



Northern Ireland Transport Holding Company

Disability Action Plan

**Drawn up in accordance with Sections 49A and 49B of
the Disability Discrimination Act 1995**

**as amended by the Disability Discrimination
(Northern Ireland) Order 2006**

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Translations and other formats

This publication is available, on request, in large-print, on disk, on audiocassette or in Braille. A Plain English summary version is also available and this can be provided in other languages on request. For information about obtaining a copy in any of these formats – or to request a copy in any other accessible format – please contact the Head of Corporate Services at NITHCo:

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This document can also be accessed on the Translink website at www.translink.co.uk/nithcdisabilityactionplan.asp

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1. INTRODUCTORY STATEMENT

The disability duties

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').

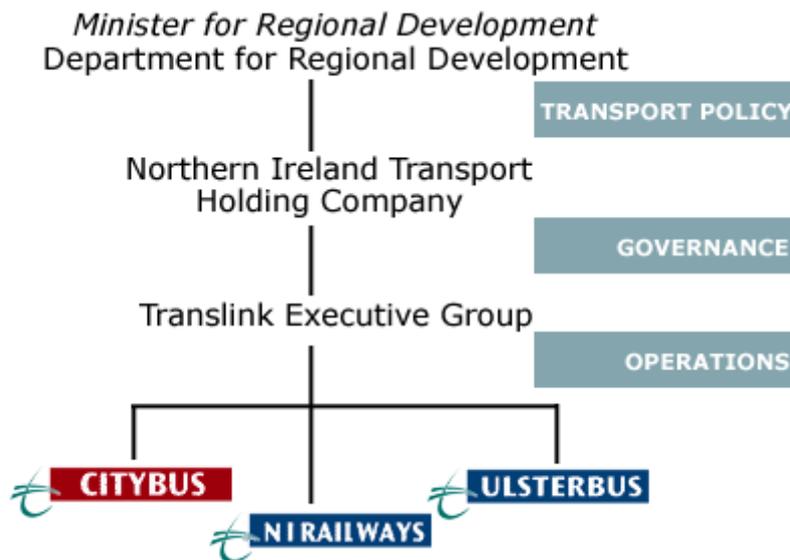
1.2 Under Section 49B of the DDA 1995, NITHCo is also required to submit to the Equality Commission a disability action plan showing how it proposes to fulfil these duties in relation to its functions.

Functions of NITHCo and Translink

1.3 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 Regional Development (DRD) which develops transport strategies for Northern Ireland and determines public transport policy.

1.4 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.

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



1.6 The NITHCo Board comprises a Chairman, non-executive directors and two executives, namely the Director of Corporate Affairs and the Chief Executive of Translink. The Chairmanship is a non-executive position appointed by Government for a renewable term of three years. The non-executive directors are also appointed by Government for a renewable term of three years. All the NITHCo Directors are also Directors of the subsidiary companies.

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

1.8 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.

1.9 Further information on NITHCo can be found on the Translink website at www.translink.co.uk/nithco.asp.

Public life positions

1.10 NITHCo has no responsibility for making public appointments as the members of the NITHCo Board are appointed by the

Department for Regional Development. 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.

Statement of commitment

1.11 As Chairman and Director of Corporate Affairs of NITHCo, we are committed to implementing effectively the disability duties and this disability action plan. We will allocate all necessary resources (in terms of people, time and money) in order to implement this plan effectively and, where appropriate, build objectives and targets relating to the disability duties into corporate and annual operating plans.

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

1.13 We are committed to engaging effectively with disabled people in the drafting, implementation, monitoring and review of this disability action plan and to ensuring that consultation is inclusive and targeted. 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 2 months is allowed. NITHCo and Translink already have arrangements in place to meet with IMTAC 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. In addition, we will consult with other organisations representing the views of disabled persons, taking into account any particular needs in relation to access to information.

1.14 The NITHCo Board will be responsible for the effective implementation of this disability action plan. The Director of Corporate Affairs will be accountable to the Board for the implementation, review and evaluation of the plan. NITHCo and Translink have established a joint Equality Working Group to direct the implementation of the Equality Scheme. This Group will also take responsibility for overseeing the day to day operations which will facilitate the development and implementation of this plan. The Translink Access Manager will also play a key role in the implementation of the plan.

1.15 The Head of Corporate Services will be the point of contact in relation to the plan; her contact details are –

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1.16 We confirm our commitment to submitting an annual progress report on the implementation of this plan to the Equality Commission and carrying out a full review by September 2010 when we undertake the five year review of our Equality Scheme.

1.17 A copy of the plan, our annual progress report to the Equality Commission and our detailed review of the plan will be made available on the Translink website, www.translink.co.uk.

Veronica Palmer OBE
Chairman, NITHCo and
its operating subsidiaries

Jim Aiken
Director of Corporate Affairs

2. PREVIOUS MEASURES TAKEN

2.1 In response to the Disability Discrimination Act 1995 NITHCo/Translink established a steering group chaired at senior executive level with a specific accessibility remit and appointed a full time Access Manager. A wide range of initiatives have been developed and implemented to improve accessibility to public transport for disabled people, particularly in respect of access to vehicles and rail and bus stations. More information can be found on the Translink website at www.translink.co.uk/accessibility.asp.

2.2 In addition NITHCo and Translink have already taken a number of key measures to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life. These are outlined below.

Promoting positive attitudes towards disabled people –

- photographs / images of disabled people using ‘mainstream’ public transport are used in practically all promotional and information material, including television advertising, corporate publications, policies and passenger information;
- design staff receive training to maintain best practice in all aspects of communication with / information for disabled people;
- NITHCo and Translink have an Equal Opportunities Policy which includes an appendix on the employment of disabled people (see Appendix 1) – this policy is currently being reviewed and updated;
- all front line staff are given specific disability awareness training – work is currently under way to develop a new specific programme for bus drivers and IMTAC will be consulted as part of this process;
- bespoke information sources for disabled people are provided – e.g. text phones, timetables in Braille or audio, etc;
- all information leaflets, including timetables, carry a statement drawing attention to the availability of alternative formats;

- the Translink website, which was designed in consultation with disability organisations, provides up to date timetable information and full contact details as well as the company's latest developments to improve access to services for all its customers (see www.translink.co.uk/accessibility.asp);
- we are currently conducting an EQIA of the Signage Policy as part of the implementation of the NITHCo Equality Scheme with particular attention to the needs of disabled people, including those with learning disabilities.

Encouraging the participation of disabled people in public life –

- regular meetings are held with IMTAC and Translink officers attend their meetings;
- disabled people have been encouraged to participate in Translink user groups and other public forums
- we have ensured that NITHCo Board meetings and information are fully accessible to disabled people.

3. ACTION MEASURES

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

Measures

3.2 We will continue to implement the previous measures set out in section 2 above to promote positive attitudes towards disabled people and encourage the participation of disabled people in public life.

3.3 We will adopt a mainstreaming approach so that consideration of the disability duties is incorporated into the development of all policies at the appropriate stages and becomes central to policy decision making. We will revise the screening template we use in relation to screening policies under Section 75 of the Northern Ireland Act 1998 to include a further question relating to the disability duties and will ensure that all officers involved in policy development have the skills and knowledge to assess the potential implications of each policy for the disability duties.

3.4 We will also review our existing policies to determine whether they encourage disabled people to participate in public life or promote positive attitudes towards disabled people and whether there are opportunities to better promote positive attitudes or encourage participation. Where it appears that a policy has an adverse effect on the promotion of positive attitudes or the encouragement of participation in public life we will give due regard to the need to revise the policy. We will also give due regard to the need to develop new policies. This review will be carried out on a systematic basis over the next six months and the findings will be subject to consultation with appropriate groups and individuals.

3.5 We acknowledge that in order to effectively implement the disability duties, we must ensure disability equality in the way we employ disabled people. Therefore, in reviewing our policies, we will pay particular attention to employment policies. We are currently reviewing and updating the Equal Opportunities Policy (including the Code of Practice on the Employment of People with

Disabilities) and we are also undertaking an EQIA of the Recruitment Policy as part of the implementation of our Equality Scheme. These will assist us to consider additional ways to promote a positive image of disabled employees, for example, by identifying positive role models.

3.6 We also acknowledge that, in order to promote positive attitudes towards disabled people, we must consider what appropriate and effective measures we can take as regards our external and internal communication policies, practices and procedures. We will therefore give particular consideration to these policies as part of the review and will examine the potential to develop a code of practice on communication with disabled people, setting out minimum standards and guidelines in respect of all forms of communication, including the use of new technologies. We are currently undertaking an EQIA of the Signage Policy and this will help us to further develop our approach to clear and consistent communication with disabled people, including people with a learning disability.

3.7 We will make all staff and Board Members aware of the disability duties, this disability action plan and our commitment to the successful implementation of the plan. We will provide training for all staff and Board members involved in the implementation and/or monitoring of this plan.

3.8 We will also revise and upgrade the disability awareness training for front line staff, in conjunction with IMTAC, to include references to the new disability duties and to emphasise the need to display positive attitudes towards disabled people. In addition, we will include awareness training on disability duties in induction courses.

3.9 We already have in place a well established network of user and consultation groups which contribute to the policy development process and which involve disabled people. We also have regular meetings with IMTAC and Translink officers attend their meetings. In order to further encourage disabled people to participate in user and/or consultation groups we will ensure that information about these groups and any new opportunities that arise are brought to the attention of organisations representing the views of disabled people and also draw attention to them on our website.

Timescale

3.10 The timescale for the continuation of measures we have taken previously has already been agreed. In relation to new measures, we have prioritised the review of policies and training and awareness raising. We intend to complete the review of existing policies within 6 months of submitting this disability action plan to the Equality Commission. Any actions arising from the review will be implemented within the following 6 months. Training and awareness raising activities will begin immediately after the submission of this disability action plan to the Equality Commission.

Performance indicators

3.11 We have identified performance indicators for all proposed action measures and targets where appropriate. These are included in the summary table below. In addition to these performance indicators, we will monitor any relevant service complaints or feedback, for example about disability harassment or regarding the display of negative attitudes.

3.12 All performance indicators will be reviewed on an annual basis.

Summary

3.13 The table below summarises the action measures, timescale and performance indicators and/or targets we will employ in order to fulfil the disability duties in relation to our functions.

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

Measures	Timescale	Performance indicators/ targets
1. Continue to include images of disabled people in promotional and information material	Ongoing	1. Number of photographs/images used per year – target: increase per year
2. Continue to train design staff to maintain best practice in all aspects of communications/ information for disabled people	1 course per year	2. Number of staff trained – target: 100% of design staff trained
3. Complete the review of the Equal Opportunities Policy, including the Code of Practice on the Employment of People with Disabilities	Complete by December 2007	3. Number of actions implemented as a result of the review
4. Continue to draw attention to and provide bespoke information sources for disabled people	Ongoing	4. Number of requests for timetables in accessible formats
5. Complete the EQIA of the Signage and Recruitment Policies	Complete by December 2007	5. Number of actions implemented as a result of EQIA
6. Continue to hold regular meetings with IMTAC	Approx. every 2 months	6. Number of actions implemented as a result of meetings
7. Continue to attend IMTAC meetings	Approx. every month	7. Number of meetings attended

Measures	Timescale	Performance indicators/ targets
8. Mainstream consideration of disability duties into the policy development process and assess the implications of proposed policies for the disability duties when carrying out screening in accordance with the Equality Scheme. Amend the screening template to include questions on the disability duties	Template amended by July 2007 Screening as and when appropriate	8. Number of screening reports per year identifying implications for the disability duties
9. Review existing policies in relation to the disability duties. Revise existing policies accordingly and/or develop new policies	Complete by December 2007 Revisions complete by June 2008	9. Number of policies revised/developed
10. Upgrade disability awareness training for front line staff, in conjunction with IMTAC, to include references to the new disability duties and to emphasise the need to display positive attitudes towards disabled people	From July 2007	10. Percentage of staff who have been trained – target: 100% of front line staff trained
11. Include awareness training on disability duties in induction courses	From July 2007	11. Number of staff undertaking induction course – target: 100% of all new employees to have undertaken induction course

Measures	Timescale	Performance indicators/ targets
12. Draw disability duties to the attention of all staff utilising standard channels of communication (team briefings, notice boards, staff magazine etc.)	Complete by November 2007	12. Number of communication channels utilised
13. Provide training on disability duties for all staff and Board members involved in the implementation and/or monitoring of this plan	Complete by November 2007	13. Number of staff and Board members undertaking training
14. Encourage disabled people to participate in User Group and consultation meetings by providing information and drawing attention to new opportunities	Ongoing	14. Number of disabled people participating

4. PUBLICATION OF THE DISABILITY ACTION PLAN

4.1 A draft version of this disability action plan was published for consultation in April 2006 and comments were invited from a range of organisations representing the views of disabled people. We very much appreciate the comments received and have reflected them in this final version of the plan.

4.2 The final disability action plan is now available on the Translink website at www.translink.co.uk/nithcdisabilityactionplan.asp. Attention has been drawn to the plan through the use of press releases and by notifying those who responded to the consultation.

4.3 This disability action plan will be made available, on request, in alternative formats, for example, in Braille, on computer disk, on

audio cassette or in large print or any other accessible format. A Plain English summary of the plan has been prepared and can be made available, on request; this may be of use to people with a learning disability and those for whom English is not the first language. We also have arrangements in place to provide copies of the plan in other languages, on request.

Appendix 1**CODE OF PRACTICE ON THE EMPLOYMENT OF
PEOPLE WITH DISABILITIES**
(currently under review)**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 equality.

Every 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 as follows:

“A person has a disability for the purpose of the Act if he has a physical or mental impairment which has a substantial and long term effect on his 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:

3.1 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) Collaboration with the various disablement agencies with a view to seeking advice and support in recruiting and retaining disabled people.
- d) State in appropriate advertisement that applications from people with disabilities with suitable qualifications are particularly welcome;
- e) Make practical arrangements to assist the interview process, e.g. modifying testing procedures, providing an interpreter.
- f) Ensure staff involved in the recruitment process are properly trained in matters of equal opportunities including matters of disability.
- g) Ensure that employees with disabilities are given equal consideration for promotion according to their abilities.

3.2 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 organization, and
- b) Are involved in work experience, training and education/industry placements,
- c) Raise awareness of disability throughout the organization, particularly through its "Dignity at Work Programme".

3.3 Introduction and Integration into the Workforce

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

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

3.4 Staff Becoming Disabled

Translink undertakes to consult with employees who become 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
- Modifying duties to another person
- Altering working hours
- Assigning a different work place
- Allowing a person with disabilities to be absent for rehabilitation, assessment or treatment
- Acquiring or modifying equipment or reference manuals
- Providing a reader or interpreter
- Providing additional supervision or support

3.5 Health Safety and Access to Buildings

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

3.6 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.

3.7 Complaints

Translink recognize 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.