**Disability Action Plan**

**December 2022 - December 2026**

**Northern Ireland Transport Holding Company**

 

**Introduction**

**1.1** Under Section 49A of the Disability Discrimination Act 1995 (DDA 1995) (as amended by Article 5 of the Disability Discrimination (Northern Ireland) Order 2006), the Northern Ireland Transport Holding Company (NITHCo) is required when carrying out its functions to have due regard to the need to:

* promote positive attitudes towards disabled people; and
* encourage participation by disabled people in public life (‘the

disability duties’).

Under Section 49B of the DDA 1995, Northern Ireland Transport Holding Company (NITHCo) is also required to submit to the Equality Commission a Disability Action Plan showing how it proposes to fulfill these duties in relation to its functions.

**1.2** As Chairperson and Group Chief Executive of NITHCo, we are committed to implementing effectively the disability duties and this Disability Action Plan (DAP). We will allocate all necessary resources (in terms of people, time and money) in order to implement effectively this plan and where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.

We will also put appropriate internal arrangements in place to ensure that the disability duties are complied with and this Disability Action Plan is effectively implemented. We will ensure the effective communication of the plan to staff and to provide all necessary training and guidance for staff on the disability duties and the implementation of the plan.

We will ensure that appropriate methods are used for all consultation (in line with the guiding principles set out in the Equality Commission guidance on Section 75) and that a period of at least two months is allowed. NITHCo and Translink already have arrangements in place to meet with IMTAC (Inclusive Mobility and Transport Advisory Committee) on a regular basis to address the needs of disabled people in accessing and using public transport. These contacts will be fully utilised to ensure that the Disability Action Plan is developed and implemented effectively. Translink will also consult with other organisations representing the views of disabled persons, and where possible will address their needs. In addition, the needs of disabled people will be reviewed annually as part of the Annual Progress Report.

Responsibility for implementing, reviewing and evaluating this Disability Action Plan and the point of contact within the organisation will be:

 Cara Woods

 Equality, Diversity & Inclusion Advisor

 Floor 6, 22 Great Victoria Street

 Belfast

 BT2 7LX

 Email: cara.woods@Translink.co.uk

 Textphone: 028 9066 66 30 (This connects to the Translink Call Centre)

If you require this plan in an alternative format (such as in large print, in Braille, on audio cassette, easy read or on computer disc) and/or language, please contact the above person to discuss your requirements.

**1.3** We confirm our commitment to submitting an annual progress report on the implementation of this plan to the Equality Commission and carrying out a five year review of this plan, or plans submitted to the Equality Commission over the five year review period.

A copy of this plan, our annual progress to the Equality Commission and our five year review of this plan will be made available on our website at:

[NITHC Reports (translink.co.uk)](https://www.translink.co.uk/corporate/publicationsanddocuments/nithcreports)

**1.4** **Functions**

Outlined below are the range of functions of NITHCo.

NITHCo is a public corporation established under the Transport Act (NI) 1967 to oversee the provision of public transport in Northern Ireland. It is responsible for the operation of its subsidiary companies, Citybus (which operates Metro services), NI Railways and Ulsterbus, which operate together under the brand name Translink to deliver scheduled bus and rail services in Northern Ireland, including cross-border and cross-channel links. NITHCo is accountable to the Department for Infrastructure (DfI) which develops transport strategies for Northern Ireland and determines public transport policy.

1.4.1 The NITHCo Board is responsible for approving the strategies of its subsidiary companies and the annual Corporate Plan and for their proper governance. It meets on a regular basis to review the implementation of policy objectives and to monitor financial performance. NITHCo also owns a portfolio of property investments that generate funds for capital investment throughout the Group.

1.4.2 The responsibilities of the various bodies which together deliver public transport services in Northern Ireland can best be illustrated as follows:

**Minister**

**Department for Infrastructure**



TRANSPORT POLICY

**Northern Ireland Transport Holding Company**

STRATEGY & GOVERNANCE

**Translink Executive Group**

STRATEGY & OPERATIONS



**CITYBUS**

**ULSTERBUS**

**N I RAILWAYS**

1.4.3 The NITHCo Board comprises of a Chairperson, non-executive directors and three executives, namely the Group Chief Executive, the Chief Strategy Officer and Chief Financial Officer of Translink. The Chairpersonship and other non-executive directors are appointed by the Minister for Infrastructure. All the NITHCo Directors are also Directors of the subsidiary companies.

1.4.4 The operational management of the Translink subsidiaries is delegated by the Board to the Group Chief Executive and Senior Management who meet regularly as the Executive Committee.

The principal responsibilities of the NITHCo Board are:

* to agree overall strategy and investment policy
* to approve major capital expenditure
* to monitor the performance of senior management
* to ensure there are proper internal controls in place.

Further information on NITHCo can be found on the Translink website at [Corporate (translink.co.uk)](https://www.translink.co.uk/corporate)

**1.5** **Public Life Positions**

NITHCo has no responsibility for making public appointments as the members of the NITHCo Board are appointed by the Department for Infrastructure. However, we acknowledge that the disability duties relate not only to formal public appointments but also to the way in which disabled people contribute to or are involved in policy decision making or decisions relating to the way in which public authorities carry out their functions. NITHCo has a well-established network of user and consultation groups which contribute to the policy development process and which involve disabled people. Some examples of who we consultation with include:

* Accessibility Working Group
* Area User Groups
* Translink’s Youth Forum
* Employee Networks
* Internal Equality Working Group

***2.* Action Measures**

Outlined overleaf are the measures which we propose to take over the period of this disability action plan, together with performance indicators and targets.

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| Area | Measures | Timescale / Target Date | Actions  | Performance Indicators  | Responsibility  |
| 1. **Actions to Promote Positive Attitudes towards Disabled People**
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| Review of Internal and External Communication to promote positive messages | 1.1 Enhance the profile of the Disability Action plan | 2023, 1 month from plan approval2023, 2 months from plan approvalOngoingDecember 2023 | Development and implementation of an internal communications plan to increase engagement on the Disability Action PlanEquality Working Group (EWG) members champion the commitments in DAP and communicate relevant responsibilities to their TeamsInduction training delivered to all new staff (this includes information on the DAP). Attendance reviewed annuallyDevelop an online module, accessible on the e-learning portal for Managers in relation to disability duties and their responsibilities under the disability action plan | 100% of all New Starts receive induction E-Learning Module launched by December 202360% of Managers completed e-learning by March 2024 | HR / Internal Communications/ EWG |
| 1.2 Promotion of Accessibility developments on Social Media channels  | Reviewed annually Reviewed annually | Continue to develop marketing campaigns with diverse imagery, including images representing those with a disability.Identify within the communication plan opportunities to promote engagement with disability groups and/or schemes e.g. JAM card, visits from disability organisations  | 3 Promotional Initiatives each year e.g. promotion of Changing Places Facilities, respect for priority seats / spaces  | Accessibility Manager  |
| Promoting positive attitudes amongst Employees | 1.3 Deliver internal communications to celebrate the contribution of Disabled People | August 2023December 2024December 2025December 2026 | Develop a communication plan to share experience of those with a disability e.g. a profile of those placed in the work placement schemeIdentify ways to celebrate and acknowledge Disabled Staff contributions e.g. celebration of International Day of People with Disabilities on 3rd December.2 ‘staff stories’ to be created and shared on internal communication channels celebrating the contribution of those with a disability. Continue to develop at least 2 ‘staff stories’ and celebrate International Day of People with Disabilities  | Celebration of International Day of People with Disabilities annually from December 20242 Staff stories to raise awareness and celebrate those with a disability by December 2026 | HR/ Accessibility Manager  |

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| 1. **Actions to Encourage Disabled People’s Participation in Public Life**
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| Area | Measures | Timescale / Target Date | Actions  | Performance Indicators  | Responsibility  |
| Recruitment, Selection and Participation of Disabled People | 2.1 Review recruitment strategy to identify opportunities to increase applicants with a disability | June 2023 and annually thereafterOngoing | Establish outreach measures to increase number of applicants with a disabilityContinue to promote vacancies with relevant disability groups i.e. Employers Forum Disability NI and Northern Ireland Union of Supported Employment | 1 new outreach initiative for those with a Disability per year | HR |
| 2.2 Continue to deliver the guaranteed interview scheme | Ongoing | Increased presence on the ‘careerswithtranslink’ website to highlight this scheme to encourage applicationsOngoing briefing of Recruitment Team staff and Hiring Managers in the application of this scheme. | 100% of Inductions completed for Recruitment staff  | HR |
| Create opportunities for involving disabled people in public life | 2.3 Engage with disability groups through IMTAC to ensure information is accessible for people with disabilities |  Quarterly | Meetings with IMTACPositive feedback from IMTAC | 4 meetings with IMTAC per year, attended by Translink representatives with agreed actions points made | Accessibility Manager  |
| 2.4 To continue to deliver property projects to support people with disabilities in accessing public transport | Ongoing | Enhancements of facilities. Changing Places facilities designed into all new stations and considered in major station refurbishments | Changing places in 100% of all new stations  | Infrastructure and Projects  |
| 2.5 Deliver the Digital project entitled “Transforming Travel and Social Inclusion Project” | April 2023   March 2024  March 2023 March 2024 | Improve access to timetables for assistive technology users e.g. Beta version and Chatbot Expand the channels / services that Translink's digital estate can support to improve access to information with new interfaces  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 | Assistive Technology introduced by April 2023Channels extended in digital by March 2024Accessibility information introduced into online journey planning by March 2023In-journey customer support introduced by March 2024 | Commercial Operations  |
| 2.6 Achieve and Maintain WCAG 2.1 Website Compatibility  | Ongoing | Engage with the 3rd Party Auditor to ensure Translink’s website fully meets the standards to retain full accreditation to WCAG 2.1 standard. | Full WCAG 2.1 accreditation maintained Implementation of self-auditing tools and software for WCAG compliance  | Commercial Operations  |
| Effective Consultation | 2.7 Consultation on the draft Disability Action Plan | November 2022 –January 2023February 2023March 2023 | Issue Draft DAP to consultees for 12 weeks and actively seek feedback Review draft DAP in light of consultee feedbackSubmission to the Equality Commission for NI and finalisation of DAP | Responses received on consultation exercise and responses provided to eachSubmission of final DAP to Equality Commission  | HR  |

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| 1. **Actions to promote both duties**
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| Area | Measures | Timescale / Target Date | Actions  | Performance Indicators  | Responsibility  |
| Training and Awareness Raising | 3.1 Review Current Recruitment and Selection Training to increase disability awareness and promote positive attitudes to disabled applicants | June 2023September 2023 | Review of current selection training package Implementation of changes to the programme | New Recruitment and Selection module released by September 2023  | HR  |
| 3.2 Assess and engage the sector to develop appropriate awareness interventions for our Network Schedulers. | August 2023 | Creation of awareness interventions in line with service developments in relation to accessibility  | 80% of Network Schedulers completed awareness raising activity  | Accessibility Manager  |
| 3.3 Continue to implement and monitor the impact of mental health and wellbeing initiatives | Annually  | Implement a range of Health and Wellbeing Initiatives | 60 Health and Wellbeing Initiatives per year25% Participation in well-being initiatives / events25 Trained Mental Health First Aiders 30 ‘Go Healthy’ Champions | HR  |
| 3.4 Continued delivery of Customer Care training for Bus and Rail customer service staff  | Attendance monitored annuallyApril 2023October 2023December 2024 | Ongoing delivery of World Host Inclusive Services training for all new Bus Drivers (includes training on disability and accessibility)Develop, as part of the next annual Bus Driver CPC training, a section on Inclusive Customer Service with a focus on disability and accessibility Deliver World Host Inclusive Services training for new and existing Rail Customer Service Staff, this includes training on disability and accessibility. Develop and implement annual customer service training for all customer facing staff that will include disability awareness | 100% of new Bus Drivers complete World Host trainingBus Drivers complete annual CPC training in line with Bus Driver PSV legislationWorld Host training delivered as part of Rail Customer Services induction by October 202380% of customer facing staff complete Customer Service training by December 2024  | Training  |
| 3.5 Accessibility awareness for Infrastructure and Projects | 2025December 2023 | Develop an awareness programme to increase understanding amongst key Project / Programme Managers on the lived experiences of disabled people and how this interfaces with Infrastructure Projects. Ensure ongoing management of Disability needs throughout Project Implementation period  | Awareness programme developed by 2025 New project governance documents introduced | Accessibility Manager / Infrastructure and Projects |
| 3.6 Introduce an awareness session for Translink’s Senior Executive Team to understand the lived experience of those with a disability | December 2023 | Co-ordination with IMTAC to develop and introduce an appropriate experiential training and awareness session  | 70% of Senior Executive Team to attend experiential training  | Accessibility Manager |
| Internal Structures to ensure Compliance with duties | 3.7 Review of Equality Working Group (EWG) Membership | August Annually | Appointment of representatives to the EWG, where appropriate, to ensure key areas of the organisation continue to be represented.  | Annual Review completed  | EWG |
| 3.8 Disability Action Plan review as part of Annual Section 75 reporting process.  | August Annually | Annual review presented and agreed with the EWG and presented to the Executive Team | Submission of annual section 75 review | HR |
| 3.9 Annual feedback from customer survey findings to be reviewed by the Equality Working Group | Annually | Identification of learning to feed into screening and continuous improvement of services for those with a disability. | Presentation delivered annually  | Commercial Operations / EWG |
| Monitor and Review of Actions | 3.10 Evaluate performance and monitor the impact of the newly ordered 6 Pilot Low Floor coaches to inform the New Fleet Framework.   | March 2024Ongoing | Review of pilot project with recommendations leading to the procurement of more low floor coachesEngagement with Coach Manufacturers to promote customer needs and encourage accessibility improvements | Completion of a ‘Pilot Project Review’ by March 2024Creation of a New Fleet Framework that optimizes the procurement of Low Floor coaches taking account of passenger requirements by 2025 | Engineering  |
| 3.11 Update the Station and Facilities Accessibility Audit. | March 2025 | Updated Audit completed for customers to plan their journey. Feasibility Study (i.e. audit) completed with actions developed and prioritised  | Audit completed with all actions prioritised by 2024 | Infrastructure and Projects  |
| 3.12 Review of disability related complaints | January 2023AnnuallyOngoing | Introduction of a mechanism to record complaints categorised by disability and review of implementationAnnual review of complaints and identification of improvements where required e.g. training needs or changes to policy/process.Continued to offer one-to-one meetings with each stage 2 complainant to ensure an appropriate resolution is put in place | Completion of Annual review of complaints 100% of all stage 2 complainants offered a one-to-one meeting | Accessibility Manager / Commercial Operations |
| 3.13 Review of available data to understand employee demographics and experiences | Annually | Continued analysis of applicant and employee data related to disability to identify any adverse impact and improvementsContinued analysis of Exit Questionnaire data to identify patterns and any learning to implement | Completion of annual Article 55 reviews |  |
| 3.14 Engagement with relevant User Groups to understand the needs of those with a disability and encourage engagement with Translink’s services | Quarterly | The Accessibility Manager will continue to actively work with disability organisations by facilitating quarterly working sessions with:* IMTAC
* Translink Accessibility Working Group

To identify key operational developments/changes needed | 4 meetings arranged per year with agreed actions | Accessibility Manager  |
| 3.15 Review actions in light of the Department of Health’s Autism Strategy 2023-2028 | 2023, post publication | Review the Autism Strategy and revise relevant actions / plans to consider alignment with anticipated areas of:Training and awarenessPolicy developmentInternal/external communication | Review completed with actions identified | HR |
| Procurement | 3.16 Continue to include ‘eligibility’ questions for all procurement activity relating to equality legislation, including disability duties | Ongoing | Continued application of Equality of Opportunity and Anti-Discrimination questions at the selection stage of procurement exercises  | Application of EO and anti-discrimination question in all relevant procurement exercises.Application of Social Value scoring on all relevant tenders | Procurement  |
| 3.17 Application of Social Value Award Criteria in relevant procurement | Ongoing | Application of [PPN 01/21](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fwww.finance-ni.gov.uk%2Fpublications%2Fppn-0121-scoring-social-value&data=05%7C01%7CCara.Woods%40Translink.co.uk%7C80c9fa372eb549918ea708dac32eb3c6%7Cd8a49730608f463fbf3b3befdd4b347f%7C0%7C0%7C638036902606344103%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=3P2J4iPUCzsiA5%2F%2BShFZ4dVt9COlZRC%2BRguDeTNJp4g%3D&reserved=0) ‘Scoring Social Value’ allocating a minimum of 10% of the total award criteria to social value on services or works contracts where the total value exceeds the relevant threshold for regulated procurements.Where appropriate include specific indicators that encourage inclusion:1.5 Increase the representation of disabled people in the contract workforce1.6 Support disabled people to develop new skills and recognised qualifications4.3 Promote equality, diversity and inclusion in the contract's workforce |
| 3.18 Accessibility Investigation included at premarket stage | Ongoing | Assess the types of information needed, at tender design stage to ensure that technology products and services brought into Translink will work for people with disabilities. |
| 3.19 Supplier Engagement | Ongoing | Promote Translink’s objective to promote opportunities for people with disabilities as a result of the procurement during supplier engagement sessions. |
| Employment Measures  | 3.20 Establish a work placement scheme to support employment of people with disabilities | December 2022Annual review from 2023 onwardsAugust 2023 | Scheme EstablishedYear on year increase in the number of participantsDevelop Internal and External Communication campaign around the Disability Workplace Scheme promoting the contribution of those placed and their individual stories  | 2 Placements made in 2023Annual review completed by September 2023 with identification of how to increase number of participants. | HR / Equality Working Group |
| Measures to encourage other organisations to promote both duties | 3.21 Engagement with other organisations to share learning and improve the lives of those with a disability  | Quarterly  | Engage in quarterly meetings with:* Councils e.g. ‘Age-Friendly Cities’ across NI
* Disability Organisations and/or
* Disability Charities

With the aim of identifying the needs of those with a disability, sharing learning and encouraging a collective approach to improving the lives of those with a disability. | 4 Meetings attended per year  | Accessibility Manager |

Signed by:

 

Dr Michael Wardlow Mr Chris Conway

Chairperson Chief Executive Officer