major/none)
- Are there opportunities to better promote good relations between people of a different religious belief, political opinion or racial group?

4.8 In order to answer the screening questions, we gather all relevant information and data, both qualitative and quantitative. In taking this evidence into account we consider the different needs, experiences and priorities for each of the Section 75 equality categories. Any screening decision will be informed by this evidence.

4.9 Completion of screening, taking into account our consideration of the answers to all four screening questions set out in 4.7 above, will lead to one of the following three outcomes:

1. the policy has been 'screened in' for equality impact assessment
2. the policy has been 'screened out' with mitigation⁹ or an alternative policy proposed to be adopted

⁹ Mitigation – Where an assessment (screening in this case) reveals that a particular policy has an adverse impact on equality of opportunity and / or good relations, a public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories.

3. the policy has been 'screened out' without mitigation or an alternative policy proposed to be adopted.

4.10 If our screening concludes that the likely impact of a policy is 'minor' in respect of one, or more, of the equality of opportunity and/or good relations categories, we may on occasion decide to proceed with an equality impact assessment, depending on the policy. If an EQIA is not to be conducted we will nonetheless consider measures that might mitigate the policy impact as well as alternative policies that might better achieve the promotion of equality of opportunity and/or good relations.

Where we mitigate we will outline in our screening template the reasons to support this decision together with the proposed changes, amendments or alternative policy.

This screening decision will be 'signed off' by the appropriate policy lead within the Group.

4.11 If our screening concludes that the likely impact of a policy is 'major' in respect of one, or more, of the equality of opportunity and/or good relations categories, we will normally subject the policy to an equality impact assessment. This screening decision will be 'signed off' by the appropriate policy lead within the Group.

4.12 If our screening concludes that the likely impact of a policy is 'none', in respect of all of the equality of opportunity and/or good relations categories, we may decide to screen the policy out. If a policy is 'screened out' as having no relevance to equality of opportunity or good relations, we will give details of the reasons for the decision taken. This screening decision will be 'signed off' by the appropriate policy lead within the Group.

4.13 As soon as possible following the completion of the screening process, the screening template, signed off and approved by the senior manager responsible for the policy, will be made available on our website

www.translink.co.uk

And on request or by using the contact details referenced on Page 8 of this scheme.

4.14 If a consultee, including the Equality Commission, raises a concern about a screening decision based on supporting evidence, we will review the screening decision.

4.15 Our screening reports are published quarterly [see below at 4.20 - 4.22 and 4.23 for details].

Equality impact assessment

4.16 An equality impact assessment (EQIA) is a thorough and systematic analysis of a policy, whether that policy is formal or informal, and irrespective of the scope of that policy. The primary function of an EQIA is to determine the extent of any impact of a policy upon the Section 75 categories and to determine if the impact is an adverse one. It is also an opportunity to demonstrate the likely positive outcomes of a policy and to seek ways to more effectively promote equality of opportunity and good relations.

4.17 Once a policy is screened and screening has identified that an equality impact assessment is necessary, we will carry out the EQIA in accordance with Equality Commission guidance. The equality impact assessment will be carried out as part of the policy development process, before the policy is implemented.

4.18 Any equality impact assessment will be subject to consultation at the appropriate stage(s). (For details see above Chapter 3 “Our Arrangements for Consulting”).

Our arrangements for publishing the results of the assessments of the likely impact of policies we have adopted or propose to adopt on the promotion of equality of opportunity

(Schedule 9 4. (2) (d); Schedule 9 9. (1))

4.19 We make publicly available the results of our assessments (screening and EQIA) of the likely impact of our policies on the promotion of equality of opportunity and good relations.

What we publish

4.20 Screening reports

These are published quarterly. Screening reports detail:

- All policies screened by the Group over the three month period
- A statement of the aim(s) of the policy/policies to which the assessment relates
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity;

- Screening decisions, i.e.:
 - whether the policy has been ‘screened in’ for equality impact assessment.
 - whether the policy has been ‘screened out’ with mitigation or an alternative policy proposed to be adopted.
 - whether the policy has been ‘screened out’ without mitigation or an alternative policy proposed to be adopted.
- Where applicable, a timetable for conducting equality impact assessments
- A link to the completed screening template(s) on our website

4.21 Screening templates

For details on the availability of our screening templates please refer to 4.13.

4.22 Equality impact assessments

EQIA reports are published once the impact assessment has been completed. These reports include:

- A statement of the aim of the policy assessed
- Information and data collected
- Details of the assessment of impact(s)
- Consideration given to measures which might mitigate any adverse impact
- Consideration given to alternative policies which might better achieve the promotion of equality of opportunity
- Consultation responses
- The decision taken
- Future monitoring plans.

How we publish the information

4.23 All information we publish is accessible and can be made available in alternative formats on request. Please see 6.3 below.

Where we publish the information

4.24 The results of our assessments (screening reports and completed templates, the results of equality impact assessments) are available on our website

www.translink.co.uk

Or by using the contact details referenced on Page 8 of this scheme.

4.25 In addition to the above, screening reports (electronic link or hard copy on request if more suitable for recipients) which include all policies screened over a 3 month period is also sent directly to all consultees on a quarterly basis.

4.26 We will inform the general public about the availability of this material through communications such as press releases where appropriate.

Our arrangements for monitoring any adverse impact of policies we have adopted on equality of opportunity

(Schedule 9 4. (2) (c))

4.27 Monitoring can assist us to deliver better public services and continuous improvements. Monitoring Section 75 information involves the processing of sensitive personal data (data relating to the racial or ethnic origin of individuals, sexual orientation, political opinion, religious belief, etc.). In order to carry out monitoring in a confidential and effective manner, the Group follows guidance from the Office of the Information Commissioner and the Equality Commission.

4.28 We monitor any adverse impact on the promotion of equality of opportunity of policies we have adopted. We are also committed to monitoring more broadly to identify opportunities to better promote equality of opportunity and good relations in line with Equality Commission guidance.

4.29 The systems we have established to monitor the impact of policies and identify opportunities to better promote equality of opportunity and good relations are:

- The collection, collation and analysis of existing relevant primary quantitative and qualitative data across all nine equality categories on an on-going basis.
- The collection, collation and analysis of existing relevant secondary sources of quantitative and qualitative data across all nine equality categories on an on-going basis.
- An audit of existing information systems within one year of approval of this equality scheme, to identify the extent of current monitoring and take action to address any gaps in order to have the necessary information on which to base decisions
- Undertaking or commissioning new data if necessary.

4.30 If over a two year period monitoring and evaluation show that a policy results in greater adverse impact than predicted, or if opportunities arise which

would allow for greater equality of opportunity to be promoted, we will ensure that the policy is revised to achieve better outcomes for relevant equality groups.

4.31 We review our EQIA monitoring information on an annual basis. Other additional arrangements that we have in place to ensure our monitoring is mainstreamed throughout the Group include:

- Our Annual Progress Report to the Equality Commission includes an update on all of our monitoring activities.
- Our passenger survey which takes place twice a year gathers information through face to face interviews with passengers at various locations. Gender and age are recorded on a regular basis and questions about marital status, disability and numbers of dependants have been asked on particular occasions in connection with particular questions.
- Our equal opportunities process provides information on employees against a number of Section 75 categories. Translink has monitored all applicants for posts in terms of community background, age, gender and disability for a number of years. Monitoring by racial group was introduced more recently. In 2007-08 Translink revised and extended the equal opportunities monitoring questionnaire completed by all job applicants, taking account of the Equality Commission's guidance on monitoring, to include further categories and obtain more information on some of the categories currently included. In 2008-09 an exercise was carried out to obtain the same information from existing staff (on a voluntary basis). The IT system used to analyse the information obtained from monitoring has also been revised to allow for more detailed analysis.
- Annual qualitative monitoring with on-going communication with our Section 75 Reference Group, Passenger information Groups and regular meetings with IMTAC.

Our arrangements for publishing the results of our monitoring

(Schedule 9 4. (2) (d))

4.32 Schedule 9 4. (2) (d) requires us to publish the results of the monitoring of adverse impacts of policies we have adopted. However, we are committed to monitoring more broadly and the results of our policy monitoring are published as follows:

- EQIA monitoring information is published as part of our Section 75 annual progress report [see 2.7]
- This revised scheme and any results of monitoring will be sent directly to consultees by e-mail and other formats, on request.

- All information published is accessible and can be made available in alternative formats on request. Please see below at 6.3 for details.

During 2012 we will be undertaking an exercise to update our HR database. This process will ensure that the information we hold for all employees is correct, it will also enable us to gather additional data for the 9 Section 75 categories.

Chapter 5 Staff training

(Schedule 9 4.(2) (e))

Commitment to staff training

5.1 We recognise that awareness raising and training play a crucial role in the effective implementation of our Section 75 duties.

5.2 Our Group Chief Executive wishes to positively communicate the commitment of the Group to the Section 75 statutory duties, both internally and externally.

To this end we have introduced an effective communication and training programme for all staff and will ensure that our commitment to the Section 75 statutory duties is made clear in all relevant publications.

Training objectives

5.3 The Group will draw up/has drawn up a detailed training plan for its staff which will aim to achieve the following objectives:

- to raise awareness of the provisions of Section 75 of the Northern Ireland Act 1998, our equality scheme commitments and the particular issues likely to affect people across the range of Section 75 categories, to ensure that our staff fully understand their role in implementing the scheme
- to provide those staff involved in the assessment of policies (screening and EQIA) with the necessary skills and knowledge to do this work effectively
- to provide those staff who deal with complaints in relation to compliance with our equality scheme with the necessary skills and knowledge to investigate and monitor complaints effectively
- to provide those staff involved in consultation processes with the necessary skills and knowledge to do this work effectively
- to provide those staff involved in the implementation and monitoring of the effective implementation of the Group equality scheme with the necessary skills and knowledge to do this work effectively.

Awareness raising and training arrangements

5.4 The following arrangements are in place to ensure all our staff and Board Members are aware of and understand our equality obligations.

- We will develop a summary of this equality scheme and make it available to all staff.
- We will provide access to copies of the full equality scheme for all staff; ensure that any queries or questions of clarification from staff are addressed effectively.
- Appropriate Staff in the Group will receive a briefing on this equality scheme within one month after the approval of the scheme.
- The Section 75 statutory duties form part of induction training for new staff.
- Focused training is provided for key staff within the Group who are directly engaged in taking forward the implementation of our equality scheme commitments (for example those involved in research and data collection, policy development, service design, conducting equality impact assessments, consultation, monitoring and evaluation).
- Where appropriate, training will be provided to ensure staff are aware of the issues experienced by the range of Section 75 groups.
- When appropriate and on an on-going basis, arrangements will be made to ensure staff are kept up to date with Section 75 developments.

The Group has a clear procedure in place for the identification of training needs, the provision of appropriate training and evaluation of the benefits of all training undertaken. It appears that training associated with Section 75 is being effective in ensuring a high level of awareness of equality issues.

A short module on Section 75 has been incorporated into induction training:

- 65 Staff given awareness and screening training in 2005
- 404 staff attended the course during 2006/07
- 341 staff attended the course during 2007/08
- 99 staff attended the course during 2008/09
- 37 staff attended the course during 2009/10
- 80 staff attended the course during 2010/11
- 40 Staff attended the course during 2011/12

During 2006/07, 15 members of the working groups established to conduct EQIA's were trained to ensure that they had the necessary skills and knowledge to do this work effectively.

A training session was also provided for Members of the NITHCo Board.

5.5 Training and awareness raising programmes will, where relevant, be developed in association with the appropriate Section 75 groups and our staff.

In order to share resources and expertise, the Group will, where possible, work closely with other bodies and agencies in the development and delivery of training.

Monitoring and evaluation

5.6 Our training programme is subject to the following monitoring and evaluation arrangements:

- We evaluate the extent to which all participants in this training programme have acquired the necessary skills and knowledge to achieve each of the above objectives.
- The extent to which training objectives have been met will be reported on as part of the Section 75 annual progress report, which will be sent to the Equality Commission.

In addition to this over the past five years the Group has delivered:

- Eight Effective Selection and Recruitment workshops (3 in 2006/2007, 3 in 2007/2008 and 2 in 2008/2009).
- Three Company/ Employee Relations workshops (1 in 2006/2007, 1 in 2007/2008 and 1 in 2008/2009).
- Five Workshops on Ethnic/ Migrant awareness attended by 70 members of the Management Group in 2007/2008
- One Workshop on Ethnic / Migrant awareness attended by the Translink Executive Group in 2006/2007.
- Six Courses on Power Train Customer Services (3 in 2006/2007 and 3 in 2007/2008).
- Driving School Training Courses for trainees which included equality matters with 495 trainee's completing the course between 2006/7 and 2007/08.

- In 2007/08 a Driver Training day was devoted to 'Dealing with Customers' and included the Section 75 requirements as appropriate at that level, 1709 drivers attended.
- In 2008/09 a Driver Training Day that included diversity and cultural awareness training was attended by 2000 drivers.
- In 2006/07 an agreement was reached with the Institute of Leadership and Management (ILM) to appoint Translink as an ILM Centre for the delivery of the ILM Certificate in First Line Management. This course has been delivered to Depot Engineers in 2006/07, Engineering Supervisors in 2007/08 and a course was delivered in house in 2008/09.
- As part of the induction training a short module on Section 75 is incorporated with 37 staff attending this induction course during 2009/2010.
- A new programme on disability awareness for Front line staff has been introduced in 2009/2010 to enable them to better support customers with particular needs. 952 staff attended these sessions throughout the year.
- A new innovative culture change programme was also introduced during 2009/2010 to enhance the customer focused nature of the services we offer, with 720 drivers and inspectors attending during the year.
- Equality awareness training - A training programme for front line staff entitled Dealing with the Elderly was delivered in 2011/12 as part of the Certificate of Professional Competence programme. This session enabled participants to better support customers with particular needs. To date 1404 participants have attended.

Chapter 6: Our arrangements for ensuring and assessing public access to information and services we provide

(Schedule 9 4. (2) (f))

6.1 The Group are committed to ensuring that the information we disseminate and the services we provide are fully accessible to all parts of the community in Northern Ireland. We keep our arrangements under review to ensure that this remains the case.

6.2 We are aware that some groups will not have the same access to information as others, In particular:

- People with sensory, learning, communication and mobility disabilities may require printed information in other formats.

- Members of ethnic minority groups, whose first language is not English, may have difficulties with information provided only in English.
- Children and young people may not be able to fully access or understand information.

Access to information

6.3 To ensure equality of opportunity in accessing information, we provide information in alternative formats on request, where reasonably practicable. Where the exact request cannot be met we will ensure a reasonable alternative is provided.

- Alternative formats may include Easy Read, Braille, audio formats (CD, mp3 or DAISY), large print or minority languages to meet the needs of those for whom English is not their first language.
- The Group liaises with representatives of young people and disability and minority ethnic organisations and takes account of existing and developing good practice.
- We will respond to requests for information in alternative formats in a timely manner, within 20 working days.
- The Group is committed to ensuring that all of our services, facilities and passenger information are accessible to all passengers and are continually updating our Access Guide and our Access Policy to ensure that information is available to children and young people and people with learning disabilities. This information is readily available on the accessibility section of our website.
- We have specific arrangements in place to provide information about bus and train services in alternative language on request: all publications carry a note indicating the availability of alternative formats.
- The Group provides a guide to public transport in simple English which is specifically targeted to migrant workers from eastern European countries and the website also provides a link to Google translate.

6.4 In disseminating information through the media we will seek to advertise in the press where appropriate.

6.5 The Group has many other mechanisms in place to ensure that the information we provide is accessible to all which is included in our Access guide.

Access to services

6.6 The Group are committed to ensuring that all of our services are fully accessible to everyone in the community across the Section 75 categories.

The Group also adheres to the relevant provisions of current anti-discrimination legislation.

6.7 The specific arrangements that we have in place include:

- Dedicated assistance for disabled passengers on our bus and train services (24 hour notice)
- Audio and visual information systems
- Clear and accessible signage
- Dedicated feedback system for comments and suggestions

Assessing public access to information and services

6.8 We will annually monitor all our functions, in relation to access to information and services, to ensure equality of opportunity and good relations are promoted. Timescales are linked to the Corporate and business plans and any changes to plans will be reported to the ECNI and included in relevant publications and our annual progress report. Appendix 4 details more specific timelines for monitoring and screening activities to be undertaken by NITHC.

6.9 The accessibility of the services we provide is reviewed regularly and an independent review is carried out on the commitments of our passenger charter. Accessibility issues are discussed at our Annual Section 75 Reference Group meeting and also within the 10 passenger groups. The issue is also reviewed and discussed at our on-going meetings with IMTAC.

Chapter 7: Timetable for measures we propose in this equality scheme

(Schedule 9 4. (3) (b))

7.1 Appendix 4 outlines our timetable for all measures proposed within this equality scheme. The measures outlined in this timetable will be incorporated into our business planning processes.

7.2 This timetable is different from and in addition to our commitment to developing action plans/action measures to specifically address inequalities and further promote equality of opportunity and good relations. We have included in our equality scheme a commitment to develop an action plan. Accordingly, this commitment it is listed in the timetable of measures at Appendix 4. For information on these action measures please see above at 2.11 – 2.18.

Chapter 8: Our complaints procedure

(Schedule 9 10.)

8.1 The Group is responsive to the views of members of the public. We will endeavour to resolve all complaints made to us.

8.2 Schedule 9 paragraph 10 of the Act refers to complaints. A person can make a complaint to a public authority if the complainant believes he or she may have been directly affected by an alleged failure of the authority to comply with its approved equality scheme.

If the complaint has not been resolved within a reasonable timescale, the complaint can be brought to the Equality Commission.

8.3 A person wishing to make a complaint that the Northern Ireland Transport Holding Company has failed to comply with its approved equality scheme should use the contact details referenced on Page 8 of this scheme.

8.4 We will in the first instance acknowledge receipt of each complaint within 3 working days.

8.5 NITHC will carry out an internal investigation of the complaint and will respond substantively to the complainant within one (1) month of the date of receiving the letter of complaint. Under certain circumstances, if the complexity of the matter requires a longer period, the period for response to the complainant may be extended to two (2) months. In those circumstances, the complainant will be advised of the extended period within one month of making the complaint.

8.6 During this process the complainant will be kept fully informed of the progress of the investigation into the complaint and of any outcomes.

8.7 In any subsequent investigation by the Equality Commission, we will co-operate fully, providing access in a timely manner to any relevant documentation that the Equality Commission may require.

Similarly, we will co-operate fully with any investigation by the Equality Commission under sub-paragraph 11 (1) (b) of Schedule 9 to the Northern Ireland Act 1998.

8.8 We will make all efforts to implement promptly and in full any recommendations arising out of any Commission investigation.

Chapter 9: Publication of our equality scheme

(Schedule 9 4. (3) (c))

9.1 The Northern Ireland Transport Holding Company's equality scheme is available free of charge in print form and alternative formats by using the contact details referenced on Page 8 of this scheme.

9.2 Our equality scheme is also available on our website at:

www.translink.co.uk

9.3 The following arrangements are in place for the publication in a timely manner of our equality scheme to ensure equality of access:

- We will make every effort to communicate widely the existence and content of our equality scheme. This may include press releases, prominent advertisements in the press, and the internet and direct mail shots to groups representing the various categories in Section 75.
- We will email a link to our approved equality scheme to our consultees on our consultation lists. Other consultees without e-mail will be notified by letter that the scheme is available on request. We will respond to requests for the equality scheme in alternative formats in a timely manner.
- Our equality scheme is available on request in alternative formats such as Easy Read, Braille, large print, audio formats (CD, mp3, DAISY) and in minority languages to meet the needs of those not fluent in English.
- A summary of our scheme will be prepared and circulated to all the Section 75 groups in our consultee list that represent people with disabilities and children and young people. Copies of the summary scheme will also be circulated for discussion at our regular liaison meetings with IMTAC and also our Translink Youth Forum.

9.4 For a list of our stakeholders and consultees please see Appendix 3 of the equality scheme, visit our website at www.translink.co.uk or by using the contact details referenced on Page 8 of this scheme.

Chapter 10: Review of our equality scheme

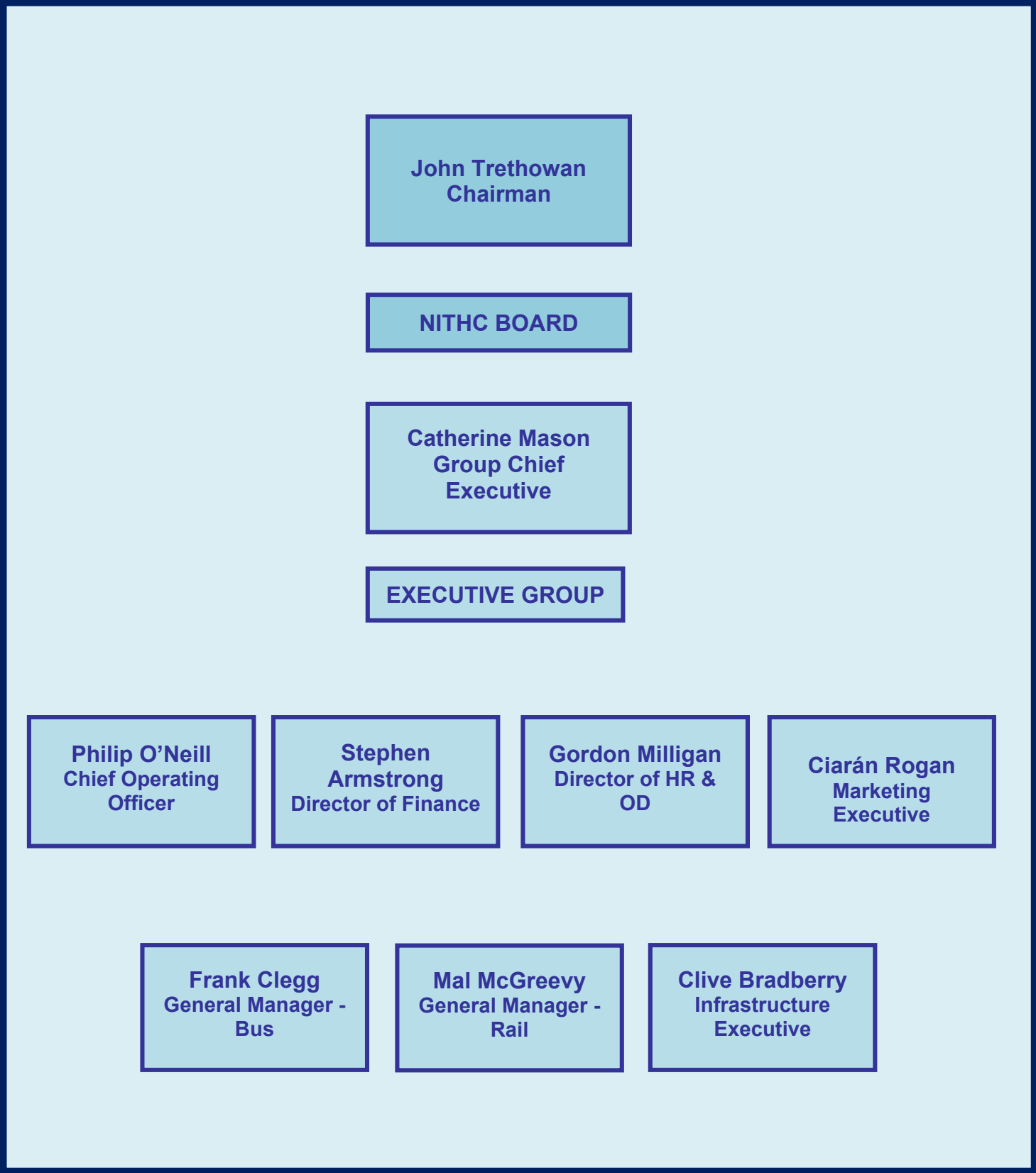
(Schedule 9 8. (3))

10.1 As required by Schedule 9 paragraph 8 (3) of the Northern Ireland Act 1998 we will conduct a thorough review of this equality scheme. This review will take place either within five years of submission of this equality scheme to the Equality Commission or within a shorter timescale to allow alignment with the review of other planning cycles.

The review will evaluate the effectiveness of our scheme in relation to the implementation of the Section 75 statutory duties relevant to our functions in Northern Ireland.

10.2 In undertaking this review we will follow any guidance issued by the Equality Commission. A report of this review will be made public by publication on the Translink website with consultees notified of the link by e-mail and sent to the Equality Commission.

Appendix 1: Group Organisational chart



Appendix 2: Example groups relevant to the Section 75 categories for Northern Ireland purposes

Please note, this list is for illustration purposes only, it is not exhaustive.

Category	Example groups
Religious belief	Buddhist; Catholic; Hindu; Jewish; Muslims, people of no religious belief; Protestants; Sikh; other faiths. For the purposes of Section 75, the term “religious belief” is the same definition as that used in the <i>Fair Employment & Treatment (NI) Order</i> ¹⁰ . Therefore, “religious belief” also includes any <i>perceived</i> religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “ <i>similar philosophical belief</i> ”.
Political opinion ¹¹	Nationalist generally; Unionists generally; members/supporters of other political parties.
Racial group	Black people; Chinese; Indians; Pakistanis; people of mixed ethnic background; Polish; Roma; Travellers; White people.
Men and women generally	Men (including boys); Trans-gendered people; Transsexual people; women (including girls).
Marital status	Civil partners or people in civil partnerships; divorced people; married people; separated people; single people; widowed people.
Age	Children and young people; older people.
Persons with a disability	Persons with disabilities as defined by the Disability Discrimination Act 1995.
Persons with dependants	Persons with personal responsibility for the care of a child; for the care of a person with a disability; or the care of a dependant older person.
Sexual orientation	Bisexual people; heterosexual people; gay or lesbian people.

¹⁰ See Section 98 of the Northern Ireland Act 1998, which states: “*In this Act... “political opinion” and “religious belief” shall be construed in accordance with Article 2(3) and (4) of the Fair Employment & Treatment (NI) Order 1998.*”

¹¹ *ibid*

Appendix 3: List of consultees

(Schedule 9 4. (2) (a))

ACOVO
Age Concern Northern Ireland (AGE NI)
Age Sector Reference Group
Alliance Party of NI
Amicus
Antrim Borough Council
Ards Borough Council
Armagh City & District Council
Ballymena Borough Council
Ballymoney Borough Council
Banbridge District Council
Barnardo's
Belfast City Council
Belfast Education & Library Board
Belfast Harbour Commissioners
British Deaf Association (NI)
Cara-Friend
Carers Northern Ireland
Carrickfergus Borough Council
Castlereagh Borough Council
CBI Northern Ireland
Central Policy Group
Children in Northern Ireland
Children's Law Centre
Chinese Welfare Association
Church of Ireland

Coleraine Borough Council
Committee on the Administration of Justice
Community Relations Council
Company
Cookstown District Council
Council for Catholic Maintained Schools
Craigavon Borough Council
Democratic Unionist Party
Department for Regional Development
Department for Social Development
Department of Employment and Learning
Department of Finance and Personnel
Department of Health, Social Services and Public Safety
Department of the Environment

Derry District Council
Director of Equality, Human Rights and TSN
Disability Action
Down District Council
Down's Syndrome Association
Dungannon & South Tyrone Borough Council
Employers' Forum on Disability
Equality Coalition
Equality Rights and Social Inclusion
Equality Unit
Family Planning Association NI
Federation of Small Businesses
Fermanagh District Council
Foras na Gaeilge
Gay and lesbian Youth NI
General Consumer Council for NI
Gingerbread Northern Ireland
Help the Aged, NI (Age NI)
Human Rights and Equality Unit
Indian Community Centre
IMTAC
Labour Party (Federation of Labour Groups)
Laganside Corporation
Larne Borough Council
Lesbian Line
Limavady Borough Council
Lisburn City Council
Londonderry Port & Harbour Commissioners
Magherafelt District Council
MENCAP
good Methodist Church in Ireland
Moyle District Council
Multi-Cultural Resource Centre
Newry & Mourne District Council
Newtownabbey Borough Council
NIC-ICTU
NIPSA
North Down Borough Council
North Eastern Education & Library Board
North West Community Network
North West Forum of People with Disabilities
Northern Ireland African Cultural Centre
Northern Ireland Anti-Poverty Network
Northern Ireland Association for Mental Health
Northern Ireland Council for Ethnic Minorities

Northern Ireland Council for Integrated Education
Northern Ireland Council for Voluntary Action
Northern Ireland Gay Rights Association
Northern Ireland Human Rights Commission
Northern Ireland Women's Aid Federation
Northern Ireland Women's Coalition
Northern Ireland Youth Forum
NSPCC
NUS-USI
Omagh District Council
Parents and Professional Autism
Presbyterian Church of Ireland
Press for Change
Progressive Unionist Party
Queer Space
Royal National Institute for the Blind (NI)
Royal National Institute for the Deaf People
Rural Community Network
Save the Children
SDLP
Sense NI
Simon Community
Sinn Fein
South Eastern Education & Library Board
Southern Education & Library Board
Staff Commission for Education & Library Board
Statutory Duty Unit
Strabane District Council
The Bishops Office
The Cedar Foundation
The Green Party
The Guide Dogs for the Blind Association
The Institute of Directors
The Local Government Staff Commission for NI
The Omnibus Partnership
The Rainbow Project
The Statutory Duty Unit
The Women's Centre
The Workers Party
Transport Advisor
Traveller and Gay
UK Unionist Party
Ulster Unionist Party
Unison
Warrenpoint Harbour Authority

Western Education & Library Board
Women's Forum Northern Ireland
Women's Information Group
Women's Resource & Development Agency
Women's Support Network
Youth Council for Northern Ireland
Youthnet

This consultation list is indicative and not exhaustive. The consultee list is reviewed on an annual basis to ensure that new and defunct organisations are added/ deleted as necessary. This task also ensures that contact names, addresses and e-mails are correct and allows for NITHC to ensure the list is relevant and runs parallel with our functions, duties and powers.

Appendix 4: Timetable for measures proposed

(Schedule 9 4.(3) (b))

Scheme Paragraph	Measure	Lead Responsibility	Timetable
2.5	Objectives and targets relating to the statutory duties will be integrated into our Corporate Plan, Corporate Objectives and Values.	All Directors, Equality Officer	Annually
2.7	Section 75 Annual Progress Report	Equality Officer	31 st August Annually
2.12	Audit of Inequalities	Equality Officer	November 2012
2.15	Consultation with our stakeholders and Consultee List	Equality Officer	July 2012
2.16	Monitoring and updating the progress of our action plan to ensure it remains effective and relevant	Equality Officer	Annually
2.18	Finalised Published action plan	Equality Officer	July 2012
3.2.5	Development of a programme of awareness raising on our Section 75 duties and commitments.	Equality Officer	Within one month of approval by the Equality Commission
4.15	Quarterly publication of Screening Reports	Equality Officer	Quarterly starting January 2013
4.2.9	Review of our information systems for monitoring purposes	Equality Officer	Within one year of Equality Commission approval of the scheme
4.3.1	Annual Review of our monitoring information	Equality Officer	Annually November 2013
4.3.3	Publication of Monitoring results	Equality Officer	Annually (31 st August)
5.3	Development of a detailed training programme	Equality Officer	Within 3 months of scheme approval
5.4	Development of Summary Equality Scheme for all staff and Board Members	Equality Officer	Within one month of scheme approval
5.4	Focused training for key personnel tasked with taking forward the scheme	Equality Officer	Within one month of scheme

			approval
5.6	Evaluation and monitoring of training	Equality Officer	Annually
6.3	Review and monitoring of our access to information	Equality Officer	Annually
6.3	Review and update of our website and access guide	Equality Officer	Annually
6.9	Accessibility of services	Equality Officer	Annually
9.3	Circulation of a summary of the scheme to various section 75 groups including groups representing children and young people, people with disabilities and ethnic minorities.	Equality Officer	Within 3 months of scheme approval
10.1	Review of Equality Scheme	Equality Officer	Within 5 years

Appendix 5: Glossary of terms

Action plan

A plan which sets out actions a public authority will take to implement its Section 75 statutory duties. It is a mechanism for the realisation of measures to achieve equality outcomes for the Section 75 equality and good relations categories.

Action measures and outcomes

Specific measures to promote equality and good relations for the relevant Section 75 and good relations categories, linked to achievable outcomes, which should be realistic and timely.

Adverse impact

Where a Section 75 category has been affected differently by a policy and the effect is less favourable, it is known as adverse impact. If a policy has an adverse impact on a Section 75 category, a public authority must consider whether or not the adverse impact is unlawfully discriminatory. In either case a public authority must take measures to redress the adverse impact, by considering mitigating measures and/or alternative ways of delivering the policy.

Affirmative action

In general terms, affirmative action can be defined as being anything consistent with the legislation which is necessary to bring about positive change. It is a phrase used in the Fair Employment and Treatment Order (NI) 1998 to describe lawful action that is aimed at promoting equality of opportunity and fair participation in employment between members of the Protestant and Roman Catholic communities in Northern Ireland.

Article 55 Review

Under the Fair Employment and Treatment (NI) Order 1998, all registered employers must conduct periodic reviews of the composition of their workforces and of their employment practices for the purposes of determining whether members of the Protestant and Roman Catholic communities are enjoying, and are likely to continue to enjoy, fair participation in employment in each employer's concern.

These reviews, which are commonly known as Article 55 Reviews, must be conducted at least once every three years.

Audit of inequalities

An audit of inequalities is a systematic review and analysis of inequalities which exist for service users and those affected by a public authority's policies. An audit can be used by a public authority to inform its work in relation to the Section 75 equality and good relations duties. It can also enable public authorities to assess progress on the implementation of the Section 75 statutory duties, as it provides baseline information on existing inequalities relevant to a public authority's functions.

Consultation

In the context of Section 75, consultation is the process of asking those affected by a policy (i.e., service users, staff, and the general public) for their views on how the policy could be implemented more effectively to promote equality of opportunity across the 9 categories. Different circumstances will call for different types of consultation. Consultations could, for example, include meetings, focus groups, surveys and questionnaires.

Differential impact

Differential impact occurs where a Section 75 group has been affected differently by a policy. This effect could either be positive, neutral or negative. A public authority must make a judgement as to whether a policy has a differential impact and then it must determine whether the impact is adverse, based on a systematic appraisal of the accumulated information.

Discrimination

The anti-discrimination laws prohibit the following forms of discrimination:

- Direct discrimination
- Indirect Discrimination
- Disability Discrimination
- Victimisation
- Harassment

Brief descriptions of these above terms follow:

Direct discrimination

This generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, on one or more of the statutory non-discrimination grounds. A decision or action that is directly discriminatory will normally be unlawful unless: (a) in an age discrimination case, the decision can be objectively justified, or (b) in any other case, the public authority can rely on a statutory exception that permits it – such as a *genuine occupational requirement exception*; or, a *positive action exception* which permits an employer to use “welcoming statements” or to take other lawful positive action to encourage participation by under-represented or otherwise disadvantaged groups.

Indirect discrimination

The definition of this term varies across some of the anti-discrimination laws, but indirect discrimination generally occurs where a public authority applies to all persons a particular provision, criterion or practice, but which is one that has the effect of placing people who share a particular equality characteristic (e.g. the same sex, or religious belief, or race) at a particular disadvantage compared to other people. A provision, criterion or practice that is indirectly discriminatory will normally be unlawful unless (a) it can be objectively justified, or (b) the public authority can rely on a statutory exception that permits it.

Disability discrimination

In addition to direct discrimination and victimisation and harassment, discrimination against disabled people may also occur in two other ways: namely, (a) *disability-related discrimination*, and (b) *failure to comply with a duty to make reasonable adjustments*.

- (a) *Disability-related discrimination* generally occurs where a public authority, without lawful justification, and for a reason which relates to a disabled person’s disability, treats that person less favourably than it treats (or, would treat) other people to whom that reason does not (or, would not) apply.
- (b) *Failure to comply with a duty to make reasonable adjustments*: One of the most notable features of the disability discrimination legislation is that in prescribed circumstances it imposes a duty on employers, service providers and public authorities to take such steps as are reasonable to remove or reduce particular disadvantages experienced by disabled people in those circumstances.

Victimisation

This form of discrimination generally occurs where a public authority treats a person less favourably than it treats (or, would treat) another person, in the same or similar circumstances, because the person has previously exercised his/her rights under the anti-discrimination laws, or has assisted another person to do so. Victimisation cannot be justified and is always unlawful.

Harassment

Harassment generally occurs where a person is subjected to unwanted conduct that is related to a non-discrimination ground with the purpose, or which has the effect, of violating their dignity or of creating for them an intimidating, hostile, degrading, humiliating or offensive environment. Harassment cannot be justified and is always unlawful.

Economic appraisal

An economic appraisal is a systematic process for examining alternative uses of resources, focusing on assessment of needs, objectives, options, costs benefits, risks, funding and affordability and other factors relevant to decisions.

Equality impact assessment

The mechanism underpinning Section 75, where existing and proposed policies are assessed in order to determine whether they have an adverse impact on equality of opportunity for the relevant Section 75 categories. Equality impact assessments require the analysis of both quantitative and qualitative data.

Equality of opportunity

The prevention, elimination or regulation of discrimination between people on grounds of characteristics including sex, marital status, age, disability, religious belief, political opinion, dependants, race and sexual orientation.

The promotion of equality of opportunity entails more than the elimination of discrimination. It requires proactive measures to be taken to secure equality of opportunity between the categories identified under Section 75.

Equality scheme

A document which outlines a public authority's arrangements for complying with its Section 75 obligations. An equality scheme must include an outline of the public authority's arrangements for carrying out consultations, screening, and equality impact assessments, monitoring, training and arrangements for ensuring access to information and services.

Good relations

Although not defined in the legislation, the Commission has agreed the following working definition of good relations: 'the growth of relations and structures for Northern Ireland that acknowledge the religious, political and racial context of this society, and that seek to promote respect, equity and trust, and embrace diversity in all its forms'.

Mainstreaming equality

The integration of equal opportunities principles, strategies and practices into the everyday work of public authorities from the outset. In other words, mainstreaming is the process of ensuring that equality considerations are built into the policy development process from the beginning, rather than being bolted on at the end. Mainstreaming can help improve methods of working by increasing a public authority's accountability, responsiveness to need and relations with the public. It can bring added value at many levels.

Mitigation of adverse impact

Where an equality impact assessment reveals that a particular policy has an adverse impact on equality of opportunity, a public authority must consider ways of delivering the policy outcomes which have a less adverse effect on the relevant Section 75 categories; this is known as mitigating adverse impact.

Monitoring

Monitoring consists of continuously scrutinising and evaluating a policy to assess its impact on the Section 75 categories. Monitoring must be sensitive to the issues associated with human rights and privacy. Public authorities should seek advice from consultees and Section 75 representative groups when setting up monitoring systems.

Monitoring consists of the collection of relevant information and evaluation of policies. It is not solely about the collection of data, it can also take the form of regular meetings and reporting of research undertaken. Monitoring is not an end in itself but provides the data for the next cycle of policy screening.

Northern Ireland Act

The Northern Ireland Act, implementing the Good Friday Agreement, received Royal Assent on 19 November 1998. Section 75 of the Act created the statutory equality duties.

Northern Ireland Human Rights Commission

A statutory body established under Section 68 of the Northern Ireland Act 1998, which works to ensure that the human rights of everyone in Northern Ireland are fully protected in law, policy and practice.

Policy

The formal and informal decisions a public authority makes in relation to carrying out its duties. Defined in the New Oxford English Dictionary as ‘a course or principle of action adopted or proposed by a government party, business or individual’. In the context of Section 75, the term **policy covers** all the ways in which a public authority carries out or proposes to carry out its functions relating to Northern Ireland. Policies include unwritten as well as written policies.

Positive action

This phrase is not defined in any statute, but the Equality Commission understands it to mean any lawful action that a public authority might take for the purpose of promoting equality of opportunity for all persons in relation to employment or in accessing goods, facilities or services (such as health services, housing, education, justice, policing). It may involve adopting new policies, practices, or procedures; or changing or abandoning old ones. *Positive action* is not the same as *positive discrimination*.

Positive discrimination differs from positive action in that *positive action* involves the taking of lawful actions whereas *positive discrimination* involves the taking of unlawful actions. Consequently, *positive action* is by definition lawful whereas *positive discrimination* is unlawful.

Qualitative data

Qualitative data refers to the experiences of individuals from their perspective, most often with less emphasis on numbers or statistical analysis. Consultations are more likely to yield qualitative than quantitative data.

Quantitative data

Quantitative data refers to numbers, typically derived from either a population in general or samples of that population. This information is often analysed by either using descriptive statistics, which consider general profiles, distributions and trends in the data, or inferential statistics, which are used to determine ‘significance’ either in relationships or differences in the data.

Screening

The procedure for identifying which policies will be subject to equality impact assessment, and how these equality impact assessments will be prioritised. The purpose of screening is to identify the policies which are likely to have a minor/major impact on equality of opportunity so that greatest resources can be devoted to improving these policies. Screening requires a systematic review of existing and proposed policies.

Schedule 9

Schedule 9 of the Northern Ireland Act 1998 sets out detailed provisions for the enforcement of the Section 75 statutory duties, including an outline of what should be included in an equality scheme.

Section 75

Section 75 of the Northern Ireland Act provides that each public authority is required, in carrying out its functions relating to Northern Ireland, to have due regard to the need to promote equality of opportunity between:-

- persons of different religious belief, political opinion, racial group, age, marital status and sexual orientation;
- men and women generally;
- persons with a disability and persons without; and
- persons with dependants and persons without.

Without prejudice to these obligations, each public authority in carrying out its functions relating to Northern Ireland must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion or racial group.

Section 75 investigation

An investigation carried out by the Equality Commission, under Schedule 9 of the NI Act 1998, arising from the failure of a public authority to comply with the commitments set out in its approved equality scheme.

There are two types of Commission investigation, these are as follows:

1. An investigation of a complaint by an individual who claims to have been directly affected by the failure of a public authority to comply with its approved equality scheme;
2. An investigation initiated by the Commission, where it believes that a public authority may have failed to comply with its approved equality scheme.

Appendix 6 Action plan/action measures

AUDIT of INEQUALITIES

&

ACTION PLAN

NORTHERN IRELAND TRANSPORT

HOLDING COMPANY



***This Audit of Inequalities and Action Plan will not form part of our approved
Equality Scheme***

EXECUTIVE SUMMARY

The NITHCo Board, Executive Group, and Senior Management Team have made a commitment to fulfil all of our duties without prejudice to promote good relations between persons of different religious belief, political opinion or racial group.

NITHCo is committed to the fulfilment of its Section 75 obligations in all parts of its organisation including its subsidiary companies (Metro, NI Railways and Ulsterbus who operate under the brand name Translink).

We are committed to the allocation of the necessary resources in terms of time, money and people to ensure that our statutory duties are fulfilled and that our equality scheme is implemented effectively and on time.

NITHC consider that the commitments that we made in the first Equality Scheme published in September 2005 have ensured that solid foundations were put in place to produce the delivery of the commitments made and also allowed mainstreaming equality considerations to be a part of the standard policy development process.

Before the introduction of the Equality Scheme we had a wide range of procedures in place for ensuring that the promotion of equality of opportunity and good relations was accorded a high priority.

NITHC/ Translink have continued to train and develop staff in the areas of equality issues and section 75 issues and the on-going monitoring of the Equality Scheme will ensure that best practice developments are continually reviewed.

The need to promote equality of opportunity and good relations was therefore already effectively mainstreamed into the policy making process. However, the adoption of the Equality Scheme provided a good opportunity to remind all staff of the importance of these issues and to review procedures to ensure that best practice was being followed. The introduction of the Equality Scheme also led to the establishment of an Equality Working Group composed of senior managers which gave extra impetus to the implementation of the action plan contained within the scheme.

We have now developed a revised equality scheme including an updated action plan that has been implemented following an audit of inequalities. This process will ensure that we continue to refine and develop our services, programmes and policies to ensure that they are fully meeting the needs of all our customers.

In developing our action plan we acknowledge that there are information gaps on both ethnic minorities and sexual orientation and have included actions that we will be undertaking to fill these gaps.

We have adopted the process of revisiting the background work that was undertaken for our first equality scheme and this has allowed us to develop action measures to address any inequalities identified.

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SECTION 1

BACKGROUND TO AUDIT OF INEQUALITIES

In 2010 the Equality Commission published revised guidance for public authorities relating to the implementation of Section 75 of the Northern Ireland Act 1998. This Guidance was developed in the light of the conclusions and recommendations of the Commission's Final Report of the Review of the Effectiveness of Section 75, published in November 2008. One of the key recommendations of the Review related to the need to shift the focus of delivery of the section 75 duties from process to outcomes. The revised guidance recommended therefore that public authorities develop action plans to address inequalities experienced across the section 75 categories, alongside the development of their revised Equality Schemes.

The current Equality Scheme of the Northern Ireland Transport Holding Company was approved in September 2005 and a 5 year review of the scheme was undertaken and submitted to the ECNI in March 2011. We will submit a revised Equality Scheme to the Equality Commission by November 2012.

This Audit of Inequalities has enabled us to identify potential areas for further improvements in regard to our Section 75 duties and will inform our Equality Action Plan. The Equality Action Plan will be reviewed after one year and if required will be revised in line with our corporate planning cycle.

Many of our functions are statutory and cover all S75 categories; however, some areas of work may have a greater impact on specific S75 groups.

Action Plan Development

This Audit of Inequalities has been undertaken in conjunction with all Departments across the Translink Group led by the Equality Working Group, a working group comprising Directors and Executives from all areas of the business, this has allowed for comprehensive review and collection of data from all departments. Each individual Department have reviewed both Policy and Function within their area. The Equality working group developed a model inequalities template for all departments to use and tailored to their own needs. The Action Plan will be reviewed annually by the Equality Working Group to identify key areas of inequalities that may be required to be addressed.

SECTION 2

NITHC/ TRANSLINK RESPONSIBILITIES

The *Equality Commission Guide on Section 75* advised that public authorities took a systematic look at its functions and how they relate to the promotion of equality of opportunity and of good relations. The objective is to identify potential functional areas for further or better discharge of statutory duties.

This audit of Section 75 inequalities has provided the basis for the development of our Equality Action Plan. This provides action measures with associated performance indicators and timescales to address the key inequalities identified.

Section 75 makes equality issues central to public policy making and, as such, is mainstreamed across all the Group's business areas. The Head of Corporate Services is the designated Equality Officer and is responsible for ensuring that Section 75 obligations are taken into account in developing and implementing the Group's Equality strategy.

Equality issues are addressed through mainstream operations rather than through a single equality unit to ensure that the equality scheme has been implemented efficiently and effectively. An Equality Working Group was established to oversee this process that includes Directors, Heads of Departments and other Senior Management.

From the outset of the NITHC Equality Scheme, Senior Management has played a pivotal role in ensuring that appropriate structures and procedures were established to support the mainstreaming of equality issues.

NITHC produce bi-annual progress reports to the Board that include monitoring against the objectives and targets relating to Section 75 duties which have been integrated into corporate strategies and operational plans.

SECTION 3

INEQUALITY IDENTIFICATION

All of our services and programmes have already been adjusted to address inequalities. We recognise however that more can be done. The information gathered from our various Departments and those working in areas regarding the identification of possible future areas of work have been collated to develop the attached Equality Action Plan. The inequalities identified by this process are included in our action plan at Section 10.

We have taken the approach of revisiting all the previous screening work undertaken in our current equality scheme and rescreening the 11 policies that were subject to Equality Impact Assessment, we also included screening on our

Flags and Emblems Policy with the key findings of the rescreening process as follows:

Signage

The policy aim is to ensure that signage at each of our locations is consistent and accessible to all passengers.

The Group's Marketing Department has issued guidance and templates to all locations clearly setting out correct font and size.

Consultation was undertaken with IMTAC to ensure that the guidance issued was correct and consistent and in line with our passenger charter.

Fares Policy (October 2005)

The aim of the policy is to ensure that we offer value for money price travel on an equitable basis within a commercial environment.

The approval of this policy is determined by the Group Board to meet the Corporate Plan and DRD funding Targets. The Regional Development Committee and the Consumer Council for Northern Ireland are consulted as part of this process. We also consulted with the Translink Youth Forum.

The working group re screening this policy obtained the relevant evidence from our annual Passenger Profile which is information contained within our Public Transport Monitor undertaken by an external agency (PwC).

Refunds (Ticket and Pass Refund Policy – July 2010)

The aim of the policy is to ensure consistency and proportionality in respect of any used or part unused of any ticket or pass.

This policy is defined by a fares working group that consists of senior managers and Executives.

The working group re screening this policy obtained the relevant evidence from policy set by the Department for Regional Development.

Recruitment (Procedures and Code of Practice – August 2011)

The policy aim is to outline effective procedures through which people are appointed. It also sets out the Group recruitment and selection policy, procedures and processes. The selection criteria are merit and ability only and define the ways that people (both externally and internally) are appointed to posts within the organisation.

The policy is defined by the Director of Human Resources and Organisational Development in consultation with Executive colleagues.

The Equality Commission, Employers for Disability and other similar organisations and bodies are often consulted on recruitment and selection matters with adaptations made to the policy as and when appropriate.

Sickness absence

(Attendance Management and rehabilitation policy – August 2011)

The aim of this policy is to provide guidance to employees, supervisors and managers about the management of sickness absence and associated procedures and administrative routines.

The Policy's objective is to set standards of attendance and fair and reasonable procedures for dealing with employees who experience frequent or extended periods of absence through sickness.

The policy is defined by the Director of Human Resources and Organisational Development in consultation with Executive colleagues. When the policy was first introduced in 2006 Trade Unions were fully consulted.

Job sharing (August 2011)

This policy is related to our Equal Opportunities Policy by enabling flexibility in how staff approaches their working pattern.

Job sharing policies are generally viewed as being beneficial for recruitment and retention of employees who otherwise without benefiting from the policy might leave our employment; this may remove a barrier that some staff, particularly women faces, if they wish to continue a career with family responsibilities.

The policy is defined by the Director of Human Resources and Organisational Development in consultation with Executive colleagues.

Bereavement and special leave (August 2011)

The Policy relates to leave given by the Company where unexpected events occur which cannot be planned for such as bereavement or serious domestic problems.

The policy is defined by the Director of Human Resources and Organisational Development in consultation with Executive colleagues.

Ill-health early retirement (Retirement/ Early retirement/ Ill Health)

The aim of the policy is to formalise the procedures for retirement due to age or medical grounds.

The policy is defined by the Director of Human Resources and Organisational Development in consultation with Executive colleagues and the company pension provider NILGOSC and has been fully consulted upon with the various trade unions that represent the Groups employees.

Redundancy

The policy aim is to set down a process for redundancy selection and the conditions of staff through the consultation process in the Group.

There have been a number of voluntary redundancies in the Group within the past 3 years. An analysis of the data from these does not reveal any differential impact issues across any of the categories.

Dress Code (Caring for your uniform policy – August 2011)

The policy aim is to provide staff with guidelines as to what dress standards are expected of them whilst carrying out their duties and washing instructions on how to look after the various items of uniform provided.

Employees with a requirement/ desire to wear an item of clothing because of religious beliefs or race from part of the policy in line with the group's "flags & emblems policy". Some accommodation in uniform for those employees with a disability is also considered as well as allowance for those undergoing gender reassignment.

The policy issues are of general interest to employees and trade unions and a wide variety of views are expressed at Uniform Committee meetings or in local consultation forums.

A roll out of new uniforms is due to take place in summer 2012. A workshop and presentation has been planned in advance of the roll out which may lead to modifications to the policy.

Procurement (and Procedures March 2012)

The policy aim ensures that the standards for the Group procurement of goods, services and works to ensure compliance with all relevant Group, Government Policy and legislative requirements.

There is currently no evidence that any of the different groups within the nine categories are directly affected by the Procurement Policy and Procedures therefore no full equality impact assessment is required at this time.

EQIA Screening on each requirement raised is outside the scope of the Procurement Policy and Procedures. However, it is recommended that screening questions should be applied and a screening decision should be made by budget holders as part of project initiation i.e. at the point where a need is identified and specification is developed.

Flags and Emblems (August 2011)

The policy aim sets out guidance for employees with the objective of promoting a good and harmonious working environment in line with our equal opportunities policy.

The policy was subject to wide consultation within the various trade union consultative groups and generated much discussion and comment. In general the trade unions give their support to the principles enshrined in this policy.

The Equality Commissions Guidance “promoting a good and harmonious working environment”, was a key point of reference.

SECTION 4

CONSIDERATION OF AVAILABLE DATA, RESEARCH AND INFORMATION

This section details the data, research and information we have used for this assessment.

- Section 75 Complaints received by the Group
- The ECNI Statement of Key Inequalities 2007
- Section 75 Annual Progress Report to the ECNI
- The 5 year review of our Equality Scheme
- EQIA and Screening exercises undertaken in the past 5 years
- The Group Equality Working Group
- The 2001 Census
- Report of the Promoting Social Inclusion Working Group on Disability
- Translink Access Policy
- Translink Access Guide (Included at Appendix 1)

IMTAC

The Accessible Transport Strategy, published by Government in 2005, confirmed the Inclusive Mobility and Transport Advisory Committee (IMTAC) as the main source of independent advice to Government and others in Northern Ireland on all transport issues that affect the mobility of older people and disabled people.

IMTAC'S work mirrors two similar committees in Great Britain. The Disabled Persons Transport Advisory Committee (DPTAC) advises Government in England and Wales. The Mobility and Access Committee for Scotland (MacS) has the same role in Scotland.

IMTAC works closely with policy makers and transport providers to ensure that accessibility for disabled people and older people is a major consideration in the development of transport policy and transport services.

IMTAC seeks to promote participation by disabled people and older people in its work and the development of policy and services through an outreach programme.

Translink has regular liaison meetings with IMTAC regarding the accessibility of services to disabled people.

In the past IMTAC have provided input into new initiatives that have importance to disabled people.

AREA USER GROUPS

We currently have 10 passenger groups: 6 for bus and 4 for rail. The groups are broken down by area for the bus groups and by line for the rail groups:

Bus Groups

Metro Group (Belfast)
North Eastern Group
North Down Group
South Western Group
South Eastern Group
North Western Group

Rail Groups

North West Group (Upper L'Derry line)
Ballymena Line
Larne Line
Bangor/Portadown Line

Each group contains a maximum of 12 members, made of regular passengers, ensuring the demographic is representative of all passengers. i.e.: good variation of age, gender, journey type, employment status etc. Each group is independently chaired by a volunteer with relevant managerial experience.

Groups meet three times per year and also provide feedback throughout the year by posting in comment forms on a regular basis to report any issues they see while travelling. During the meetings, passengers are invited to raise any relevant issues relating to our services and are also provided with a report on current activity by an Area Manager and Marketing representative. All issues raised are recorded and fed back to Senior Management and a written report is also compiled. Many positive changes/improvements to services are made regularly thanks to the feedback from our passengers; therefore these groups are highly valued.

S75 REFERENCE GROUP

NITHCo established the Section 75 Reference Group and held its first meeting in June 2008. The group involves a number of voluntary groups including, The NI Gay Rights Association, The Rural Community Network and the NI Youth Forum. The group meets at least once per year to discuss any issues that may have arisen. The group is also asked to comment and report on aspects of Translink policies that may cause concern for the groups that they represent.

TRANSLINK YOUTH FORUM

We have set up a Translink Youth Forum for young people aged between 11 and 23 so we can listen to their views about and experiences of our services. Young people are not only customers now but also in years to come, so it is important we listen to them. This group will support the work of our existing successful passenger groups for bus and rail networks. These groups meet quarterly to discuss the services we currently provide and are vital in helping us to shape service provision and improve customer service into the future.

STAFF MONITORING

The staff monitoring questionnaire that was end to staff produced useful results and was a worthwhile exercise to get information from members of staff from all backgrounds, grades and business areas.

PASSENGER SURVEY

Throughout 2011/12 the Group continued to collect some information on Section 75 characteristics of passengers through the passenger surveys conducted in Spring and Autumn every year. The information gathered from 2000 face to face interviews carried out on buses and trains and at bus and rail stations has recorded information on:

- Gender and age
- Marital status
- Disability
- Number of dependants, if any.

It was considered that it would be inappropriate to ask about sensitive issues such as religious belief, political opinion and sexual orientation in a brief face to face interview as the survey is not anonymous as names are taken by research supervisors to allow for checks.

SECTION 5

ASSESSMENT OF INEQUALITIES BY SECTION 75 CATEGORIES

We have gathered the following information from external reports and studies and a number of internal publications including our Annual Report and Accounts, Corporate Plan and information obtained from all business areas in the Group and present the finding of each section 75 category below.

Persons with a Disability

Translink has regular liaison meetings with IMTAC regarding the accessibility of services to Disabled & Older people. Translink officers are full members and attend all IMTAC meetings. The close working relationship with IMTAC means that a wide range of issues of importance to disabled people can be discussed in detail and IMTAC have frequent input into the way initiatives are developed. Membership of this group gives Translink officers access to many groups of disabled and older people who may be reluctant to approach a large organisation directly. We also explore with IMTAC how information provision on transportation issues can be improved for people with learning disabilities.

The 2007 NISALD survey found that 16% of people with a disability experienced difficulties using public transport particularly in respect of getting on and off buses. The current statistic for accessibility on our bus fleets are 81% for Ulsterbus and 100% for Metro.

Appendix 1 (Extract from The Translink Access Guide) details the services and provisions that are in place to ensure accessibility for persons with a disability.

Age

Translink has a number of initiatives in place to ensure that all age groups are catered for and no differential impact exists between the categories (these are included at section 2.10).

We also have a number of ticket types that cover a broad area and enable passengers of all ages to access them, these include;

- yLink (a young person's card to allow access to discounted fares for those under 24).
- mLink (a mobile phone ticketing service).

- Senior SmartPass (Free travel available to all Northern Ireland residents aged 65 and over).
- 60+ SmartPass (If you are aged between 60 and 64 and you are a permanent resident of Northern Ireland, then you are eligible for a 60 Plus SmartPass. This enables you to be eligible for free travel throughout Northern Ireland).
- iLink (is available for adults and children and is ideal if you travel by both bus and train to your destination on a regular basis).

Between 1999 and 2010 the average miles per person travelled on public transport has increased from 358 in 1999 to 367 in 2010. We would like to see these figures continue to rise for all age groups in the population and believe that the initiatives listed above will enable easier access to our services.

Overall children make 11% of their journeys by public transport compared to 4% by adults. The figure for children is mainly due to younger people not having access to the same modes of transport as adults and 1 in 20 children using public transportation to attend education.

Racial Group

There is very limited quantitative data on racial groups and its correlation with public transport. We continued to use our Travelling with Translink guide to provide information to people from various countries whose first language may not be English, the guide includes details on all of our network, fares and ticketing, policies, the concession schemes, airport links, contact numbers and everything a person needs to know to start using Translink bus and rail services.

We also have a Minority Language Policy in place that gives advice and guidance to all staff in dealing with telephone, written and face to face communication.

Men and women generally

Taking all journeys made using transportation; women (6%) are more likely to use public transport than men (5%).

It has been identified that women are underrepresented in bus drivers within the Group and we continued the implementation of our family friendly employment policies including stating explicitly that applications from women are welcomed.

Religious Belief

Due to the services that we provide being available throughout Northern Ireland we have found no major public transport issues or inequalities in respect of religious belief. This is reinforced by the DRD travel survey statistic that the proportion of travel by public transport for both Catholics and Protestants is the same at about 4%.

Political Opinion

Historical records indicate that voting preferences in Northern Ireland closely reflect religious belief and we have found no major public transport issues or inequalities in respect of Political opinion.

Sexual Orientation

Despite numerous consultations and invitations to join reference groups to provide input into reports we have very little information on sexual orientation and its likely impact on using public transportation.

We will continue to provide all of our consultative information to the Groups on our consultee list and continue to contact the various groups to try and secure membership to our Section 75 Reference Group.

Persons with/ out Dependants

Information taken from the DRD Travel Survey indicates that persons with dependants are less likely to be reliant on public transport than those without dependants.

Our 'Travelling with Translink – A guide to using public transport in Northern Ireland' states that buggies and prams are to be carried free of charge and indicate that both rail and bus services have dedicated pram spaces (where available). Accessibility may also be a factor for people with mobility needs and these have been factored into bus and rail station design with facilities on one floor, tactile flooring and accessible toilets. There are also dedicated wheelchair spaces on both bus and rail services.

A review and revision of eligibility and priority criteria for the job sharing policy also gives more flexibility to working parents.

Marital Status

Reports, publications and monitoring statistics show that there are no major issues or inequalities linked to marital status and use of public transportation.

Internally we have reviewed our employment policies including maternity and paternity leave policies to ensure that people who are not married benefit in the same way as married people

SECTION 6

CONCLUSIONS

This Audit of Inequalities has confirmed the significance of section 75 in how the Group services are designed and delivered.

Since our equality scheme was implemented in September 2005 we have undertaken significant work that has benefited all 9 section 75 categories; details of which can be found within our Annual Progress Reports to the Equality Commission and our five year review which can be found at www.translink.co.uk

We are committed to continue to monitor and develop our programmes and services to ensure that they are fully accessible to all sections of the community. We will seek to fill the information gaps that currently exist within our service delivery and address them through our section 75 commitments.

SECTION 7

CONSULTATION

A pre consultation of this new scheme and the action plan and audit of inequalities was carried out with the Equality Commission in June 2012 and with our Equality Working Group in May 2012.

This draft Audit of Inequalities will be consulted upon alongside our New Revised Equality Scheme and Action Plan. Copies will be sent to all consultees on our Section 75 consultation list and will run for 12 weeks and will be made available on the Translink website.

SECTION 8

PUBLICATION OF ACTION PLAN

Our final Action plan which will be submitted and approved by the Equality Commission and will be published at www.translink.co.uk with an electronic copy sent to all who responded during the consultation process.

The final action plan will be made available in an accessible format such as large print, Braille or audio format on request.

SECTION 9

MONITORING AND REVIEW

As detailed in our timeline for measures we will monitor annually the action plan and update both our website and the Equality Commission.

Responsibility for the monitoring and review of the action plan rest with the Company Equality Officer alongside the Equality Working Group.

SECTION 10
AUDIT OF INEQUALITIES ACTION PLAN

ACTION PLAN 2012 - 2015

Area of Implementation	Tasks	Action Measures	Performance indicator	Timescale	Associated Research/ Monitoring
Consultation on the draft revised scheme	Send draft scheme to consultees in Appendix 3	Draft scheme e-mailed or posted to consultees	n/a	July 2012	n/a
	Actively seek comments from a range of groups	Actively engage with the Section 75 Reference Group.	n/a	September 2012	Section 75 Reference Group
	Revise the Equality Scheme to take account of consultee comments	Collate responses and include in the revised scheme.	n/a	September 2012	Consultee comments
	Submission to the ECNI	Finalised scheme submitted to the ECNI	n/a	November 2012	n/a
Consultation	Consult Section 75 groups regarding the best means of communication	Address and e-mail database created	n/a	June 2012	n/a
	Make arrangements to provide documents in alternative formats	Braille, Audio, large print and minority language	n/a	July 2012	n/a
Publication of the revised scheme	Develop plain English version of the scheme	Development of plain English version	n/a	November 2012	n/a
	Publish Scheme on website	Final scheme put onto www.translink.co.uk	n/a	December 2012	n/a

	Send copies of the final scheme to consultees and stakeholders.	Final approved scheme sent to all consultees and stakeholders	n/a	December 2012	n/a
Annual Review of Scheme	Annual Review of scheme conducted by the Equality Working Group.	EWG meeting in November of each year to focus on review of the new scheme	n/a	November annually	n/a
	Include summary of the review in the Annual Progress Report	EWG Review of scheme included in the annual progress report to the ECNI	n/a	August annually	n/a
Screening	Continue to screen all policies.	On-going review of all Group policies with the appropriate results of any screening process to be consulted upon.	n/a	At the conclusion of the screening process	n/a
Equality Impact Assessments	Carry out EQIA as necessary based on screening reports	Based on the outcome of the screening process on policy.	n/a	At the conclusion of each assessment	n/a
Monitoring adverse impact	Continual audit of existing information	Continued collection and collation of existing data and the commissioning of new data as necessary to ensure no adverse impact.	n/a	EWG Annually	Existing Group data, monitoring results and any new data commissioned.
Public access to information	Communication and publication of Section 75 Reports and information	Continued use of the Translink website as a hub for all Group information relating to section 75.	n/a	EWG Annually	n/a
Training	Ensure that relevant staff are updated on the contents to the new scheme.	On-going awareness training for relevant staff and the EWG members.	n/a	EWG Annually	n/a
	Disability Equality Training	Review of Training providers and training		EWG Annually	

		delivered.			and other consultees.
Review of the Scheme	A comprehensive review of the scheme within 5 years or sooner if appropriate	A comprehensive 5 year review of the scheme to be carried out and sent to the ECNI.	n/a	November 2016	n/a
Section 75 Category	Inequality identified	Action Measures	Performance indicator	Timescale	Associated Research/ Monitoring
Religious Belief	Under representation of people from various religious backgrounds compared to the NI labour market.	Use of positive action advertising statements to encourage applications from underrepresented groups.	Group Fair Employment Returns	Annually	NI Labour Market Bulletins and statistics agency.
Political Opinion	Gaps in qualitative and quantitative data collection.	Use of the PwC monitoring statistics	Monitoring Statistics	Annually	PwC/ Marketing
Racial Group	Access to Information Under representation of people from ethnic minority backgrounds compared to the NI labour market.	Continued use of providing information in alternative formats including use of the Group Minority Language Policy. Use of positive action advertising statements to encourage applications from underrepresented groups.	n/a Group Fair Employment Returns	Annually Annually	Minority Language Policy NI Labour Market Bulletins and statistics agency.
Age	Accessibility of public transport services for young people. Accessibility of public	The introduction of an integrated ylink card for young people aged 16 – 23 to obtain discounted bus and rail travel on Translink Services. The continued implementation of DRD policy for residents aged 60 or over to be provided with free		Summer 2012 n/a	The Translink Youth Forum. DRD

	<p>transport services for older people.</p> <p>Passengers over 60 travelling on concession passes are not able to take advantage of discount vouchers and are therefore not entitled to any form of redress when they suffer a delay.</p> <p>Recent data analysis indicates improved employment monitoring figures in relation to gender and disabled people. The analysis indicates improved figures for 50+ and lower numbers for those under 20.</p> <p>Safety of public transport services for young people.</p>	<p>travel.</p> <p>There is an opportunity to harmonise passenger redress across the network on a mileage/ time delay basis.</p> <p>Our policy is as a whole based on best practice guidelines and is under pinned by on-going initiatives, programmes and positive actions to bring about improved employment monitoring figures with regular employment policy updates in order to reflect legislative and good practice developments.</p> <p>The installation of illuminated flashing lights to Translink School Buses.</p>	<p>Improved employment monitoring figures for 50+ and under 20 year olds.</p> <p>Subject to funding restraints from DRD.</p>	<p>n/a</p> <p>Annually.</p> <p>End of 2012</p>	<p>DRD policy states that the current practice is the only workable policy.</p> <p>Monitoring data collected from applicants.</p> <p>DRD</p>
Marital Status	Employment policies	Employment policies are constantly being reviewed and changed to ensure that people who are not married benefit in the same way as	n/a	On-going process	Group HR Department

		married people.			
Sexual Orientation	Gaps in qualitative and quantitative data collection.	On-going focus on establishing contact with organisations and groups to attend the Section 75 Reference Group and provide input into consultations. Continued monitoring of applicants for employment.	Improved data and possible Membership of the Section 75 Reference Group with a group involved with sexual orientation.	Within 1 year	On-going engagement and consultation with sexual orientation groups.
Gender	Under Representation of females in some occupational groups compared to the NI labour market.	Continued implementation of our family friendly employment policies including stating explicitly that applications from women are welcomed.	Higher percentage of females in some occupational groups within the Group.	Monitored Annually	NI Labour Market Monthly Labour Market Reports
Disability	Access to information Access to the transport system	Dedicated assistance for disabled passengers on our bus and train services (24 hour notice) with clear and accessible signage, including a pilot scheme in Bangor with additional visual aid flags on the wet floor signage. To meet the PSA/PFG/RTS targets through funding for new buses from DRD.	Refreshed travel safe guide. Increase in the number of journeys for people with	Summer 2012 2014	DRD DRD

	<p>Disabled people travelling on concession passes are not able to take advantage of discount vouchers and are therefore not entitled to any form of redress when they suffer a delay.</p> <p>Autism Act (NI 2011)</p>	<p>There is an opportunity to harmonise passenger redress across the network on a mileage/ time delay basis.</p> <p>Improved visual signage.</p> <p>Clearly structured public areas delineated by function.</p> <p>Assessments based upon social functioning, not merely mental and physical ability.</p> <p>Adjustments to “customer service” procedures that provide for people with ASD.</p> <p>Specific workforce ASD training to assist compliance.</p>	<p>limiting long term illness from 14%</p> <p>DRD Equality Scheme.</p> <p>Update of CPC Training delivered to customer facing staff</p>	<p>Annually</p> <p>End of 2013</p> <p>End of 2013</p>	<p>DRD policy states that the current practice is the only workable policy.</p> <p>Autism Act (NI 2011)</p>
With/ Without Dependants	Flexibility in how staff approach their working pattern.	Continued implementation of our family friendly employment policies which are particularly attractive to those with dependants.	Up take of various internal policies.	Annual Monitoring	

APPENDIX 1 (Extract from Translink Access Guide).

Translink Routes and Services

Translink is the main provider of public transport in Northern Ireland. We are dedicated to providing co-ordinated bus and rail services that are easy to use, reliable and comfortable. We are also committed to making sure that our services are safe and accessible to everyone.

The following sets out our current service levels for disabled people and those older people who may find using transport difficult. It contains information and advice on how to use our services, and contact details to help you plan your journey.

Metro is the name of bus services that run in and around Belfast.

Ulsterbus serves other towns and villages across Northern Ireland as well as services to and from Belfast.

Goldline is the express coach service that runs between towns and cities including a number of cross-border services.

Our bus and coach services run from 22 stations (many of which are staffed) Northern Ireland wide. We are also responsible for over 7,500 bus stops.

Our buses and coaches are a mix of accessible and non-accessible vehicles. 91% of Metro vehicles and 67% of Ulsterbus vehicles meet current accessibility standards. Only 45% of current Goldline coaches meet accessibility standards.

NI Railways Services

Rail services operate between Belfast and;

- Bangor
- Dublin
- Larne
- Londonderry
- Newry
- Coleraine
- Portrush

NI Railways manages 17 staffed stations and 5 staffed halts throughout the network, and runs rail services to and from three staffed stations in the Republic of Ireland.

NI Railways' trains consist primarily of Class 3000 CAF trains which entered service during 2004. These trains meet rail vehicle accessibility standards.

Information and Arrangements:

Arranging a Journey

We recommend that you plan your bus/rail journey before you travel as not all our buses, coaches and stations meet accessible standards. Accessible services are advertised in timetables.

Booking Assistance in Advance

If you wish to travel on a service not advertised as accessible, please call our Contact Centre 24 hours before you travel.

As we have a limited number of accessible coaches available, wheelchair users intending to travel on Goldline Services should call our Contact Centre 24 hours in advance.

Disabled passengers including wheelchair users travelling on Enterprise Cross Border Services should reserve a place 24 hours in advance of travel by phoning the Translink Contact Centre.

Staff Assistance

We can provide assistance at our staffed stations to help passengers to use our services. If you need assistance at any of our stations, we recommend that you call our Contact Centre at least 24 hours before you travel. NI Railways call at three stations in the Republic of Ireland.

We understand that sometimes you might need to travel at short notice and you won't always be able to let us know that you need assistance beforehand. In these cases we will do everything we can to assist but this may not always be possible. For details on how staff can assist you see Section 5 of this document.

Travel Information

You can get information about Metro, Ulsterbus and Goldline or NI Railways services online at www.translink.co.uk or by phoning our Contact Centre on **028 90 66 66 30**. If you are deaf or hard of hearing you can also contact us using

Type talk. If you are using a text phone you should dial **18001** followed by the full phone number.

Our Contact Centre is open every day from 7am to 8pm Monday to Friday and 8am to 6pm Saturday and Sunday. (Except Christmas Day and Boxing Day).

Published timetables are also available at bus and rail stations. Please ask if you would like any of our information in an alternative format (such as in braille, in large print, on disc or in another language).

Free and Half Fare Concession Passes

You can use the Half Fare Concession Pass to get cheaper travel on all NI Railways trains. The pass entitles you to a 50% discount on all standard single fares. Certain groups of people are entitled to free travel. For example, if you have a war disablement pension or are registered blind or are aged 60 and over.

On occasions there are lengthy queues at our ticket desks. If standing in a queue is difficult for you, a ticket for your journey can be obtained on the train.

You can find more information about free and cheaper travel on our website at **www.translink.co.uk** or by phoning our Contact Centre

Station & Halt Facilities

We have improved many of our main stations so they are more accessible to disabled people. The facilities now include:

- access into and around the station without steps;
- low-level ticket counters with an induction loop system;
- Accessible toilets;
- Audio and visual information systems;
- Clear and accessible signage; and
- A good level of lighting.

Facilities at smaller stations and our halts are more limited and at many halts there are no staff to provide assistance. Although we have made considerable improvements to our halts in recent years their design means that some disabled people will find them difficult to access.

Some of our accessible toilets are locked to stop vandalism and antisocial behaviour. If you need to use them, please ask the inspector in the station for a key (under the Radar Key Scheme). If you would like your own Radar key, you can get one by phoning Radar on **020 7250 3222** or by sending an e-mail to radar@radar.org.uk.

Changes to Facilities

If our station services or facilities have changed or have been removed, we will provide you with a reasonable and accessible alternative.

If we change something at short notice, (such as the platform a train departs from) we will do our best to make sure everyone knows and has enough time to act. This includes making audio and visual announcements and providing passengers with appropriate assistance if required.

We will not close any station entrances if doing this might make it more difficult for you. We will check this with IMTAC, Disability Action, and other passenger user groups.

Car Parking at Stations

Where we provide parking, we will provide accessible parking spaces for 'Blue Badge' holders. We will check these spaces are not being misused. If people use accessible parking spaces when they are not entitled to, we will put a notice on the vehicle to explain what accessible parking bays are for. We will check the design, location and amount of accessible parking spaces at our stations to make sure they meet your needs and make changes where necessary.

If other transport services are available at our stations, we will try our best to make sure you can use them. Our staff will provide any assistance you need getting to and from other transport service.

Buses and Coaches

Accessible buses can be single or double deck vehicles. Accessible buses have the following features:

- Low-floors with kneeling facility and ramped access;
- Non slip surfaces on floors;
- Colour contrasting materials inside and out;

- Highly visible route information on the front, side and rear;
- Good handrail provision inside the bus;
- Dedicated space for one wheelchair user; and
- Five other priority seats for the use of disabled people.

All our accessible buses are designed to accommodate wheelchair users whose chair is up to 700mm wide, 1200mm long and 1350mm high. If your chair (or powered mobility scooter) is not within these measurements you will have difficulty using the bus. If you are not sure, please call our Contact Centre.

Metro

Most Metro buses are accessible, but some Metro buses are older and have steps. They will not have the accessible features listed. Metro timetables indicate the routes which use accessible vehicles using a wheelchair user symbol and the message “operated by low-floor vehicles”.

Ulsterbus

Ulsterbus services use a mix of vehicle types. Some types meet accessibility standards and have all the features listed. Ulsterbus timetables indicate the routes which use accessible vehicles using a wheelchair user symbol and the message “operated by low-floor vehicles”. Some older buses have steps and none of the listed accessibility.

Goldline

Most of our Goldline coaches may be difficult for disabled passengers to use because they have high floors and steps.

We do have 25 double-decked coaches that meet accessible standards. These have low floors, ramps, non-slip flooring, colour contrasting materials, hand rails, space for one wheelchair user and five priority seats for the use of disabled people in the lower deck.

We are also introducing 20 single deck coaches that meet accessibility standards. These coaches have the same facilities as our low-floor coaches but have steps with access for wheelchair users via a lift.

Trains

We use four types of trains. The facilities available on each are different. All our trains are accessible to wheelchair users, have ramps to assist passengers when boarding and other priority seats on-board for the use of disabled people.

CAF 3000 trains operate mainly between Portadown and Belfast, Bangor and Belfast and Londonderry and Belfast. These trains meet rail vehicle accessibility standards including dedicated space for two wheelchair users, priority seating for disabled people, audio and visual announcements, automatic doors, an accessible toilet and colour contrasting materials both inside and outside.

Class 80 and 450 Class trains are used on the Larne Line and on the Portrush branch line. These trains are accessible to wheelchair users but **do not** have other facilities such as an accessible toilet or audio or visual announcements. Some of these trains have heavy slam doors.

De Detrich trains run on the cross border services between Belfast and Dublin. These trains have two dedicated spaces for wheelchair users, have an accessible toilet and audio and visual announcements.

Bus drivers will announce bus stops on request.

If facilities on our trains are out of order (for example, toilets with access for wheelchair users) and this directly affects any disabled passengers, we will do our best to make sure that passengers know about it before they get on the train.

Sometimes we have to temporarily replace our trains with buses. When this happens we will do our best to provide accessible vehicles so that passengers with disabilities can use them. However, if we cannot provide suitable buses, we will do our best to make other suitable arrangements at no extra cost to the passenger.

On Board Assistance

Our staff are aware of disabled passengers and will offer the appropriate assistance if needed, but our drivers are limited in how they can help.

Metro, Ulsterbus & Goldline:

We guarantee that drivers of vehicles will do at least the following:

- Stop the bus for passengers waiting at bus stops who may have difficulty identifying or hailing services – for example a passenger who has a visual

impairment and is carrying a white cane.

- Lower the vehicle, use the ramp or use the lift to help you onto the bus or coach.
- Clear anything that is in your way to help you get onto the bus or coach, including the wheelchair user's space.
- Ask passengers occupying priority seats, including the wheelchair user's space, to move if they do not need to use them.
- Where appropriate fit your wheelchair with restraints provided – these are only available on buses and coaches where the wheelchair user faces forwards.
- Welcome guide and assistance dogs and their owners onto all Metro, Ulsterbus and Goldline services.
- Keep the bus still until you have safely got on the bus and settled into a seat.
- Bus drivers will announce the arrival of the bus at stops on request.
- Carry a pen and paper to help communication.

NIRailways

Staff at our stations and staff on board trains are trained to offer and provide appropriate assistance to disabled passengers:

- Provide assistance getting on and getting off the train, deploying the ramp, assisting passengers with luggage and when changing trains.
- Ask passengers occupying priority seats, including the space reserved for wheelchair users, to move if they do not need to use them.
- Welcome guide dogs and other recognised assistance animals on all areas of our trains.
- Carry a pen and paper to help communication.

We provide catering facilities on our cross border trains. If you cannot access this area, our on-board staff will be happy to bring refreshments to your seat.

On Board Information

All our trains have audio announcements. Some newer trains also have visual displays of information as well as audio announcements. Where visual displays are not available we can arrange for staff to inform you of things like delays. This might be useful to you if you are deaf or hard of hearing. If our audio announcements are not working we will arrange for on-board staff to let you know when we reach your destination or about any delays. This might be useful to you if you have a visual impairment. Please let the on-board member of staff know if you think you might require this assistance.

If you experience any difficulty whilst travelling on our trains our on-board staff are there to assist. On-board staff can contact other NIRailways staff if required. For example if the train is severely delayed we can make other travel arrangements for customers or contact relatives or friends who may be waiting for passengers.

Evacuation Arrangements

We know that disabled passengers may need particular assistance if we have to get people off a train or out of a station quickly in an emergency.

We have written procedures for our station and on-board staff to follow in such circumstances, and these procedures include arrangements for assisting disabled passengers.

Your Comments

We welcome comments about any part of our service, including information when things go wrong. You can contact any member of our station staff or contact us by phone/type talk, in writing, or by e-mail in one of the following ways.

Text phone: 18001 - 028 90 66 66 30

(Available during normal office hours).

Email: feedback@Translink.co.uk.

We will normally respond to you in writing, but please ask us if you would like us to reply in another way.

Translink has 10 Passenger Groups across Northern Ireland. We would like disabled people to become members of these groups. We will work with IMTAC and other organisations to promote the Passenger Groups to disabled people.

You can also get copies of the Translink Access Policy Document free of charge from our website at www.translink.co.uk and from all our stations. You can also get this Access Guide in alternative formats by calling the Translink Contact Centre.

Station Facilities

Most accessible stations would have all of the following features:

- Step free access around the station
- Easy access around all facilities for wheelchair users
- Staff available to provide assistance
- Accessible ticket offices
- Well-designed timetable information available
- Hearing loop system
- Sheltered waiting facilities and seating
- Accessible information boards
- Audio announcements
- Accessible toilets
- Accessible parking
- Tactile surfaces including edging on platforms
- Other accessible transport such as taxis available

There are five categories of station.

1. Staffed station with all facilities listed
2. Staffed / Unstaffed station with most facilities
3. Staffed / Unstaffed station with restricted access
4. Unstaffed station with ramped access
5. Unstaffed station with basic access

If you think you may need assistance we recommend you call in advance to book assistance.

APPENDIX 2

Audit of Inequalities Timeline and Action Measures

