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

Edited in June 2021 subject to Audit of Inequalities and 5-year scheme review

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 NITHCo. 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 Chairperson 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.

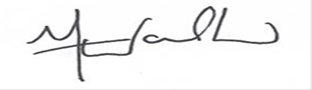
We realise the important role that the community and voluntary sector and the general public have to play to ensure the Section 75 statutory duties are effectively implemented. Our equality scheme demonstrates how determined we are to ensure there are opportunities, for people affected by our work, to 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.

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1 See section 1.1 of our Equality Scheme





Dr Michael Wardlow Mr Chris Conway

Chairperson Chief Executive Officer

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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 4 around 4,000 staff throughout Northern Ireland.

The Board of Northern Ireland Transport Holding Company is responsible to the Department for Infrastructure 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 10)

Chapter 4 (Page 14)

Chapter 6 (Page 27)

Chapter 8 (Page 25)

Chapter 10 (Page 28), and

Appendix 4 (Page 34)

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 Chief Human Resources and Corporate Services Officer at the address given below and we will respond to you as soon as possible:

Mr Gordon Milligan

Chief Human Resources and Corporate Services Officer

22 Great Victoria Street Belfast

BT2 7LX

Tel: 02890 243456

Phone: 02890 666630 (Connects to the Translink Call Centre)

Email: [gordon.milligan@translink.co.uk](mailto:catherine.burns@translink.co.uk)

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

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

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.

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](http://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 February 2013 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 Chief HR and Corporate Services Officer 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 and Rail operations, Legal, Finance (Procurement), Commercial and Infrastructure and Projects, 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 9 passenger groups: 6 for bus and 3 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 NITHCo 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.

2.18 Once finalised, our action plan will be available at [www.translink.co.uk.](http://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.

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.

# 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:

* 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 commitments.

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.

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

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 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](http://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.

7 Please see Appendix 3 for a list of consultees.

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

# 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 mitigation 9 or an alternative policy proposed to be adopted
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.

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Mitigation9 – 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

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](http://www.translink.co.uk/)

And on request or by using the contact details referenced on Page 8of 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](http://www.translink.co.uk/)

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

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.

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 monitors all applicants for posts in terms of community background, age, gender, marital status, racial group, sexual orientation and disability. Monitoring by racial group was introduced more recently.
* 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.

# 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 an effective communication and training programme for all staff that ensures 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 also been incorporated into induction training.

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.

# 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.

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 9 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 8of 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 8of this scheme.

9.2 Our equality scheme is also available on our website at: [www.translink.co.uk](http://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.
* 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 withdisabilities 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](http://www.translink.co.uk/) or by using the contact details referenced on Page 8of this scheme.

# Chapter 10: Review of our equality scheme

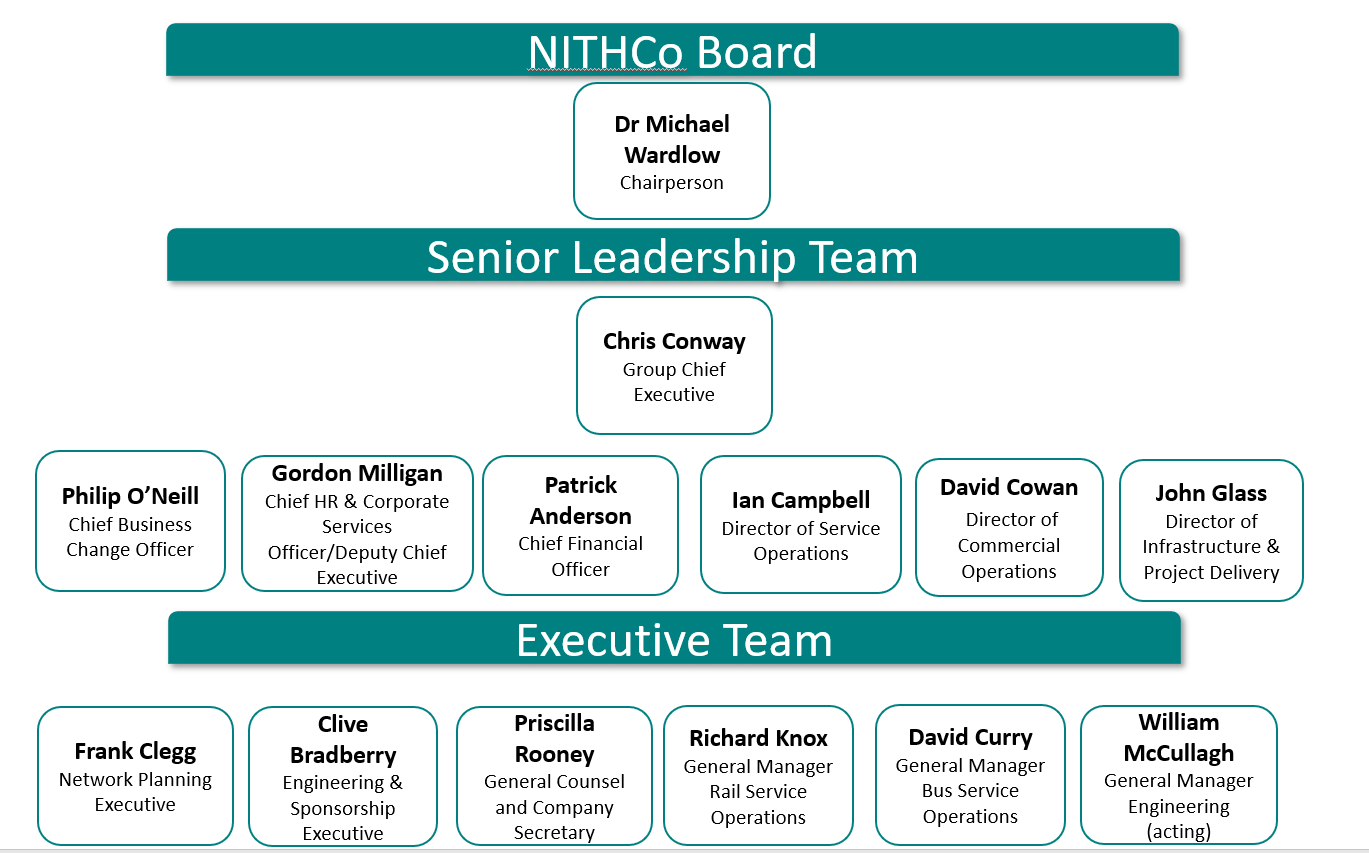
(Schedule 9 8. (3))

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 Fair Employment & Treatment (NI) Order10. Therefore, “religious belief” also includes any perceived religious belief (or perceived lack of belief) and, in employment situations only, it also covers any “similar philosophical belief”.

Political opinion11 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.”

# Appendix 3: List of consultees

(Schedule 9 4. (2) (a)

|  |
| --- |
| Action on Hearing Loss (trading name of RNID) |
| African Cultural Centre (NI) |
| Age NI |
| Age Sector Platform |
| Alliance Party of NI |
| Antrim and Newtownabbey Borough Council |
| Ards and North Down Borough Council |
| Armagh City, Bandbridge and Craigavon Borough Council |
| Autism Northern Ireland |
| Barnardo's |
| Belfast City Council |
| Belfast Harbour Commissioners |
| British Deaf Association (NI) |
| Bryson Intercultural+A33+A33 |
| Cara-Friend |
| Cara-Friend Lesbian Line |
| Cara-Friend LGBTQ + Youth Gay and Lesbian Youth NI (GLYNI) |
| Carers Northern Ireland |
| Causeway Coast and Glens Borough Council |
| CBI Northern Ireland |
| Children in Northern Ireland (CiNI) |
| Children's Law Centre |
| Church of Ireland |
| CO3 (Chief Officers 3rd Sector) |
| Coalition on Sexual Orientation |
| Committee on the Administration of Justice |
| [Community Relations Council](mailto:info@nicrc.org.uk) |
| Council for Catholic Maintained Schools |
| Democratic Unionist Party |
| Department for Communities (DfC) |
| Department for Economy (DfE) |
| Department for Education (DE) |
| Department for Infrastructure (DfI) |
| Department of Agriculture, Environment & Rural Affairs (DAERA) |
| Department of Finance (DoF) |
| Department of Health (DoH) |
| Department of Justice (DoJ) |
| Derry City and Strabane District Council |
| Derry City and Strabane District Council |
| Disability Action |
| Down's Syndrome Association |
| Education Authority (EA) |
| Employers for Disability NI (EFDNI) |
| Equality Coalition |
| Equality Commission for Northern Ireland |
| Federation of Small Businesses |
| Fermanagh and Omagh District Council |
| FPA NI (Family Planning Association NI) |
| Guide Dogs (NI) |
| Inclusive Mobility Transport Advisory Committee (IMTAC) |
| Indian Community Centre |
| INSPIRE |
| Irish Traveller Movement |
| Lisburn and Castlereagh City Council |
| Local Government Staff Commission for NI |
| Londonderry Port & Harbour Commissioners |
| Mencap |
| Methodist Church in Ireland |
| Mid and East Antrim District Borough Council |
| Mid Ulster District Council |
| Newry, Mourne and Down District Council |
| NI Anti Poverty Network |
| North West Community Network |
| North West Forum of People with Disabilities |
| Northern Ireland Assembly |
| Northern Ireland Committee Irish Congress of Trades Unions (NIC -ICTU) |
| Northern Ireland Council for Intergrated Education (NICIE) |
| Northern Ireland Council for Voluntary Action (NICVA) |
| Northern Ireland Gay Rights Association (NIGRA) |
| Northern Ireland Human Rights Commission |
| Northern Ireland Public Service Alliance (NIPSA) |
| Northern Ireland Youth Forum |
| NSPCC (NI) |
| Presbyterian Church in Ireland |
| Press for Change |
| Progressive Unionist Party |
| Queer Space |
| Royal National Institute for the Blind Northern Ireland (RNIB NI) |
| Save the Children (NI) |
| Simon Community (NI) |
| Sinn Fein |
| Social Democratic & Labour Party (SDLP) |
| The Cedar Foundation |
| The Consumer Council |
| The Executive Office (TEO) |
| The Green Party (NI) |
| The Institute of Directors |
| The Omnibus Partnership |
| The Rainbow Project |
| The Workers Party |
| Ulster Unionist Party |
| UNISON |
| Warrenpoint Harbour Authority |
| Warrenpoint Harbour Authority |
| Women’s Aid Federation NI |
| Women's Resource & Development Agency |
| Women's Support Network |
| Youth Council For Northern Ireland |

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 | 31st August Annually |
| 2.12 | Audit of Inequalities | Equality Officer | December 2020 |
| 2.15 | Consultation with our stakeholders and Consultee List | Equality Officer | December 2020 |
| 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 2021 |
| 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 |
| 4.3.1 | Annual Review of our monitoring  information | Equality Officer | Annually |
| 4.3.3 | Publication of Monitoring results | Equality Officer | Annually (31st August) |
| 5.3 | Ongoing delivery of a detailed training programme | Equality Officer | Annually |
| 5.4 | Development of Summary Equality Scheme for all staff and Board Members | Equality Officer | Within one month of scheme publication |
| 5.4 | Focused training for key personnel tasked  with taking forward the scheme | Equality Officer | Within one  month of scheme publication |
| 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 publication |
| 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, aall 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.

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 that it treats (or, would treat) other people to whom that reason does not (or, would not) apply.

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:

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;

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 - Audit of Inequalities and Action Plan

Northern Ireland Transport Holding Company

September 2020

Completed by:

Dorothy McKee Consulting

On behalf of:

Northern Ireland Transport Holding Company (NITHCo)

Executive Summary

The audit of inequalities is the second audit the Northern Ireland Transport Holding Company (NITHCo) has undertaken and it covers the period 2015-2020. The purpose of the audit is to provide a strategic picture of inequalities. The audit takes account of the social and economic inequalities that constitute the backdrop for the activities of NITHCo) in terms of public transport in Northern Ireland.

NITHCo is a large and complex organisation. As the main provider of public transport in Northern Ireland it provides an essential public service that has the potential to impact on social inclusion, health, business, education and overall quality of life. In this audit of inequalities there is evidence that NITHCo has been proactive in demonstrating a commitment to fulfil its Section 75 obligations across the organisation including its subsidiary companies (Metro, NI Railways and Ulsterbus) who operate under the brand name Translink.

Notwithstanding the commitment of the NITHCo Board, Executive Group and Senior Management to fulfil their duties under Section 75 of the NI Act (1998), the organisation must balance operating on a quasi-commercial basis as a Public Non-Financial Corporation. On the one hand the organisation has a degree of commercial independence but also must operate within the policy framework of the Department for Infrastructure (DfI) as set out in the Public Service Contract (PSC).  The PSC defines the Infrastructure Network that Translink must operate within, in line with relevant DFI legislation. Despite challenges in terms of funding over the last number of years, through good practice, efficiencies have been achieved and an increase in passenger numbers evidenced (Annual Report 2018/19).

Through the implementation of the NITHCo Equality Scheme the corporate Equality Working Group takes a strategic approach to mainstreaming equality into policy development and review across the organisation. The Equality Working Group has enhanced governance arrangements for the implementation of Section 75 through providing a scrutiny function. A structured and rigorous approach is now taken to screening across the organisation and to the importance of paying due regard to the importance of promoting equality of opportunity at an early stage in policy development processes and infrastructure projects.

The adoption of a strategy on corporate responsibility by NITHCo has contributed to mainstreaming Section 75 into how the organisation does business. The organisation has been proactive in building relations with local communities and in meeting the inequalities faced by some sections of the community. A commitment is given in the CR strategy to go beyond compliance in considering the impact of the organisation on society and to engage in CR activities as the “right thing to do”. Partnerships have been forged with those representing the Section 75 groups, community groups, the voluntary and community sector, local councils, community planning partnerships and schools in taking a joined-up approach to promoting equality and good relations.

NITHCo has continued to promote equality in the workforce through specific targeted equality and good relations training for frontline staff, all new employees and through the leadership competency framework. A draft Equality, Diversity and Inclusion Strategy has been developed to target specific Section 75 groups in the workforce where further action is required. Good practice in the promotion of equality and diversity in the workforce is also monitored and reviewed by the Equality Working Group.

The Equality Scheme has provided a useful framework for: integrating Section 75 into the future corporate strategy, policy development and review processes; for developing training and ensuring staff are aware of their responsibilities and enhancing how the organisation consults and engages with a range of those representing Section 75 groups.

Through conducting this audit of inequalities NITHCo has documented how the organisation has implemented and enhanced commitment to promoting equality and good relations over the last five years. The audit has also provided a useful opportunity to reflect on good practice in implementing Section 75 of the NI Act and learn where targeted activities are needed going forward.

Strong evidence is demonstrated in the audit of a comprehensive and proactive approach to promoting equality and diversity in the workforce while also recognising that more needs to be done. The draft strategy on Diversity, Equality and Inclusion includes a commitment to actions to further promote equality in terms of gender, disability and the LGBT community.

Through the consultation process for the audit some areas have been identified for consideration of the Working Group that would ensure a targeted and proactive approach is taken to promoting equality of opportunity for users of public transport with disabilities, dependants, older people and those from ethnic minority communities.

It is recognised in the audit that considerable good practice in the promotion of equality and good relations has been achieved through extensive engagement with local communities and representative groups, on infrastructure and fleet projects, on changes to ticketing arrangements, on the implementation of changes to vehicles and upgrade of the website. Positive partnerships and consultation arrangements are implemented with young people, older people, those with a wide range of disabilities and of different community backgrounds.

Notwithstanding the positive measures that have been taken in areas since the last audit actions have been identified where the organisation can continue much of the positive work that is ongoing and further enhance the promotion of equality. The measures identified in this audit build on the positive foundation that has been put in place and leadership commitment to Section 75 that has been implemented over the last five years.

SECTION ONE

Background to the Audit of Inequalities

In 2012 the Equality Commission for Northern Ireland published advice to public authorities on conducting an audit of inequalities. The Commission recommends that the audit of inequalities undertaken by public authorities should be consistent with other approaches to review and evaluate performance to make decisions about the way forward and to prioritise actions over time within available resources. The audit is a strategic view of promotion of equality of opportunity and good relations both internally and externally in terms of service delivery. The audit and action plan have been undertaken using the Equality Commission’s six stage process in undertaking an audit of inequalities and action plan.

The current audit of inequalities was undertaken through a comprehensive review of quantitative and qualitative data held by the organisation on the Section 75 groups through monitoring, screening reports and annual reporting on Section 75. Extensive research was carried out on Equality research undertaken by the Equality Commission, research on good practice in promotion of equality of opportunity and public transport and NISRA statistics. Data was also collected through targeted interviews with internal personnel across the organisation, the Equality Working Group and representatives of the 9 section 75 groups.

The audit of inequalities has enabled the organisation to identify the progress that has been achieved since the last audit was undertaken, to identify areas where gaps still exist and actions needed to further promote equality of opportunity and good relations. The findings in the audit will inform the development of an Equality Action Plan that will be reviewed in conjunction with the corporate planning cycle.

Action Plan Development

The previous action plan was focused mainly on the compliance aspects of Section 75 and on promotion of equality of opportunity in the workforce and on measures to promote equality of opportunity in access to public transport for older and younger people, for those with disabilities and for those people from ethnic minority communities.

SECTION TWO

Responsibilities and Functions

NITHCo is a large and complex organisation employing just over 4,000 people. The organisation faces demanding challenges in complying with the policy of the Department for Instructure, operating as a quasi-commercial organisation and implementing severe annual reductions in funding in the current environment.

Due to the high public facing nature of the organisation as the sole provider of public transport in Northern Ireland it has a major impact on the quality of life of a large section of the community in in terms of work, health, education and leisure. Given the nature of the services the organisation provides ensuring safe working practices, providing efficient quality services and sound financial management are key priorities.

NITHCo owns and controls seven private limited subsidiary companies and trades jointly as Translink and is Northern Ireland’s main provider of public transport.

NITHCo is a public corporation and its responsibilities include holding and managing property assets and the oversight of its private limited subsidiary companies. The organisation is expected to operate commercially and has a duty to operate in accordance with Ministerial policy.

NITHCo was established under Section 47 of the Transport Act (Northern Ireland) 1967. Under this legislation the NITHCo has a chairman and eight Directors who are appointed by the Minister.

The organisation carries around 85 million passengers annually and is a major Northern Ireland employer; land manager; and significant user of energy, fuel, water, and a wide range of consumables and other resources. A commitment has been given by the organisation to take responsibility for the impact they have on its stakeholders and the community it serves. It has been stated that the organisation intends to go beyond compliance to act as a corporate citizen as it is acknowledged that this is the right thing to do.

The executive and senior management team have effectively integrated objectives and targets relating to equality into corporate strategy and operational plans and this is evidenced in the Corporate Strategy “Get on Board” 2016-2021 and Group Corporate Responsibility Strategy 2017-22.

The promotion of equality and good relations is endorsed in the organisational values of Safety, People, Innovation, Responsibility, Integrity and Teamwork. The Group Chief Executive and Senior Management take every opportunity to acknowledge staff who behave in accordance with the values. The leadership in the organisation is committed to mainstreaming Section 75 and in making it part of how the organisation does business.

In the 2016-2021 strategy “Get on Board” there is recognition of the importance of public transport in enhancing local communities and supporting social inclusion. Public transport is seen as an important catalyst in promoting social inclusion for older people, those with disabilities and many people who do not have access to a car helping them to participate more fully in society. A commitment is given in the corporate strategy to working with stakeholders to promote social inclusion and strong neighbourhoods with a sense of pride. Over the period of the strategy considerable investment has been made by the organisation to consult and engage with local communities and with older people, younger people and those with a disability where changes to public transport has been planned such as the introduction of the Glider, Belfast Hub, upgrades to stations and to railway lines and new innovative approaches to ticketing and to promoting a greater understanding of mental health awareness.

The commitment to working in partnership with stakeholders to enhance access to quality public transport also extends to committing to working with local councils through their community planning processes to ensure there is consideration of regional and local issues in terms of public transport.

Partnerships have also been established with Education and Health to ensure that the organisation is responsive to the needs of a large customer base that is reliant on public transport.

Internally there is a commitment to creating a diverse workforce and a culture of respect that recognises the importance of empowering staff to generate new ideas and creative solutions. Positive progress has been demonstrated in the annual staff engagement survey in employee responses on whether they felt the organisation promotes a positive attitude towards people with a disability and those of different genders. 70% of staff indicated they felt the organisation promotes positive attitudes to those with disabilities and 71% of staff felt it promoted positive attitudes on gender equality.

Considerable investment has been made in Equality and Diversity training for staff and targeted initiatives to address areas where there was a need to address under-representation in the workforce. A new comprehensive draft strategy on Equality, Diversity and Inclusion includes targeted initiatives to promote equality of opportunity.

Through the Corporate Responsibility Strategy the workforce has engaged in activities to promote and raise awareness of equality of opportunity such as: engagement of staff and senior management in Belfast Pride, Have a go Day to encourage females to apply for jobs as bus drivers; mental health initiatives for employees and passengers. Extensive training has also been provided to front-line staff on equality and all staff are trained and updated on equality matters on an ongoing basis.

Section 75 is integrated into procurement practices in the organisation. Examples include the Belfast Hub where all private sector companies involved in the project had to reflect how Section 75 considerations had been integrated into the designs. The organisation has also been recognised in the (Go) Excellence in Public Procurement Awards Northern Ireland BUY Social Sustainable procurement services.

SECTION THREE

Consideration of Available Data

An extensive desk research exercise was undertaken of the documentation listed below.

* The Equality Scheme
* The Annual reviews and reports to the Equality Commission on Section 75 and Disability Duties
* Article 55 Reviews
* Staff surveys
* Draft Equality Diversity and Inclusion Strategy and Action Plan
* Research undertaken for the BITC “Gender Imbalance” project
* The workforce profile of Translink
* Feedback from Public Consultation undertaken by Translink relevant to the promotion of equality
* Policy documentation from the Department of Infrastructure relevant to Section 75 and targets in the Draft programme for Government
* New Decade New Approach
* Demographic information and relevant stratified information on current and/or targeted customers.
* Audit of Inequalities and any information on key inequalities previously identified
* Any relevant monitoring information
* Relevant NISRA statistics
* Surveys such as Continuous Household Survey
* Consultation undertaken with IMTAC and Disability groups on the delivery of the Accessible Transport Strategy
* The strategy on Corporate Responsibility
* The Translink Strategy Get on Board 2016-2021
* The Annual Report and Account 2018/19
* Data collected by local authorities across Northern Ireland as part of the Community Planning process
* Research reports on Equality and Good Relations undertaken by the Equality Commission relevant to public transport

A summary of the main themes identified in relation to the nine Section 75 categories is included in Appendices 1,2 and 3.

Consultation was undertaken with a key representative on IMTAC and with those who represent ethnic minority communities. The officers interviewed provided information on Section 75 issues that had emerged through the extensive consultation undertaken in the consultation Forums such as IMTAC, the Youth Forum, Seniors Parliament, the Consumer Council and with local community groups.

Consultation was also undertaken with named staff in the organisation with responsibility for overseeing and implementing Section 75, with key representatives on the Equality Working Group, the Access Manager, the Head of Corporate Communications, the Head of Marketing and Business Development and Head of Procurement. Strategic input on Section 75 was provided through semi-structured interviews with the Equality and Diversity Adviser, Head of Reward and HR Services, Chief Human Resources and Corporate Services Officer (Deputy Chief Executive) the Director of Commercial Operations, Director of Service Operations and Infrastructure and Projects Executive.

SECTION 4

Assessment of Inequalities by Section 75 categories

Religion

It was noted in the previous audit of inequalities that it was not deemed appropriate to capture information on religion, political opinion, and sexual orientation through face to face interviews conducted for the customer survey, due to the sensitivities involved. Monitoring information on the religious composition of the passengers on public transport is not therefore captured as part of the monitoring undertaken for the customer charter.

In the DFI (formerly, Department for Regional Development) travel statistics (as noted in the last Translink audit of inequalities) the proportion of both communities using public transport was the same at 4%. It was however noted by DFI in their 2011 audit of inequalities that there may be a religious belief impact associated with the differential uptake of concessionary fares in the west compared to the east.

Extensive public consultation is undertaken in areas where new modes of public bus and rail transport are being introduced and or capital developments to stations planned. For example, consultation was undertaken with local communities in relation to the Belfast Hub with community groups in the Grosvenor Road/ Roden Street/Sandy Row areas. The recruitment team also hosted careers and employment workshops with the community groups in the area to promote job opportunities in Translink and encourage local applicants. The workshops helped to build relations between the community and Translink in each area.

Major consultation exercises were also undertaken prior to the introduction of the Belfast Rapid Transit (BRT) Glider. The new Glider service links East and West Belfast and the Titanic Quarter via. the City Centre and provides people with improved access to jobs, hospitals, shops, schools, colleges and entertainment.

Extensive community consultation was undertaken with local community groups for over twelve months in the Lurgan area prior to the introduction of changes to the rail services.

Area user groups also form an important part of the engagement in Translink and user groups are in existence in the following areas across Northern Ireland.

|  |  |
| --- | --- |
| **Metro Panel** | Covering metro services |
| **Interurban Rail Panel** | Covering Ballymena, Larne, Bangor and Portadown Lines |
| **North West Rail Panel** | Covering Coleraine and Derry~Londonderry Lines |
| **Cross Border Rail Panel** | Covering services between Newry and Dublin |
| **North West Bus Panel** | Including local Goldline, Foyle Metro Limavady and Omagh areas |
| **South West Bus Panel** | Including Enniskillen, Dungannon and Craigavon areas |
| **North Down Bus Panel** | Including Ballymena, Larne, Antrim, Carrickfergus, Magherafelt and Randlestown areas. |
| **South East Bus Panel** | Including Lisburn, Lurgan, Portadown, Armagh, Downpatrick, Newry and Newcastle areas |

In the transport survey for Northern Ireland 2016-18 it was noted that the two highest district council areas where cars are not the main mode of transport are Belfast City Council and Derry and Strabane District Council. 42% of people in the Belfast City Council area and 33% in Derry City and Strabane District Council walk to work or use public transport as opposed to a NI average of 25% across Northern Ireland. Across a range of district council areas outside of Belfast and Derry and Strabane District Council areas commitments have been given in the Council Community Plans to enhance usage of public transport. Translink has given an undertaking in their corporate strategy 2017-2022 “Get on Board” to work in partnership with councils in the delivery of their community plans.

It was agreed with the Equality Commission to undertake an annual Article 55 review of the workforce across the NITHCo and associated organisations. Therefore, a detailed analysis of the religious composition of the workforce is undertaken each year. The annual monitoring returns indicate that there has been a positive increase in the number of applicants and those shortlisted from the Catholic Community. In the 2018 Engagement Survey 66% of employees felt that the organisation values diversity a 2% increase from the previous survey. No further action in relation to affirmative action on the religious composition of the workforce has been deemed necessary at this time. A commitment has however been given in the Equality Diversity and Inclusion strategy to undertake further analysis against the updated census data to establish if action is necessary.

Actions

To continue to support DfI in the implementation of concessionary rates across the community in NI

Liaise with local councils on their community plans in line with their timetables and consultation process to encourage participation in the use of public transport.

To monitor if there is fair participation from the two main communities in the workforce when the new census data is available.

Political Opinion

Monitoring information on the political opinion of the passengers on public transport is not captured as part of the monitoring undertaken for the customer charter. It was however noted in the previous five-year review that it was not deemed appropriate to capture information on religion, political opinion, and sexual orientation through face to face interviews conducted for the customer survey due to the sensitivities involved.

There is a tendency in Northern Ireland for the voting patterns to reflect the religious composition in the district councils and this is once again reflected in the most recent elections apart from the gains by some of the smaller parties such as Alliance and the Green party. The issues identified in terms of religious opinion are therefore also deemed relevant in terms of political opinion.

It is of note that in engaging with the workforce there are a significant number of forums within Translink to facilitate engagement with the unions. The forums cover all employees at all levels.

Actions

As above

Sexual Orientation

Monitoring information on the sexual orientation of the passengers on public transport is not captured as part of the monitoring undertaken for the customer charter. It was however noted in the previous five-year review that it was not deemed appropriate to capture information on religion, political opinion, and sexual orientation through face to face interviews due to the sensitivities involved.

The organisation has been proactive in demonstrating their support for the LGBT community through senior personnel and staff participating in the annual Pride Event. It has been acknowledged that further targeted internal initiatives are required and a recent commitment has been given to become a member of Stonewall. In the Draft Equality Diversity and Inclusion Strategy a commitment is given to establish an LGBT working group in the organisation to feed into the organisation’s values on promoting a diverse workforce.

Actions

To implement the actions in relation to sexual orientation in the Draft Equality Diversity and Inclusion Strategy.

* Obtain membership of Stonewall February 2020
* Partake in Belfast Pride August annually
* Create an LGBT network within the organisation
* LGBT network feed into the Diversity Agenda 2021 ongoing

To confirm if the Department for Infrastructure is capturing information on the travel needs and issues for people from the LGBT community in the Transport survey and if so to consider any information arising.

Consideration of relevant questions in engagement survey

Race

Limited quantitative data is available on racial groups and public transport. Extensive consultation undertaken for screening on the new automated ticketing arrangements confirmed that the system for purchasing tickets could potentially enable those whose English was not their first language to more easily purchase tickets and use public transport without need for passenger staff interaction. Additional languages are being made available when using vending machines and ability to translate online information and transaction data when purchasing tickets and toping up smartcards.

Metro, NIR and Ulsterbus successfully provided public transport on special and scheduled services to and from major events through the year including Belfast Mela and Culture night.

Translink has been awarded UK Bus Bronze Awards for “Putting customers first”. On the Belfast Airport Express 300 service, new buses have been introduced with a/v displays in French, German and Spanish.

Training is provided for all customer facing staff. World Host training is being rolled out across all frontline staff and they receive specific training on delivering services across cultures. All Glider staff and cross-border rail staff have completed this specific module and there are proposals to roll this training out across all staff. There is also ongoing assessment for staff on the application of the learning in practice.

In the consultation undertaken as part of the audit of inequalities it was recommended that cognisance be taken of the needs of migrant workers in terms of public transport and the potential for harassment or victimisation and or race hate incidents.

Within the workforce it is noted that in 2018 there was an increase in applications for vacancies from ethnic minority communities.

ACTIONS

To explore sources of data available on ethnic minority workers and migrant workers and the use of public transport.

To analyse the revised census data when available and compare the representation of people from ethnic minority communities in the workforce and identify relevant actions.

Disability

In the United Nations Convention on the Rights of Persons with Disabilities Jurisdictional Parallel Report on the Implementation of NI working paper August 2017 it was noted that problems with transport have been identified as a persistent issue limiting disabled people’s ability to live independently. Barriers include the unaccommodating hours of door-door public transport services, lack of physical access to public transport, prohibitive costs of private transport and the lack of understanding and awareness of disability by many people who work for public transport

In the DfI Travel to Work Survey 2016-2018 19% of the respondents said they have some difficulty with travel due to a physical disability or long-standing health problem.

Research commissioned by the Equality Commission for NI in 2017 reported that “Disabled people had experienced barriers to accessing everyday services such as transport. It was noted that barriers are not just about physical access to buildings and vehicles. For many people poor services and the attitudes of the staff providing the services can be a major deterrent to using services.

It is also of note that in research commissioned by the Equality Commission in 2019 on Equality in Public Life Northern Ireland it is noted in a report by Disabled People’s Voices that while improvements have been made to public transport there was still “some way to go before disabled people could travel routinely by bus or train”,

In the NISRA continuous Household survey 2018/19 it was noted that those respondents who have a disability are more likely to use a hardcopy timetable (40%) and Translink call centre (16%) than those who do not have a disability (32% and 11% respectively). Moreover, respondents who do not have a disability were more likely to be aware of the availability of timetables on the Translink website 66% journey planner on a PC or laptop 34% and journey planner mobile app. 35% when compared to those with a disability 49%,25% and 25% respectively. Just over a quarter 26% of respondents who have a disability were not aware of online journey planning resources compared with 16% of those with no disability. Notwithstanding the fact that those with disabilities are less likely to use the online information according to the survey findings Translink has worked in partnership with IMTAC on the development of a new website and ecommerce platform that has achieved AA (web accessibility standard).

Translink has regular contact with the DfI Inclusive Mobility and Transport Advisory Committee (IMTAC) regarding the accessibility of public transport for people with disabilities. Through the close working relationship with IMTAC a wide range of issues of importance to disabled people can be discussed in detail and IMTAC have input into the way initiatives are developed. Through the involvement with IMTAC officers have access to a wide range of groups representing people with disabilities and older people. Consultation is also ongoing with IMTAC on how information provision on transportation issues can be improved for people with disabilities. The Translink Disability Accessibility Officer continues to actively work with IMTAC to ensure ongoing feedback from service users and user groups and the accessibility steering group that includes representatives from Disability Action, the Consumer Council and other associated groups.

In the Translink Disability Action Plan 2017-2022 a commitment has been given to encourage people with a disability to participate in user groups and consultation meetings by providing information and drawing attention to new opportunities. In addition, in the Annual Communication Plan there are actions around involving close engagement and consultation with groups such as people with a disability and older people.

In the Translink Corporate Strategy “Get on Board” Translink aims to make services accessible to all. Through working with stakeholders Translink strives to reduce barriers for people with disabilities and to assist them to travel with confidence. Over the last few years there have been a range of accessibility enhancements including the following: new vehicles; station improvements; upgrades to halts; enhanced passenger information and ticketing arrangements and employee training. These enhancements are targeted at ensuring that people with disabilities can participate more fully in society, reducing social isolation, boosting well-being and enabling better quality of life.

Extensive work has been undertaken with IMTAC on many elements of the Belfast Rapid Transport System including the design of vehicles, halts and ticketing to ensure accessibility was a priority. Translink has worked with IMTAC to commission specialised disability awareness training for the Belfast Rapid Transport System operational staff. The extensive work with disability groups on this initiative has been recognised by the Equality Commission.

In addition, consultation with IMTAC and other relevant groups (for example, user groups) has taken place as part of the New Fleet Projects to improve the accessibility of buses and trains.  This consultation has helped make improvements in terms of audio-visual messages on buses and the colour of destination screens.  This collaborative approach will be ongoing during these projects ensuring both environmental improvements and equality matters are considered throughout.

There has also been a high level of engagement with groups representing people with learning disabilities in the design of facilities in stations and in the roll out of their JAM “Just a Minute” card across the network. The card is designed for communication barriers such as learning difficulties, autism, Asperger’s syndrome or brain injury. The Chief Executive has also met with MENCAP to explore new community support initiatives for people with learning disabilities to help improve their self-confidence and to participate fully in society.

Through the external consultation on the audit of inequalities a view was expressed that Translink applies the Section 75 duties more significantly in relation to employment matters when compared with their core functions. Through consultation with the members of the EWG it was established that rigorous screening and extensive engagement and consultation is applied to external policy review and development of infrastructure projects.

While positive feedback was provided on the GLIDER in terms of accessibility and the training of the staff, a commitment has been given to roll out training with a specific focus on customer service for those with a disability and older people for staff in smaller stations and on some buses. It was however noted that positive feedback had been received on how the staff in the larger stations had supported people with disabilities.

Comment was also received through consultation on: the inaccessibility of some coaches for people with disabilities; on physical access to some stations; ambiguity around priority seating and need for a campaign to raise public awareness of the rights of wheel chair users and concerns over the impact of a cashless ticketing system on those who are socially disadvantaged.

In terms of the comments received in relation to the issues faced by people with disabilities Translink is aware of a number of these and is working on them. The training for staff on GLIDER and in the larger stations on the needs of people with disabilities is to be rolled out across the whole organisation. It was acknowledged during the consultation that staff attitudes to people with disabilities is taken very seriously and that extensive investment is to be made in training and in monitoring the behaviours of those on the frontline.

In terms of the issues identified on access to coaches for people with disabilities and priority seating it was acknowledged that there problems in terms of access with some vehicles and that there had been difficulties in terms of procuring vehicles to the specification required. It was however added that most of the bus fleet are now low floor and have access for people with disabilities. Comment was also made on the extensive consultation with IMTAC and on the positive changes identified in terms of new vehicles and signage that have been implemented.

It is of note that there is a considerable amount of useful information captured on the operational impact of Translink policies through the customer survey and on ticketing. The information captured could be used by Equality Working Group and senior management to monitor the effectiveness of policies in addressing equalities where impacts have been identified through screening.

Internally difficulties have been identified in accurately capturing information on the numbers in the workforce with disabilities. It is not possible to make any firm assessment of the representation of people with disabilities in the workforce and it is acknowledged that there are gaps in the information the organisation does capture. It is estimated that around 5% of the workforce has a disability however this figure needs to be interpreted in relation to a workforce where the vast majority of employees are in operational roles.

The staff engagement survey is however used to assess staff opinions on the promotion of equality for people with disabilities. In the 2017-2018 staff engagement survey 66% of the respondents felt that Translink valued diversity, an increase of 2% on the previous year. Meanwhile 70% indicated that they felt the organisation promotes a positive attitude towards people with a disability.

A range of proactive measures have been identified in the draft Equality Diversity and Inclusion strategy to encourage people with disabilities to apply for positions with Translink, to monitor application of the recruitment process and to increase representation in the workforce and to provide placements for people with disabilities.

To promote positive attitudes towards people with a disability and extensive training is undertaken for all staff and specific training to meet the needs of people with different disabilities is delivered to bus drivers.

Mental health is an area where considerable investment has been made by the organisation. There are trained mental health first aiders in the organisation and further training is planned in in this area.

Mental health training has been provided for all managers in partnership with Action Mental Health, Inspire and Employers for Disability NI.

An initiative to raise awareness on mental health was also held with partner organisations in Lanyon Place Station.

Actions

To continue to implement targeted training on the needs for people with disability and to monitor the positive behaviours displayed by front line staff and feedback captured from customers with a disability and to act on the findings.

To engage with disability groups through IMTAC to ensure that information on public transport for people with disabilities is easily assessable.

Ongoing delivery of projects/initiatives to support people with disabilities in accessing public transport.

To continue to implement DfI policies on concessionary fares for people with disabilities.

To review with relevant groups the impact of the Accessible Transport Strategy on people with disabilities using public transport.

Enhance the role of the Equality Working Group and senior management in monitoring the impact of people with disabilities being able to participate more actively in society through access to employment and public transport. To be assessed through qualitative feedback from IMTAC, user groups and information collated through community plans.

To continue to monitor input from disability groups on the implementation of the Belfast Rapid Transport System and the positive outcomes for people with disabilities.

To implement the actions in relation to people with disabilities in the Equality, Diversity Inclusion Strategy as listed below:

* Review strategy on attraction to identify opportunities to improve volume of applicants with disabilities
* Review recruitment and selection procedures to ensure they are supportive of an open and inclusive approach
* Establish the available employment and workplace schemes to support employment of people with disabilities

To continue to implement and monitor the impact of mental health training initiatives within the organisation.

To raise awareness of the measures that have been implemented to promote equality of opportunity for people with disabilities and of the areas where there are constraints on what is feasible in terms of certain vehicles. In addition to continuing to research ways to enhance access to public transport on some vehicles where limited enhancements have been introduced for people with disabilities.

Age

Translink has been proactive in engaging with younger people and older people in identifying enhancements to public transport both in terms of infrastructure and Fleet projects and improvements to services. Positive developments have been implemented in signage, use of technology and with schools on anti-social behaviour and other outreach initiatives.

Results from the Travel Survey for Northern Ireland (2016-2018) suggest that those in the 16-29 age category are more likely to use bus at least once a year as compared with those between 30-59 and there is also an increase in the numbers using buses at least once a year in the 60-69 age group.

It is also noted in the travel survey for Northern Ireland 2016-18 that 6% of those in the age range 16-29 had difficulties with travel compared to 42% of those aged 70 or over. Meanwhile 74% of respondents in the 16 age and over age group said they were satisfied with public transport services.

In the NISRA continuous household survey 2018/19 half of those aged 16-24 were aware of the journey planner mobile app. compared to 11% of those aged 65 or over. In addition to the fact that those aged over 65 were less likely to use the journey planner and are more likely to use hardcopy timetables or the Translink call centre.

In the Equality Commission Age Equality Policy Provision Recommendations (2017) it is recommended that when introducing systems that make use of IT and or the internet it is important to take account of the lower rates of IT awareness and or internet usage by older people or people with sensory disabilities compared to the rest of the population. Moreover, it is recommended that safeguards should be put in place to ensure that the use of these technologies does not lead to social isolation and this could include regular face to face meetings to review health needs.

Consideration was given in the screening of the policy on new ticketing arrangements for older people and younger people and it was concluded that there would be a positive impact due to the arrangements in place and the fact that concessionary Smartpasses did not need to be replaced. It will be important to continue to monitor and ensure that the policy continues to have a positive impact on older and younger people.

Promotional events have also been launched to encourage more older people to use Translink bus and rail services and data on the success of these campaigns is captured. Once again, this data would be useful for monitoring purposes.

Through the consultation on the audit of inequalities it was stated that more work needed to be done with older people to promote the services and to change perceptions of what is in place to make public transport more accessible to them.

In the Translink Annual Communication plan a commitment is given to close engagement and consultation with key groups such as older people and younger people.

Translink has given a commitment to work in partnership to help promote Age-friendly cities in NI through continued involvement as a key partner in Age friendly status in Belfast, Newry, Derry/Londonderry and similar involvement with other interested councils.

The customer survey collates information on age and gender, but it was not clear from the consultation undertaken if this information is analysed for the purpose of assessing the impact of policy in terms of the promotion of equality of opportunity. As previously stated It was noted in the Department for Infrastructure Survey that there was a differential in the uptake of concessionary fares in the West as opposed to the East and it would be useful to establish if there are differentials geographically in terms of concessionary fares by older people.

Promotional campaigns are run to encourage children and their grandparents to make more use to public transport to address social isolation.

Targeted consultation is undertaken by Translink on issues relevant to older people through the Seniors Parliament, Consumer Council and engagement with IMTAC. From the consultation with staff anecdotal evidence was provided that the more positive feedback on the drivers comes from older people.

In terms of younger people dedicated research is undertaken with young people though the Youth Forum in Belfast, Newry and Derry/Londonderry 8-10 times per year.

Translink engages in a wide range of initiatives with young people and some examples are as follows: a business mentoring project for young people (16-21) who have come through the care system; buy-social clauses in procurement to support young people who are out of work; Free Ylink fortnight to increase Ycard use; attending fresher events to promote metro smartcard; 40 schools involved in the Ecotravel Challenge; Schools art competition and safe travel /anti-social behaviour training in schools

Internally in 2018/19 there was a slight increase in the representation of younger people in the workforce.

An apprenticeship scheme is in place in the organisation and it take in 8-15 apprentices across all bus and rail services. The recruitment team also participate in career’s fairs and as already noted were proactively involved in supporting local young unemployed people in the Sandy Row and Grosvenor Road areas with training and support on careers with Translink.

Actions

To support DfI concessionary fares for people with disabilities, young people and older people and to monitor the uptake.

To continue to implement on an ongoing basis promotional events to encourage older people to use public transport and to monitor if there is an uptake in usage of public transport.

To continue to assist and work in collaboration with local councils in the promotion of Age Friendly Cities in Belfast, Newry, Derry/Londonderry and similar involvement with other interested councils.

To continue to undertake dedicated research with young people though the Youth Forum in Belfast, Newry and Derry/Londonderry 8-10 times per year.

To explore how to monitor the impact of the training for drivers on the service provided to older people/ younger people.

To integrate actions on consultation and engagement with younger and older people in the Annual Communications Plan.

To continue to implement the initiatives with schools, career and community events and to monitor the impact of the affirmative action measures.

Consideration of relevant questions in engagement survey

Gender

The results of the NISRA 2016-2018 public transport survey demonstrates that in all age ranges apart from 16-29 years and 70+ women are the main users of both bus and rail services. It was also noted in the survey that more women in the 70+ age group had difficulty with travel (48%) than men aged 70+(36%). Potential issues in terms of gender were identified through screening in relation to the GLIDER Penalty Fare appeals process where it was noted that heavily pregnant women and frail elderly people may not be able to queue for long periods of time and mitigation actions were identified.

In the previous Translink audit of inequalities it was noted that information would be collated through the annual customer survey on gender and dependents. As women tend to be the main carers, information on dependents may also be of relevance in terms of gender. Through the consultation it was established that an analysis of this information collated through the customer survey is not considered by the Equality Working Group at present.

Translink recognises that women are under-represented in the workforce and that initiatives need to continue to address this inequality. In a Business in the Community Gender Equality Report it was noted that a significant number of female staff are concentrated in administrative and secretarial roles and a minority in technical and skilled roles. Notwithstanding these statistics it was noted through consultation with internal staff that in the Belfast Hub Project Group women represent 50% of the workforce and this is in an area where job roles would be traditionally occupied by males.

Female leavers appeared to focus on perceived inflexibility in working patterns for single mothers and lack of career prospects as reasons for leaving. Gender Action Plans are being reconsidered to address inequality with the launch of the draft Equality Diversity Inclusion Strategy. There is a clear aim in the Action Plan to increase the number of females in the workforce.

Initiatives targeted at enhancing the representation in the workforce include: Have a Go Day to encourage women to take up roles as bus drivers; careers events; contribution to Women in Business Events; Promotional videos on women bus drivers; contribution to International Women’s Day and implementation of term time working. A commitment is given in the Draft Equality Diversity and Inclusion Strategy to continue with and enhance these activities.

In the employee engagement survey 2018 (71%) of those surveyed indicated that they felt that Translink promoted a positive attitude towards gender equality.

Through consultation with staff it was noted that while a policy on transgender did not exist a range of measures had been implemented to meet the specific needs of transgender employees and that it was planned to implement a policy for transgender staff in the near future. A comprehensive range of measures to promote gender equality in the workforce are identified in the Equality Diversity Inclusion action plan.

ACTIONS

To include consideration of the information on gender and dependents collated through the customer survey and feedback from customers on the agenda for the Equality Working Group Meeting.

To monitor the impact of the policy on ticketing appeals and mitigating measures on older and pregnant women.

To implement the actions in the Equality Diversity Action Plan in relation to gender and to monitor the outcomes against the targets set.

* To address gender equality by increasing female representation throughout Translink with a focus on recruitment into ‘non-traditional’ sectors through analysis of annual Article 55 review.
* To concentrate on measures to encourage more women to apply for positions in the organisation.

To review people related policies to ensure they are inclusive of LGBT needs

Dependents

The results of the travel survey 2016-2018 survey demonstrate that in terms of mode of transport and age a lesser percentage of people in the 16-64 age group use public transport. It appears that in the main the population with dependents is less reliant on public transport.

Accessibility to buses, trains and stations can be an issue for those with buggies and or frail older people with mobility needs. As was noted in the earlier sections of the report extensive consultation is undertaken with users through the user groups and community groups on a geographical basis and through IMTAC. Extensive consultation is also undertaken where capital projects are at an early design stage and changes have been specifically implemented to facilitate people with dependants.

In the previous audit of inequalities it was noted that information would be collated through the annual customer survey on gender and dependents and it would therefore be possible to assess the uptake of those with dependents through the customer survey.

Initiatives have been targeted to encourage those with caring responsibilities to use public transport through the partnership with W5 and Surestart and the promotion campaign to encourage children and their grandparents to travel on public transport.

Within the workforce a proactive approach has been taken to implementing flexible working practices for those with caring responsibilities.

ACTIONS

To include consideration of the information collated through the customer survey on those with dependents at the Equality Working Group Meeting.

To continue to target promotional events on use of public transport at those with caring responsibilities and to monitor the outcomes.

To continue to review the employee policies on flexible working and to monitor the impact.

Marital Status

The analysis of the quantitative and qualitative data has indicated that there are no equality issues in relation to marital status and use of public transport.

In terms of the workforce a proactive programme of screening has been undertaken on new and revised HR policy and no issues have been identified in terms of marital status.

ACTIONS

Non-applicable

Good Relations

Public transport provides vital services for all sections of the community. Through the implementation of the CSR strategy the organisation has enhanced engagement in outreach activities with local community groups and with young people from all sections of the community. Community consultation on the Belfast Hub included engagement with school children from the two main communities and a range of ethnic minority communities. There is also very proactive engagement with schools representing both communities through outreach activities. A positive contribution has been made to supporting cultural events and to partnering with groups addressing issues for refugees. Internally there is a commitment in the values of the organisation to promote a diverse workforce where respect is enshrined and reinforced through the values. Training has been dedicated to dignity at work, robust monitoring is undertaken in terms of the representation of section 75 groups in the workforce and affirmative action measures implemented.

ACTIONS

To continue to implement the community engagement activities in the corporate social responsibility strategy.

To engage with the local councils in the implementation of their community plans and to consider local issues in terms of transport that promote social inclusion and a shared society.

ACTIONS

To continue to implement training and other initiatives in the Draft EDI strategy to promote a culture of dignity and respect in the workforce and to monitor effectiveness of training.

SECTION 5

Conclusions

The audit of inequalities demonstrates that in terms of leadership and good governance many positive initiatives have been implemented since the last audit. Senior leadership has championed equality and acted as ambassadors for a range of the Section 75 groups. A positive governance role has been adopted in scrutinizing compliance with Section 75 by the Equality Working Group. The involvement of senior management from across the organisation has provided an important mechanism for mainstreaming Section 75.

Notwithstanding the positive work of the Equality Working Group it is recommended in this report that the remit of the group is enhanced to take a more proactive role in monitoring the extensive customer data captured by the organisation from a Section 75 perspective. In the last audit a commitment was given to use the customer survey and communication plan to capture information on and to target a range of the Section 75 groups such as older people, people with disabilities and younger people.

Through the consultation for the audit it has been acknowledged that while the public transport system in Belfast and on the cross-border rail services have greatly enhanced services for those with a disability, improvements still need to be made. A focus on training for drivers is being rolled-out and research is ongoing on possible changes to coaches.

Procurement and Section 75 is an area that is specifically mentioned by the Equality Commission in the guidelines for conducting an audit of inequalities. Through the consultation it was established that a robust, good practice approach has been adopted in relation to procurement. A clause regarding Section 75 of the Northern Ireland Act 1998 has been added to the Project Management Procedure. Translink were also successful in winning two categories in the GO Buy Social/Sustainable Procurement awards. Section 75 has also been mainstreamed into development projects such as the Hub where all private sector companies involved in the project had to demonstrate how section 75 was integrated into their designs.

Through the audit it was established that there would be merit in having a representative from procurement on the Equality Working Group to provide an overview of how procurement could continue to make a positive contribution in terms of Section 75 on an ongoing basis.

Extensive engagement is undertaken by the Project and Infrastructure at an early stage in the design of new infrastructure projects. Evidence was provided through the audit of adaptations to design being put in place to accommodate those with caring responsibilities, with disabilities and older people. Moreover, it was noted that representatives from the Project and Infrastructure team did report to and work closely with the Equality Working Group in considering the impact of new infrastructure projects on section 75 groups.

While positive changes have been made in promoting section 75 in the workforce there is an acknowledgement that more can be done. A more targeted approach to promoting equality is to be taken going forward through the Draft Equality Diversity and Inclusion strategy in terms of gender, LGBT community and those with a disability.

Over the last five years the level of engagement with local communities has been enhanced and proactive measures taken to build positive relations with community groups, young people, older people, with disabilities, the unemployed and the LGBT community. Going forward it will be important that the levels of engagement continue. Through partnership working with local government, health and education at local level consideration be given to public transport needs for groups such as migrant workers, older people and those who live in rural communities.

SECTION SIX

ACTION PLAN 2021-2026

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| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
| The updated Audit of Inequalities and action plan | 1. Consultation on the audit | Level of input to consultation exercise  Response to consultees | 12 week consultation to being in December 2020 and complete in March 2021 | Compare comments against the research undertaken for audit and identify gaps/issues that have not arisen to date that may need to be taken on board. |
| Notify ECNI of 5 year review | 2. Issue Equality Scheme to ECNI | Equality Scheme review | May 2021 |  |
| Communication with workforce | 3. Communication of audit findings and actions to workforce | Workforce briefing completed 2 weeks following publication | 2 weeks after publication | Monitor level of awareness of workforce on implementation of section 75 |
| Religion / Political Opinion | 4. To continue to support DfI in the implementation of concessionary rates across the community in NI | Ongoing provision of data as required | Ongoing | Analysis against the updated census information  Statistics produced by DfI  In the Travel Survey |
| 5. Liaise with local councils on their community plans in line with their timetables and consultation process to encourage participation in the use of public transport. | Contribution to action measures in council community plans in relation to public transport | Ongoing | Information in the new census  Local consultation information captured as part of community planning process |
| 6. To review fair participation of the two main communities in the workforce when the new census data is available. | Evidence of fair participation | Census expected 2021 | New Census information and Article 55 reviews |

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| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
| Sexual Orientation | 7. To confirm if DfI captures information on travel needs and issues in the Transport survey and if so consider any information arising. | Available information | Review data when produced annually | The transport survey |
| 8. To implement the actions in relation to sexual orientation in the Draft EDI strategy:  Obtain membership of Stonewall  9. To take part in Belfast Pride August annually  10. Create an LGBT network within the organisation  11. LGBT network feed into the Diversity Agenda 2021 ongoing | Achievement of targets in the Draft EDI strategy in relation to sexual orientation | February 2020    August each year  2021 Ongoing | Using Stonewall to benchmark with good practice  Benchmarking good practice with Stonewall involvement with PRIDE |
| 12. Consideration of relevant questions in engagement survey | Use engagement data to generate benchmark data | 2021 and ongoing | Adding questions in the engagement survey |
| Race | 13. To explore sources of data available on ethnic minority workers and migrant workers and the use of public transport. | Increase in data on the experience and needs of people from ethnic minority communities. | Ongoing | The updated census information  The research and consultation undertaken as part of the community planning by the district councils Target representation of people from ethnic minority communities on user groups |
| 14. To analyse the census data and representation of people from ethnic minority communities in the workforce. | To consider targeted actions in the draft EDI strategy | Census expected in 2021 | Census 2021 |
| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
| Disability | 15. To continue to implement training on the needs for people with disability and to monitor positive behaviours | Increases in positive feedback on drivers | Ongoing | Mechanisms to monitor positive behaviours of employees |
| 16. Assess and engage the sector to develop appropriate awareness interventions for our Network Schedulers. | Creation of awareness interventions | Autumn 2022 | Consultation with relevant parties |
| 17. Review and update were appropriate the Access Policy | Up-to-date policy published | 2022 | Review of Station Accessibility Audit  Consultation with relevant bodies |
| 18. Co-ordinate operational changes to remove the requirement for those with accessibility needs providing 24-hour notice. | Operational changes made removing the 24-hour notice period required | July 2021 | Review of Access Policy |
| 19. Engage with disability groups through IMTAC to ensure information is accessible for people with disabilities | Positive feedback from IMTAC | Ongoing | Meetings with IMTAC |
| 20. Evaluate the performance and monitor the impact of the newly ordered 6 Pilot Low Floor coaches to inform the New Fleet Framework.  The Framework will subsequently be developed to optimize the procurement of Low Floor coaches taking account of passenger requirements | Procurement of more low floor coaches | Review pilot project by 2022  New fleet framework by 2023 | Data collated for Annual Review  Pilot Project review  Supplier modernisation |
| 21. update the Station and Facilities Accessibility Audit. | Updated Audit completed | Autumn 2021 | Station and Facilities review |

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| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
|  | 22. To continue to deliver property projects to support people with disabilities in accessing public transport | Enhancement of facilities | Ongoing | Completed Equality Screening Reports  Data collated for Annual Review |
| 23. To continue to facilitate DfI policy on fares for people with disabilities | Positive outcomes for people with disabilities | Ongoing |  |
| 24 Annual feedback from survey findings to be reviewed by the Equality Working Group, to identify learning to feed into screening and continuous improvement of services. | Positive monitoring on continuous improvement of services | Annually | EWG  Monitoring of Screening reports  DAP outcomes  Feedback from IMTAC  Data captured through community plans. |
| To implement the actions in the draft EDI:   * 25. To review recruitment strategy to identify opportunities to increase applicants with a disability * 26. Establish employment and workplace schemes to support employment of people with disabilities | Established outreach measures in place to increase in numbers of applicants with a disability  Scheme established  Year on year increase in number of participants | June 2022 and annually thereafter  December 2021  Annual review from 2022 onwards | Monitoring of recruitment and workforce trends  Disability organisations  Equality Commission Research  DAP |

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| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
|  | 27. Deliver the Digital project entitled “Transforming Travel and Social Inclusion Project” | Obtain level AA of the Web Content Accessibility Guidelines (WCAG 2.1)  Improve access to timetables for assistive technology users  Expand the channels / services that Translink's digital estate can support - voice (e.g. Alexa), text and voice enabled AI chatbots  Accessible online journey planning (inc. info re. lifts, escalators, steps / step free journeys)  Provide additional in-journey customer support for all travellers, and prioritised support for those with increased accessibility needs. | October 2021  Iterative development July 2021  Iterative development from Sep 2021  iterative development from Oct 2021  March 2024 | Project Review  Consultation with IMTAC and other relevant organisations/groups  Customer Feedback  Annual Website Audit |
| 28. To continue to implement and monitor the impact of the mental health and wellbeing initiatives | 60 Health and Wellbeing Initiatives per year  25% Participation in well-being initiatives / events  25 Trained Mental Health First Aiders  30 ‘Go Healthy’ Champions | Ongoing | Workforce statistics  Review of Initiatives and participation |

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| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
| Disability | 29. To review with relevant groups the impact of the Accessible Transport Strategy on people with disabilities using public transport. | Evidence of positive feedback  Decrease in customer complaints | Ongoing | IMTAC  Equality Commission research |
| 30. To continue to monitor the input from disability groups on the implementation of the Belfast Rapid Transport System and positive outcomes for people with disabilities. | Evidence of positive feedback from people with disabilities on their experiences on public transport | Ongoing | Disability organisations  Equality Commission Research  The DFI Travel Survey |
| 31. To raise awareness of measures implemented to promote equal access for people with disabilities | Greater awareness of the measures that have been implemented in terms of promoting equality of opportunity. | Ongoing | Disability organisations  Equality Commission Research |
| Age | 32. To continue to facilitate DfI concessionary fares policy for young people and older people. | To continue to fund concessionary fares for young people and older people and to assist DfI monitor the uptake. | Ongoing | The customer survey  The updated census information |
| 33. Explore possibility of monitoring of annual data on usage of public transport and age. | Benchmark information available | 2021 | The customer survey  Customer Feedback |
| 34. To continue to implement promotional events to encourage older people to use public transport | Increase in use of public transport by older people | Ongoing | Transport Survey |
| 35. To continue to assist and work in collaboration with local councils in the promotion of Age Friendly Cities. | Positive initiatives implemented on a regional basis | Ongoing | Monitoring information on passengers  Outcomes in relation to transport in Age Friendly strategies |
| 36. To continue to undertake research with young people regionally and through the Youth Forum | Positive suggestions generated and implemented | Ongoing |  |
| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
| Age | 37. Explore the possibility of monitoring the impact of training for drivers and feedback from age groups | Available feedback from older and younger people  Performance Indicator | 2021 | Customer survey  Consultation and engagement events  Associated Research |
| 38. To integrate actions on consultation and engagement with younger people and older people into the Annual Communications Plan | Enhanced information on the needs and issues for younger and older people  Positive feedback from younger/older people | Annually | Equality Commission  Travel Survey |
| 39. To continue to implement the initiatives with schools, career and community events and to monitor the impact of the affirmative action measures. | Increased participation in younger people in the workforce | Ongoing | Workforce Monitoring |
| 40. Consideration of relevant questions in engagement survey | Increase in ratings in staff engagement survey | 2021 and ongoing | Engagement Survey |
| Gender | 41. To include consideration of the information collated through the customer survey on gender and dependents at the Equality Working Group Meeting. | Establish baseline information on usage figures for women and women with dependants. | Annually | The customer survey  The DFI Travel Survey |
| 42. To monitor the impact of the policy on ticketing appeals on older women and pregnant women | Evidence Policy is not having adverse differential impact on women | Annually | ECNI research |
| 43. To review people related policies to ensure they are inclusive of LGBT needs | Policy revisions made | In line with established policy review dates | Article 55 Reviews |

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| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
|  | 44. To Implement the EDI action plan in relation to gender and to monitor the outcomes against the targets set | Increase application rate of females by 15%  Increase appointment rate of females by 15%  Create Female Network  Conduct Focus Groups to identify a plan to support the increase in female representation and inclusion | 2024  2024  May 2021  June 2021 | Annual demographic review  Annual Section 75 Review  Diversity Mark Annual Review |
| Dependents | 45. To include consideration of the information collated through the customer survey at the Equality Working Group Meeting. | Baseline data generated and ongoing monitoring | Annually | The customer survey |
| 46. To continue to target promotional events on use of public transport for those with caring responsibilities | Increase in usage of public transport by those with dependents. | Ongoing | The customer survey |
| 47. To continue to review polices on flexible working and to monitor the impact | Increase in representation of women in the workforce. | In line with established policy review dates | Article 55 reviews  Exit interviews |
| Marital Status | None |  |  |  |
| Good Relations | 48. To continue to implement the community engagement activities in the corporate responsibility strategy. | Monitor and measure the impact of CR activity in promoting good relations | Ongoing, reviewed annually | The outcomes of community outreach activities in relation to the two main communities and building a shared future |
| 49. To engage with the local councils in the implementation of their community plans and to consider local issues in terms of transport that promote social inclusion and a shared society. | The positive outcomes achieved at a local level in terms of public transport and social inclusion. | Ongoing, in line with Local Council plans | Outcomes in terms of performance reporting from the district council community plans |
| **Area of Implementation** | **Action Measure** | **Performance Indicator/s** | **Timescale** | **Associated Research/ Monitoring** |
| Procurement | 50. Representation on the EWG from procurement | Evidence of promoting equality through procurement | January 2021 | ECNI Good Practice in procurement  Ongoing monitoring of impacts identified in Screening reports |
| All Section 75 Groups | 51. To continue to implement training and other initiatives in the Draft EDI strategy to promote a culture of dignity and respect in the workforce and to monitor effectiveness of training | Evidence through the engagement survey of evaluation of training and baseline to evidence improvements. | Ongoing, reviewed annually | The engagement survey  Audit of training effectiveness |