



**Northern Ireland Transport Holding Company and
Translink**

EQUALITY IMPACT ASSESSMENTS

STAGE 7 MONITORING REPORT

JUNE 2010

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Access to documents

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This document, the ten individual final EQIA reports and other documentation relating to the Equality Scheme can be accessed on the Translink website at www.translink.co.uk

Various references to earlier reports are made throughout this document. Each of the earlier reports is still available and can be accessed on the Translink website. Hard copies and copies in alternative formats can be made available on request.

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1. Background Information

1.1 Section 75

Under Section 75 of the Northern Ireland Act 1998, the Northern Ireland Transport Holding Company (NITHCo) is 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
 - sexual orientation
- between men and women generally
- between persons with a disability and persons without and
- between persons with dependants and persons without.

Without prejudice to the obligations set out above, NITHCo is also required **to have regard to the desirability of promoting good relations between persons of different religious beliefs, political opinion or racial group.**

Schedule 9 of the Act sets out the detailed procedure for the implementation of this duty including the publication of an Equality Scheme and the conduct of Equality Impact Assessments (EQIA) of selected policies. In response to the Act, NITHCo prepared an Equality Scheme which was approved by the Equality Commission in September 2005. The Equality Scheme can be accessed on the Translink website at www.translink.co.uk/nithcequalityscheme.asp.

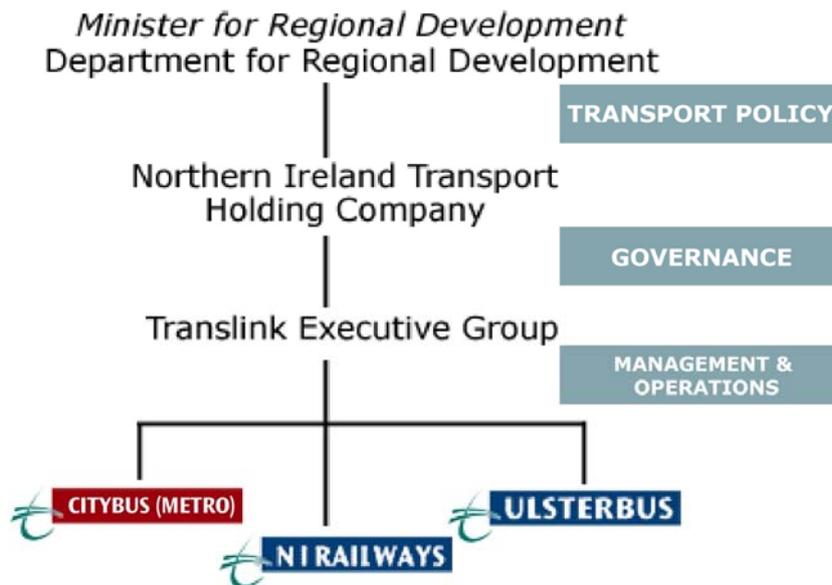
1.2 NITHCo and Translink

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 bus 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.

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.

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



1.3 Screening of policies

The Equality Scheme includes a commitment to applying a systematic screening process to all current policies to determine whether they are likely to have significant implications for equality of opportunity. NITHCo and Translink undertook screening of all current policies during 2006 and determined that the following policies could have significant implications for equality of opportunity and that EQIA should be undertaken –

- Signage
- Fares
- Refunds
- Recruitment
- Sickness Absence
- Job Sharing
- Bereavement and Special Leave
- Ill-Health Early Retirement
- Redundancy
- Dress Code

Each EQIA considered how the policy might affect various people, whether the effects were likely to cause any differential impacts on people in the nine categories defined in Section 75 and whether any of the differential impacts were likely to be adverse. Each assessment was based on an analysis of available data and research and the experience of Translink officers in developing and implementing each policy.

A draft EQIA report on each policy was prepared and issued for consultation in September 2007; the comments received and the NITHCo/ Translink response were set out in full in separate final EQIA reports published in September 2008. These documents can be accessed on the Translink website www.translink.co.uk together with a summary report of the whole process.

2. Stage 7 Monitoring Process

In line with Stage 7 of the Equality Commission Guidance, the final EQIA reports included a process for monitoring each policy to determine the future equality impacts, in the light of the changes made and the mitigating actions taken. The purpose of monitoring policies which have been subjected to EQIA is to determine whether the impacts predicted, particularly those which may have an adverse impact on anyone in the Section 75 equality categories, have occurred in practice and whether the impacts are greater or lesser than anticipated.

If the monitoring and analysis of results over a two year period show that the policy results in greater adverse impact than predicted, or if opportunities arise which would allow for greater equality of opportunity to be promoted, NITHCo and Translink are

committed to ensuring that the policy is revised to achieve better outcomes for the relevant equality groups.

The monitoring process includes the following qualitative and quantitative approaches –

2.1 Qualitative monitoring

Translink has a close working relationship with IMTAC and holds joint meetings on a regular basis. Any issues regarding how any of the policies affect disabled people are discussed through this forum.

In addition, NITHCo has established a Section 75 Reference Group which meets on an annual basis. This includes a number of voluntary organisations and provides an opportunity for them to bring any issues or problems to the attention of NITHCo/Translink. The group has been invited to report on any aspects of Translink policies causing concern to the people they represent.

The Translink Area User Groups are also invited to comment on the policies on a regular basis.

2.2 Quantitative monitoring

(a) Passengers

The Translink passenger survey continues to collect some information on the Section 75 characteristics of passengers. Gender and age are recorded on a regular basis and questions about marital status, disability and number of dependants have been asked on particular occasions in connection with particular questions.

(b) Employees

Translink now monitors all applicants for posts against the 9 Section 75 categories. A survey of existing staff was carried out in November 2007 to obtain further information on the categories not included in the equal opportunities monitoring form when they were appointed. Translink is therefore able to monitor all policies affecting employees, including the Job Sharing Policy, against most of the Section 75 categories.

3. Findings of the EQIAs

The EQIAs identified potential impacts on people in the various equality categories as follows –

A. Signage Policy

The EQIA showed that there may be minor differential impacts on young people and older people but that the most significant adverse differential impact is for people with disabilities which restrict their ability to see, read or understand signage.

It was agreed that mitigating action should be implemented in order to improve the consistency of signage at bus and rail stations, especially in respect of temporary signs.

B. Fares Policy

The EQIA analysis showed that the current Fares Policy (in conjunction with the Government's concessionary fares policy) was being effective in ensuring that public transport is a reasonable option for all members of society. The conclusion of the EQIA was that the current Translink Fares Policy does not result in any adverse differential impact for any group of people within the Section 75 categories.

C. Refunds Policy

The EQIA concluded that there were theoretical adverse differential impacts for older people and disabled people (who travel on concessionary fares) as the policy does not provide them with redress when they are subject to delay. However, further discussions with the DRD resulted in agreement that the current approach is the most practical and equitable option. DRD are firmly of the opinion that there is no negative discrimination against beneficiaries of concessionary fares.

The conclusion of this EQIA was therefore that the current approach to refunds should remain unchanged.

D. Recruitment Policy

The EQIA showed that the main equality issues in relation to the Recruitment Policy were the under-representation of women, disabled people, young people and older people among the workforce and applicant pool. There was also an issue in relation to language skills.

However, the policy as a whole is based on best practice guidelines and the EQIA concluded that it makes a positive contribution to the promotion of equality of opportunity and that there was no need to make changes to it.

Translink has an ongoing commitment to addressing the under-representation of groups within the workforce and implements a wide range of initiatives designed to increase the number of applicants in certain groups. It was agreed that these initiatives were more than sufficient to address the adverse differential impacts identified during the EQIA. The results of individual initiatives are published on an annual basis as part of Translink's response to the Fair Employment and Treatment Order.

E. Sickness Absence Policy

The conclusion of this EQIA was that the policy has no differential impacts on people in any of the Section 75 categories. It was agreed that the Translink policy reflects best practice and takes account of the need for consistent monitoring and early intervention and that no changes were necessary. However, it was agreed that further steps should be taken to ensure that staff are fully aware of the policy and procedures.

F. Job Sharing Policy

The EQIA concluded that there is a potential adverse differential impact on young people and women because they are less likely to meet the 3 year eligibility criterion for job sharing. Opportunities were also identified to better promote equality of opportunity for disabled people and those without dependants by revising the priority criteria.

It was therefore agreed that the eligibility and priority criteria should be reviewed and revised.

G. Bereavement and Special Leave Policy

The conclusion of this EQIA was that the current provisions regarding bereavement leave on the death of an employee's in-laws could have an adverse differential impact on people who are not married, including those in same sex relationships. It was clear that those who are married could benefit from this provision, whilst those who are not married will not.

It was therefore agreed that the policy should be amended to remove the specific reference to in-laws and allow bereavement leave to an employee whose partner's mother or father dies, where this person was a member of the household.

H. Ill-health Early Retirement Policy

The conclusion of this EQIA was that that the current policy does not have any adverse differential impacts. It was agreed that the current policy reflects best practice and is working effectively.

I. Redundancy Policy

The conclusion of this EQIA was that the current provisions regarding the use of particular objective criteria to identify employees proposed for redundancy selection may result in an adverse differential impact on young people and women. There was no reason to believe that the discipline or attendance criteria, which are weighted equally, would have a differential effect on any groups of people within the Section 75 categories. However, the length of service criterion was likely to result in more young people and women being proposed for redundancy selection than expected given the relative numbers in the workforce as a whole.

It was agreed that it was reasonable and within best practice parameters to use length of service as one element of a redundancy selection procedure, and this approach had been agreed with the Trade Unions. The length of service criterion is less heavily weighted than the other two and this would mitigate the impact on young people and women employees. It was therefore agreed that the policy should not be amended but should be monitored carefully with particular attention to age and gender, to determine whether any adverse differential impacts actually arise. However, it was not expected that the policy would be

implemented on a frequent basis as Translink rarely needs to declare a redundancy situation.

J. Dress Code Policy

The conclusion of this EQIA was that the policy had no actual or potential adverse impact on any group of people.

4. Action Plan

As a result of the EQIAs, NITHCo/Translink adopted an action plan designed to reduce or eliminate the differential impacts identified.

This is set out at Table 1 overleaf together with notes on actions taken to date.

Table 1: Action Plan

Policy		Action	Notes
Signage	1.	Update the guidance to station managers on the format and location of signs.	Completed.
	2.	Include a foreword in the corporate identity manual clarifying the principles for providing clear and consistent signage which promotes equality of opportunity.	Completed.
	3.	Complete the programme of renewal of signage which is currently under way.	Completed.
	4.	Complete the audit of local signs at all manned stations and agree a bespoke solution for each station which conforms with best practice and promotes equality of opportunity.	Audit completed. Solutions rolled out across the network.
	5.	Implement the proposed improved signage solution at each Ulsterbus location.	In progress.
Sickness Absence	6.	Take further steps to ensure that communication of the policy is effective.	Completed.
Job Sharing	7.	Review and revise the eligibility and priority criteria.	Completed.
Bereavement and Special Leave	8.	Amend the policy to remove the specific reference to in-laws and notify employees of the changes.	Completed.
All policies	9.	Implement monitoring system.	In progress.

5. Results of Monitoring

Since the publication of the final EQIA reports in September 2008, there have been very few applications for job sharing and no reported instances of requests for bereavement leave in respect of a partner's mother or father. It has therefore not been possible to identify any impacts of the changes made to these policies; monitoring will continue to determine whether there is any effect over a longer period of time.

With regard to the Signage Policy, considerable progress has been made –

- bespoke signage solutions have been rolled out to all stations across the Northern Ireland Railways network, with the exception of integrated rail/bus stations which will be addressed separately;
- terms of reference have been drawn up to allow the commissioning of a design agency and signage manufacturer to develop a signage solution for the Ulster bus network which will be consistent with the NIR approach; however, funding is not available at this time to progress the project;
- £7m of funding has been allocated for the review and refurbishment of stations to meet the requirements of the Disability Discrimination Act; this will address some signage issues, such as the height of signs and the need for signs in Braille;
- there are plans to review the signage at the Europa Bus Station which has the greatest footfall of all the stations in Northern Ireland;
- the roll out of new platform signage across the NIR network is in progress and will include the integrated stations at Belfast (Central and Great Victoria), Bangor and Coleraine;
- all station managers have been provided with templates for temporary signs which meet requirements in terms of size, font etc.; monitoring has shown that these are being used consistently across the network;

- the corporate identity manual is currently being revised and will include examples of signs to ensure that all signs ordered are of specific types which meet the needs of disabled people.

Feedback from managers shows that public reaction has been positive in terms of the improvement to signage and there have been no complaints or issues raised by the general public, IMTAC, the Area User Groups or the Section 75 Reference Group members. We therefore conclude that the actions taken have contributed positively to the promotion of equality of opportunity. We will continue to monitor the policies and evaluate the results of monitoring at regular intervals.

6. Publication of the Results of Monitoring

In line with the commitment in our Equality Scheme, we will make this report available on the Translink website at www.translink.co.uk and draw it to the attention of IMTAC, the Area User Groups and the Section 75 Reference Group. It will also be available in printed form and we will make arrangements so that it can be made available on request and in a timely fashion in formats such as Braille, large print, disk and audiocassette and in minority languages to meet the needs of those who are not fluent in English.