



## **Consumer Council response to the Translink Strategy – Better Connected**

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland. The Consumer Council has specific statutory duties in relation to energy, postal services, transport, and water and sewerage. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers.

### **1. Do you agree, delivery of the new Translink vision, mission and wider strategy as set out will enhance the economic, social and environmental well-being of our society?**

We agree that this strategy if delivered will enhance the economic, social and environmental well-being of our society.

The document makes clear that the strategy aligns with Government policies. The vision “Your first choice for travel, today, for tomorrow” needs to be understood within the context of the travel hierarchy laid out in the Department for Infrastructure’s (DfI), document “Planning for the future of Transport - Time for Change” document. The hierarchy requires the prioritising of sustainable transport by:

- firstly providing for walking and wheeling,
- then providing for cycling,
- then providing for public transport,
- then providing for taxis and shared transport and goods vehicles, and

- finally, providing for private cars and motorcycles.

Within the mission statement we particularly welcome the focus on creating integrated networks. Northern Ireland has in the past lacked integration of its transport services and while achieving this is primarily the role of Government, Translink, as the main provider of public transport services has a key role to play. Consumers stand to benefit from the integration of a wide range of transport services.

The four strategic objectives adequately encompass the priorities that consumers have for Translink. The objectives contained in the strategy are high level and the Consumer Council will continue to work closely with Translink as more detailed actions and targets are developed.

## **2. Do you agree the values as set out in our SPIRIT agenda will adequately underpin our ability to deliver this new strategy?**

The core values repeat those used in the previous Translink strategy. We agree that they are a good yardstick to measure the culture and behaviour of staff. From the perspective of an organisation that represents public transport consumers we value the inclusion of 'Teamwork' and the encouragement of collaboration to build and nurture valuable relationships. We work with Translink on a number of issues, in particular complaints handling, accessibility to services, operational issues and staff training. We recognise the effort that Translink has made during the period of the previous strategy to achieve success relating to customer satisfaction, increased passenger numbers, and staff development. We look forward to continuing to work with Translink.

## **3. *Strategic Objective: Continuous Improvement***

### **Do you agree with the ethos and direction of travel set out under this objective?**

We support this objective. It is important that Translink focuses on improving all aspects of its services both to benefit existing customers and to attract new ones. This is particularly

important as Translink seeks to attract passengers back to public transport following the Covid-19 pandemic. It will also be important in attempting to encourage consumers away from the use of private vehicles to support the decarbonisation of Northern Ireland.

We welcome the commitment by Translink to work closely with the Consumer Council and DfI in order to monitor performance. A key challenge emerging from previous monitoring is to identify how to bridge the gap that sometimes occurs between the statistically recorded experience of customers and the results of the statistical monitoring from observation by Translink agents. It is important that Translink and DfI agree a robust system of monitoring that provides independent data. Key to this will be extending the use of real time information monitoring.

We welcome the commitment from Translink to invest in its workforce. A focus on customer care in recent years has improved customer satisfaction. However, our consumer research demonstrates that improvements can still be made, in particular regarding understanding and addressing the accessibility needs of consumers.

#### **4. *Strategic Objective: Continuous Improvement***

##### **Do you agree with the actions and targets as set out under this objective?**

We support the actions outlined in this objective. The targets proposed relate to punctuality and reliability, issues which consumers have consistently told us are their top priorities for public transport services.

However, given the stated ambition is continuous improvement it is disappointing that Translink has not committed to improving its punctuality above the >95% target which it set in its previous strategy.

DfI is currently developing a new Public Service Agreement (PSA) for Translink which will contain punctuality and reliability targets along with other performance indicators. The targets and performance indicators contained in the PSA will constitute a contract between Translink and DfI and therefore targets within this strategy should be at least as challenging as those in the PSA.

The Consumer Council will work with DfI and Translink to ensure that objectives and targets within the PSA align with consumer priorities and lead to continuous improvement in Translink services.

#### **5. *Strategic Objective: Customer Focus***

**Do you agree with the ethos and direction of travel set out under this objective?**

We agree with and support the ethos and direction of travel set out under this objective and note this is an area where Translink can make significant improvements. Embedding consumer engagement in the heart of business practice and using insights gained from engagement to deliver service improvements has become a central practice of high performing businesses and a key focus in regulated industries.

Therefore, within this objective we would welcome a commitment from Translink to engage directly with its current and potential users. Building consumer engagement into business as usual activities would enable Translink to better understand the level of public awareness of public transport services and the needs, expectations and priorities of users. This is essential to improving customer satisfaction and attracting new passengers. A consumer engagement focus is more important than ever to ensure Translink deliver a service that contributes to the decarbonisation of transport and meets the challenge to 'build back better' post Covid-19, by delivering improved customer outcomes. This strategy will not deliver the service consumers need and want if it is not designed with an understanding of their needs.

The Consumer Council undertakes regular consumer engagement and would welcome the opportunity to work with Translink to provide independent surveys of passengers. We will continue to work closely with Translink as more detailed actions and targets are developed.

#### **6. *Strategic Objective: Customer Focus***

**Do you agree with the actions and targets as set out under this objective?**

We welcome the new target of 90% customer satisfaction, and acknowledge that this is an increase from the 85% set in the previous strategy. The targets and performance indicators being developed for the new PSA will constitute a contract between Translink and DfI, and therefore targets within this strategy should be at least as challenging as those in the PSA.

Translink should set a target for the number of complaints that it receives as is the case in its current 'Get On Board' Strategy. More detailed targets on dealing with complaints, such as the time taken to deal with a complaint, should continue to be included in its Passenger Charter.

Translink should create a target within its strategy to engage with consumers as it starts to deliver its new strategy.

### ***7. Strategic Objective: Climate Action***

#### **Do you agree with the ethos and direction of travel set out under this objective?**

As the main government subsidised provider of public transport services in Northern Ireland Translink must be a leader and role model in decarbonising its services. We therefore welcome the recognition given by Translink of the significant role it has to play in decarbonising the NI transport sector and the priority it has given to this.

Translink has a key role to play not only in the manner in which it delivers its own services but also in integrating its services with a range of transport options that will contribute to decarbonisation, such as Active Travel, Demand Response Transport and Shared Transport, such as car sharing and taxi travel.

We reiterate that in designing its services, Translink must engage with consumers. Recent research by the Consumer Council found that consumers are aware of and value environmental benefits from more sustainable travel.

Our research found that consumers wish to see Translink accelerate its programme of decarbonising its fleet. If consumers perceive public transport as being a more sustainable option than private cars it will help encourage them to switch to public transport.

We commend Translink on its achievement of Platinum status in the Business in the Community Northern Ireland Environmental Benchmarking Survey. Furthermore, we are pleased to see that Translink will continue to be benchmarked against the very best organisations in climate emission reduction.

#### ***8. Strategic Objective: Climate Action***

**Do you agree with the actions and targets as set out under this objective?**

We welcome the ambitious actions and targets set by Translink of a 50% reduction in current emissions by 2030, net zero by 2040 and to be climate positive by 2050. Translink should set and publicise clear milestones to be achieved on its decarbonisation journey. This will help consumers understand the steps required to achieve these goals and enable them to assess Translink's progress. As consumers become more environmentally aware and concerned about how their transport choices affect climate change they are likely to have an increasing appreciation for sustainable transport options. If consumers are provided with quantifiable evidence of how their public transport provider contributes to decarbonisation, it will encourage them to use public transport.

#### ***9. Strategic Objective: Connecting Communities***

**Do you agree with the ethos and direction of travel set out under this objective?**

We welcome the commitment from Translink to lead the development of an integrated transport network for Northern Ireland.

Aside from a commitment to integrate with Active Travel options, this objective focuses mainly on the ambition of Translink to develop its own existing network and infrastructure. Whilst this is a positive and welcome commitment, consumers need Translink to be at the centre of an integrated public transport network, which goes beyond the Translink network and infrastructure.

Translink should commit to a wider objective regarding the integration of transport services. This should focus on enabling the integration of community transport services, demand responsive transport services, shared transport options and private bus operators into the public transport network, in circumstances where they would complement and improve the network.

We welcome the commitment by Translink to provide cost effective rural services. The need to focus on rural transport is borne out in our recent research. This research shows that the low frequency of public transport services means it is not a viable or convenient option for many rural dwellers to depend on.

As not all rural services are cost effective, to achieve the rural network that consumers want, will require Translink to integrate its service provision with that of other service operators, such as Community Transport organisations.

#### ***10. Strategic Objective: Connecting Communities***

##### **Do you agree with the actions and targets as set out under this objective?**

We welcome the ambition shown by Translink in its goal of increasing passenger numbers towards 100m per annum from the 'Get on Board' target of >85m. This will be particularly challenging considering the devastating impact that Covid-19 has had on Translink passenger numbers. The PSA being developed by DfI for Translink should consider a binding target on passenger numbers for Translink which takes into consideration the impact of Covid-19 and is reviewed annually to account for this.

The strategy proposes a target of ensuring that more than 80% of people in Northern Ireland have access to a public transport connection. According to statistics from the DfI Northern Ireland Travel survey in 2017-2019, just over 8 in 10 households (81%) lived within a 13 minute walk of their nearest bus stop. Therefore, this does not appear to be a challenging target. We would welcome clarification from Translink as to its definition of

‘access to a public transport connection’, in order to determine if it is more ambitious than the Travel survey findings. If it is not, Translink should increase its ambition level.

**11. Do you think there are any objectives missing that you would expect to see there?**

We have outlined a number of objectives that we would like to see included in the relevant sections.

**12. What elements of the strategy/objectives are most relevant or of interest to your organisation and your organisational goals and ambitions?**

As the statutory representative of Northern Ireland consumers our key function in transport is to make recommendations on matters affecting road or railway passenger transport services. As such we are interested in all aspects of the Better Connected strategy.

Our draft Corporate Plan 2021-2024 is designed to address four consumer priorities: the Covid-19 pandemic, EU Exit, decarbonisation and digitalisation. Each of these is relevant to public transport users but at the moment we would highlight the aspects of the Better Connected strategy that relate to the priorities of Covid-19 and decarbonisation.

To support emerging consumer priorities, we have identified five strategic objectives to define our work over the period of the Corporate Plan 2021-2024 and forward work programmes. These are:

- Understanding consumers
- Influencing policy
- Representing consumers
- Protecting consumers
- Empowering consumers

Each of these strategic objectives is relevant to the Better Connected Strategy and we look forward to working with Translink to achieve our mutual objectives.



**13. Do you identify any areas of common interest and shared goals within this strategy for your organisation? If so in what way.**

The Consumer Council has worked as partner with Translink for many years. We have worked together to understand the needs of passengers and improve all aspects of public transport in Northern Ireland. We are grateful to Translink staff for the collaborative and open manner in which they have engaged with us.

We will continue to represent consumers and work in partnership with Translink on the common interest areas of:

- Consumer engagement
- Complaints
- Accessibility
- Customer Information
- Performance monitoring
- Promoting public transport and active travel
- The Translink Public Service Agreement
- Infrastructure projects
- Fare Reviews
- Staff development
- Sustainability and decarbonisation
- Vulnerable consumers

**14. Would you see scope for closer collaboration and joint working on these areas? If so where and in what way?**

There are opportunities for more joint working and collaboration to further develop consumer information provision and Translink's consumer engagement practices. This is of particular importance in the context of the challenges raised by decarbonisation,

particularly the need to change consumer behaviour to achieve the Government's net zero targets.

**15. Is there anything missing from this strategy which you think would help us achieve our vision – or help your organisation achieve yours?**

As noted above a key focus of this strategy should be embedding consumer engagement into Translink's activities and the use of the resultant consumer insights to guide strategy. In addition, the strategy would benefit from a focus on value for money. Consumers have told us that in order to achieve modal shift public transport fares must be competitive with the private car. We recognise that Translink fares are subsidised by the NI Government and it is therefore important that it is sufficiently funded to achieve value for money for consumers.

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