

# Disability Action Plan 2017 - 2022

## 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 (NITHC) 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 (NITHC) 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 Chairman and Group Chief Executive of NITHC, 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:

Paula Logue  
HR Manager  
Floor 6, 22 Great Victoria Street  
Belfast  
BT2 7BJ  
Tel: 02890277871  
Email: [Paula.Logue@Translink.co.uk](mailto:Paula.Logue@Translink.co.uk)  
Textphone: 028 9038 7505 (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:

<http://www.translink.co.uk/corporatesite/publications/our-priorities/nithc-reports-information/>

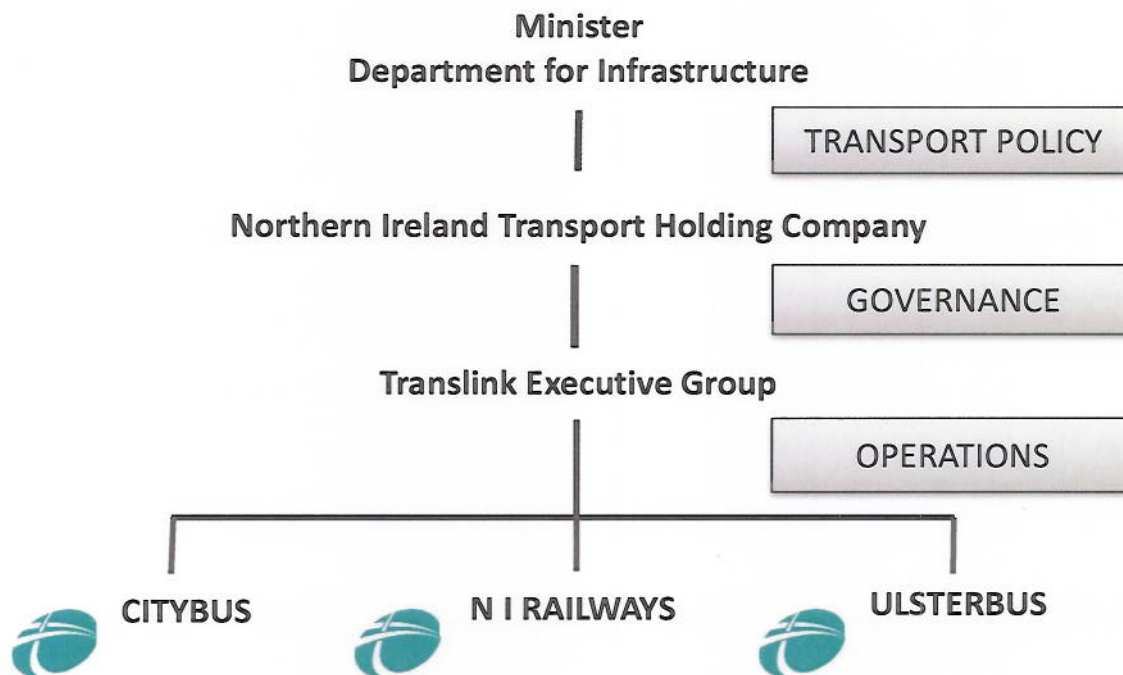
## **1.4 Functions**

Outlined below are the range of functions of NITHC.

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:



1.4.3 The NITHCo Board comprises of a Chairman, non-executive directors and three executives, namely the Group Chief Executive, the Chief Operating Officer and Chief Financial Officer of Translink. The Chairmanship is a non-executive position appointed by the Minister for Infrastructure for a renewable term of four years. The non-executive directors are also appointed by the Minister for a renewable term of four years. 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 <http://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.

## 2. Action Measures

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

### Measures to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life

Measures	Timescale	Performance Indicators/target
<p><b>Monitoring adverse impact</b></p> <p>Continual audit of gathered data information including staff disability ratios and disability related complaints.</p> <p>Consideration to the inclusion of a disability related question within Translink's Exit Questionnaires.</p>	<p>On-going</p> <p>Sept 2017</p> <p>Dec 2017</p>	<p>Continued collection and collation of existing data and the commissioning of new data as necessary to ensure no adverse impact.</p> <p>Decision made based on the potential benefits gained and consideration of the resources required to implement and monitor this change.<sup>(1)</sup></p> <p>Implementation</p>
<p><b>Monitoring and Review of DAP</b></p> <p>Review of existing and future action measures</p> <p>Expansion of the representatives within the group to better represent the organisation as a whole.</p>	<p>Commencing June 2017</p> <p>As Stated</p>	<p>Completed by the equality working group on a quarterly basis. Progress of this will be reported in S75 annual reporting, published on the website.</p> <p>Nomination and appointment of appropriate representatives to the Equality Working Group (EWG) in order to ensure all key areas of the organisation will be represented by a key influencer.<sup>(1)</sup></p> <p>To be included as an agenda item for the Equality Working Group meeting once per annum.</p> <p>When selecting additional members, preference will be given to those who can best represent disability groups and be in a position of influence for to drive change.</p>



<p>Continued partnership with disability groups and charities to work together in raising awareness among employees through appropriate training.</p> <p>Revise existing disability training packages.</p>	<p>Expected 2018</p> <p>By June 2017</p> <p>On-going throughout the year, annually for participants.</p> <p>On-going</p> <p>On-going annually</p> <p>2018</p>	<p>of Professional Competency (CPC) training within first 3 months of employment and refresher training through staff briefing days.</p> <p>The Training department is currently designing standardised training packages tailored to each business area.</p> <p>Training effectiveness is measured by post training evaluations.</p> <p>DAP awareness campaign launch with staff including staff briefing, notice board posters and feature on Translink intranet</p> <p>Dementia friendly training will be embodied within the CPC training in future years alongside other targeted disability issues on an annual basis. Attendance is mandatory. <sup>(1)</sup></p> <p>Increased awareness for staff on disability issues relevant to their role. <sup>(1)</sup></p> <p>Employers for Disability Northern Ireland (EFDNI) training will continue whenever offered with a range of tailored sessions appropriate to varying roles within the organisation. <sup>(1)</sup></p> <p>A revision of existing training packages for customer facing staff to reflect current best practice effectively in conjunction with Action on Hearing Loss. <sup>(1)</sup></p> <p>Disability Accessibility Officer and IMTAC will review training requirements taking into considerations the outcomes of the Department for Infrastructure (DFI) Accessible Transport Strategy.</p>
<p><b>Influencing third parties</b></p> <p>Encouraging the implementation of 'Age-Friendly Cities' across NI.</p>	<p>As applicable</p>	<p>Further Commitment to help promote Age-friendly cities within N. Ireland via continued involvement as a key partner in the Age-friendly status in Belfast, Newry and Derry/Londonderry and consideration to similar involvement with</p>





<p>Development of the detailed design and implementation for Belfast Rapid Transit.</p>	<p>Consultation in 2017</p>	<p>departure summary details with guidance on the appropriate stands. This is particularly beneficial for those with cognitive disabilities and will minimise the mobility requirements as all details are held on the one screen. All screens are also feasibly incorporated for audio announcements.<sup>(2)</sup></p> <p>As part of the screening implementation project, Translink will be trialling an audio announcements which is incorporated into the delivery system at two depots. If successful the aim will be to roll out other locations.</p> <p>Ensuring appropriate opportunity is given to encourage feedback on proposals from a range of disability groups.<sup>(1)</sup> Working with the Dfl to help ensure the system is accessible to all.</p> <p>Translink have heavily involved the disability sector in the development of Belfast Rapid Transit and continue to seek assurance in relation to any future plans.</p>
<p>To promote positive attitudes towards disabled people within the organisation.</p>	<p>Commenced</p>	<p>Encourage disabled people to apply for vacancies within the group based on the skills they have using the following statement in all application forms: <i>'Translink will shortlist any disabled applicants who meet the essential criteria for the post. If you have a disability under this definition do you wish to be considered under this policy?'</i><sup>(2)</sup></p> <p>Translink can measure the success of this policy by comparing those who disclose a disability against those who want to avail of the recruitment scheme.</p>
<p>Close investigation of any disability related service user complaint.</p>	<p>2018</p>	<p>Increase participation and awareness by encouraging disabled staff and service users to submit articles for inclusion in Translinks up dated Intranet. Run a pilot article on disabled staff and users experiences of Translink.<sup>(2)</sup></p>

Continued engagement with Orchardville via EFDNI	On-going	Continued one-to-one meetings with each complainant to ensure an appropriate resolution is put in place. This ensures appropriate consideration of multiple identity deprivation issues faced by some disabled people is also given. The effectiveness of this will be monitored by a count of resolved complaints. <sup>(1)</sup>
To encourage applicants with disabilities.	On-going	Continue to encourage placements, providing work experience for disabled people to enhance their general employability via Orchardville. <sup>(2)</sup>
	On-going	Translink will evaluate all potential avenues in relation to placement requests.
	Dec 2018	Translink will continue to promote our vacancies via a link from the EFDNI website. <sup>(2)</sup>
Identify suitable posts where due consideration can be given to recruiting under the Workable Scheme for disability work placements. <sup>(1)</sup>		
<b>Consultation on the draft Disability Action Plan (DAP)</b>		
Maintain arrangements to provide documents in alternative formats.	Completed	Number of requests for alternative formats such as Braille, Audio, large print and minority language.
Send draft DAP to consultees.	Completed	DAP to be e-mailed/ posted to consultees.
Actively seek comments from a range of groups.	Completed	Actively engage with the Section 75 Reference Group.
Revise the DAP to take account of consultee comments.	Completed	Number of responses received
Submission to the Equality Commission Northern Ireland (ECNI).	June 2017	Approval by ECNI
		Collate responses and include in the revised DAP.

		Collate responses and reflect in the revised DAP.  Finalised DAP submitted to the ECNI
<b>Publication of the revised DAP</b>		
Publish DAP on website	Summer 2017	Published on <a href="http://www.translink.co.uk">www.translink.co.uk</a>  An easy read version can be made available upon request.
Send copies of the final scheme to consultees and stakeholders.	Summer 2017	All information relating to Translink can be made available in alternative formats on request by either contacting our contact centre on 028 90 66 66 30 or accessing the website on <a href="http://www.translink.co.uk">www.translink.co.uk</a>  Final approved DAP sent to all consultees and stakeholders
<b>Review of the DAP</b>		
Review of scheme conducted by the Equality Working Group.	Jun/Jul annually	The EWG meet quarterly to discuss any immediate issues with the current DAP with a full review of progress on an annual basis.
Include summary of the review in the Annual Progress Report.	Aug annually	EWG Review of DAP included in the annual progress report to the ECNI.

(1) Measure promotes positive attitudes towards disabled people.

(2) Measure encourages participation by disabled people in public life.

Signed by:



Frank Hewitt

**Chairman**



Chris Conway

**Group Chief Executive**

### **3. Appendix 1**

## **CODE OF PRACTICE ON THE EMPLOYMENT OF PEOPLE WITH DISABILITIES**

**1. Introduction**To realise the aims of its Equal Opportunities Policy Translink is committed to developing and applying relevant supporting employment policies and practices to seek to ensure the promotion of equalityEvery day people with disabilities face barriers that most non-disabled people would never think about. These barriers are not just physical, but can be psychological caused by negative assumptions, attitudes and reactions by non-disabled people. With a major change in attitudes and small practical changes to the working environment, more people who may be currently excluded could be engaged and included within Translink. Accordingly through our Code of Practice we aim to reduce the barriers that prevent people with disabilities from succeeding and thereby helping them to maximize their full potential in the area of access to and within employment.

### **2. Scope and Definition**

The definition of disability within the legislation is:

”someone who has a physical or mental impairment which has a substantial and long term adverse effect on his or her ability to carry out normal day-to-day activities.”

### **3. Aims and Objectives**

This Code of Practice sets out the development and implementation standards of good practice for disabled people, as follows:

## **Recruitment, Selection and Promotion:-**

Translink will take steps to ensure that people with disabilities who apply for jobs will know that they will receive a fair and equal opportunity. Translink will make reasonable adjustments to ensure our employment arrangements or premises do not put a disabled person at a substantial disadvantage compared with a non-disabled person.

Translink is therefore committed to:

- a) Employ people with disabilities on the basis of merit and in jobs suited to their aptitudes abilities and qualifications;
- b) Shortlist any disabled applicant who meets the essential requirements of the post;
- c) Collaborate with the various disablement agencies with a view to seeking advice and support in recruiting and retaining disabled people.
- d) Use the Employers for Disability NI job bulletin board to promote Translink and refer potential applicants to the careers section on the Translink website, thereby encouraging applications from people with disabilities.
- e) Make practical arrangements to assist the interview process, e.g. modifying testing procedures, providing an interpreter.
- f) Introduce a Disability Placement Scheme for the training and potential employment of disabled people.
- g) Ensure staff involved in the recruitment process is properly trained in matters of equal opportunities including matters of disability.
- h) Ensure that employees with disabilities are given equal consideration for promotion according to their abilities.

### **Training and Development:-**

Translink undertakes to:

- a) Ensure that people with disabilities have the same opportunity as other staff to develop their full potential within the organisation
- b) Become involved in work experience, training and education/industry placements
- c) Raise awareness of disability throughout the organisation, particularly through its “Dignity at Work Programme”.

### **Introduction and Integration into the Workforce:-**

Translink will ensure the integration of disabled staff into the workforce by:

- a) On appointment, ensuring the induction of the disabled employee into the organisation and work of the department; and
- b) Providing accommodation and/or equipment which is suitable for the needs of the disabled employee.

### **Staff Becoming Disabled:-**

Employees who are disabled or become disabled in the course of their employment should inform Translink about their disability.

Translink undertakes to consult with employees who are disabled in their present employment. When deciding what reasonable adjustment can be made, consideration will be given to the cost involved and the practicality of making the adjustment. Some examples which Translink will consider making for employees (or potential employees) include:

Adjustment to premises Flexible working Allocating duties to another person Altering working hours Assigning a different work place Modifying instructions or referral manuals Modifying procedures for selection testing or assessment Acquiring or modifying equipment or reference manual

Providing a reader or interpreter Providing additional supervision or support  
Retraining Physical adjustments.

### **Health Safety and Access to Buildings:-**

Translink will ensure, as far as is practicable, that disabled people have physical access to all its facilities and that employees with disabilities are provided with a safe environment in which to work.

### **Monitoring:-**

Translink monitors its applicants, workforce and the effectiveness of this Code of Practice regularly. Equality monitoring reports are prepared by the Human Resources Division and action points determined by the Executive Team.

### **Complaints:-**

Translink recognise fully the right of disabled people to complain about discrimination should it occur. Employee complaints should in the first instance be made under the established grievance procedure, to the manager in charge of the workplace.