Section 75 and Schedule 9

The Northern Ireland Act 1998

Amendment to Translink Commercial Discounted Fares and Purchase of Singles Only Onboard NIR Services

Equality Impact Assessment

Consultation Findings & Final Decision Report

Equality Impact Assessment

CONSULTATION FINDINGS & FINAL DECISION REPORT

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Amendment to Translink Commercial Discounted Fares and Purchase of Singles Only Onboard NIR Services

An Equality Impact Assessment

1: INTRODUCTION

Under the statutory duties contained within Section 75 of the Northern Ireland Act 1998, the Northern Ireland Transport Holding Company (NITHCo), trading as Translink, is required to undertake an equality impact assessment (EQIA) for each policy or group of related policies where screening had indicated that there may be significant implications in relation to one or more of the nine Section 75 categories.

If you have any queries about this document, and its availability in alternative formats (including large print, Braille, disk and audio cassette, and in minority languages to meet the needs of those who are not fluent in English) then please contact:

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1.1 Section 75 and the Statutory Duties

Section 75 of the Northern Ireland Act 1998 requires each public authority, when carrying out its functions in relation to Northern Ireland, to have due regard to the need to promote equality of opportunity between nine categories of persons, namely

- between persons of different religious belief, political opinion, racial group, age, marital status, or 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 its obligations above, the public authority must also have regard to the desirability of promoting good relations between persons of different religious belief, political opinion, or racial group.

The Equality Commission for Northern Ireland (ECNI) approved the Northern Ireland Transport Holding Company (NITHCo) Equality Scheme on 27 February 2013. The Scheme was

reviewed and updated in 2021 and is currently undergoing its scheduled five-year review in line with ECNI guidance. Following approval of the Scheme, existing policies were screened to assess their impact on the promotion of equality of opportunity and good relations using the following criteria:

- Is there any evidence of higher or lower participation or uptake by different groups?
- Is there any evidence that different groups have different needs, experiences, issues and priorities in relation to the particular policy issue?
- Is there an opportunity to promote equality of opportunity between the relevant different groups, either by altering the policy, or by working with others in government or in the larger community, in the context of the policy?
- Have consultations with relevant groups, organisations or individuals indicated that policies of that type create problems specific to any relevant group?

In line with the statutory duties outlined above, Translink completed a Section 75 screening exercise in respect of the proposed fares changes and a separate screening exercise relating to the proposed Bus and Rail Evening Service Adjustments. Draft EQIAs were subsequently developed for both proposals and were subject to a public consultation exercise running from 8 July 2026 to 30 September 2026.

1.2 NITHCo and Translink

The Northern Ireland Transport Holding Company (NITHCo) is a public corporation established under the Transport Act (NI) 1967 to oversee the provision of public transport in Northern Ireland. NITHCo is accountable to the Department for Infrastructure (DfI) which develops transport strategies for Northern Ireland and determines public transport policy. NITHCo's responsibilities include holding and managing property assets and the oversight, in terms of support, control and supervision, of its private limited subsidiary companies. It is expected to operate commercially and has a duty to operate in line with Ministerial policy.

The NITHCo Board is responsible for approving the strategies of its subsidiary companies (see below) 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.

Translink is a trading name used by any one or more of the companies under the ultimate ownership of NITHCo. The Group comprises NITHCo as the parent company which owns Citybus Limited (which also trades as 'Metro') (NI009039), Flexibus Limited (NI006724), Ulsterbus Limited (NI006725), Translink (NI) Limited (NI006673), NIR Networks Limited (NI017638), Northern Ireland Railways Company Limited (NI006929) - each of which is registered in Northern Ireland and has its registered office at 22 Great Victoria Street, Belfast, Co. Antrim, BT2 7LX; and NIR Operations Limited (NI021091) - which is registered in Northern Ireland, with its registered office at Lanyon Place Station, 47 East Bridge Street, Belfast, BT1 3NR.

1.3 Background

Translink has recently outlined the significant financial pressures facing public transport, driven by rising costs and a reduction in funding in real terms. Based on the draft budget, Translink is currently projecting a material loss in the current financial year, which would leave the organisation in an unsustainable financial position.

As such, a change to promotional fares and removal/reduction of certain discounts is necessary to address the growing cost base and funding challenges Translink face. Translink continue to work closely with the Department for Infrastructure to champion greater investment in public transport, recognising its fundamental role in supporting social inclusion, economic participation and a greener future. In the context of ongoing budget uncertainty, there is a clear need to plan responsibly to ensure the network can continue to operate as sustainably as possible and as such, the below changes have been proposed.

Promotional Fares:

The proposed fare changes are detailed below:

- Reduction of yLink discount from 50% to 33%
- Removal of Off-Peak Day Return fares on Bus and Rail (Adult and Child)
- Increase to Promotional Fare Types:
    - Family and Friends (£24 to £26)
    - Metro Family Ticket (£10 to £12)
    - Bus Rambler (£10 to £12)
    - Sunday Day Tracker (Rail) (£10 to £12)

Onboard Ticket Purchase on NI Railways:

The introduction of Ticket Vending Machines (TVMs) and Platform Validators through the TFTS Programme represents a step change in how customers purchase and validate tickets across the rail network. With TVMs installed at all stations and halts, the primary point of sale shifts off-train, positioning conductors principally as revenue protection and customer support staff rather than ticket sellers.

Customers will continue to be actively encouraged to purchase tickets prior to travel using one of the following channels:

- TVMs
- Platform Validators (smartcards)
- mLink and other eCommerce channels

Key elements of this proposal are:

- Customers who board without a valid ticket will be able to purchase Single tickets only onboard
- Where a return journey is required, a further Single may be purchased on the return service

- All other ticket types (Returns, period passes and discount products) must be purchased off-train
- The policy applies network wide and is aligned with the availability of TVMs at every station

This approach maintains access to travel while making pre-purchase clearly more advantageous and convenient. In circumstances where customers are unable to purchase a ticket prior to boarding due to accessibility issues, ticket vending machine unavailability, or lack of digital payment options, conductor discretion will apply. This will ensure that passengers are not unfairly disadvantaged and aligns with established practice in similar ticketing policy changes.

Both proposals relate to adjustments to existing commercial fare products and sales channels and do not alter statutory concessionary entitlements or eligibility criteria. The policy would be operational and pricing-related in nature rather than a change to access.

2: CONSIDERATION OF AVAILABLE DATA AND RESEARCH

The Draft EQIA examined an array of data, against the context of the financial pressures facing public transport, driven by rising costs and a reduction in funding in real terms. Translink continues to work closely with the Department for Infrastructure to champion greater investment in public transport, recognising its fundamental role in supporting social inclusion, economic participation and a greener future.

Additional cost saving measures explored by Translink have been included in this section following feedback received during the consultation process, including comments regarding the consideration of alternative financial measures. While these measures were not part of the consultation proposal, they provide relevant context on the financial pressures facing Translink and the range of options considered. Their inclusion does not alter the substance of the proposal on which consultees were asked to comment or the EQIA undertaken.

In order to assess whether or not these proposals would have an adverse impact on any of the nine Section 75 categories, and to determine if action could be taken to further promote good relations, the consultation responses and associated evidence were analysed. A summary of the key findings in relation to available data and research is provided below.

Religious Belief

Census 2021 data indicates that 42% of people in Northern Ireland identify as Catholic, 37% as Protestant or other Christian denominations, and 17% as having no religion.

The 2023 Travel Survey for Northern Ireland shows broadly similar levels of public transport use by religious belief, with public transport accounting for 2% of journeys by Catholics, 4% by Protestants and 6% by those of other or no religion.

While robust public transport data by religious belief is limited, users within this Section 75 category may be affected by the proposed changes to discounts and the purchase of Single tickets only onboard NIR services.

Political Opinion

While robust public transport data by political opinion is limited, users within this Section 75 category may be affected by the proposed changes to discounts and the purchase of Single tickets only onboard NIR services.

Racial / Ethnic Group

Census 2021 data indicates that 97% of the Northern Ireland population identified as White and 13% of residents were born outside Northern Ireland. While robust public transport data by racial or ethnic group is limited, users within this Section 75 category may be affected by the proposed changes to discounts and the purchase of Single tickets only onboard NIR services.

The Translink Customer Satisfaction Monitoring Annual Report 2024/25 indicated that 96% of participants lived in Northern Ireland, 1.3% in Ireland, 1.6% in Great Britain and 1.1% in other countries.

Age

The Translink Customer Satisfaction Monitoring Annual Report 2024/25 indicated that 21% of respondents were aged 16–23, with 67% reporting high satisfaction with their most recent journey. Equality Commission research indicates that young people aged 16–29 are more reliant on public transport than other age groups, while Consumer Council research found higher reported dependency among younger consumers. The 2023 Travel Survey for Northern Ireland also indicates that those aged 0–24 make a higher proportion of journeys by public transport than older age groups, with bus travel particularly important for school and college journeys. Internal ticketing data indicates that concessionary journeys accounted for 14% of total passenger journeys in 2025/26, yLink journeys accounted for 10% of fare-paying journeys, and children made 19% of Off-Peak Day Return journeys.

The proposed changes do not remove statutory concessionary entitlements but may affect users within this Section 75 category through changes to promotional discounts and the requirement to purchase Single tickets only onboard NIR services.

Marital Status

Census 2021 data indicates that 49% of people in Northern Ireland were married or separated, 39% were single and 6% were divorced.

While robust public transport data by marital status is limited, users within this Section 75 category may be affected by the proposed changes to discounts and the purchase of Single tickets only onboard NIR services.

Sexual Orientation

While robust public transport data by sexual orientation is limited, users within this Section 75 category may be affected by the proposed changes to discounts and the purchase of Single tickets only onboard NIR services.

Men & Women Generally

Census 2021 data indicates that Northern Ireland has a population of approximately 1.9 million, comprising 51% female and 49% male.

The Translink Customer Satisfaction Monitoring Annual Report 2024/25 indicated that 52% of respondents were female and 48% were male.

Equality Commission research indicates higher reliance on public transport among women than men, although the 2023 Travel Survey for Northern Ireland shows broadly similar monthly bus or train use by males and females.

Users within this Section 75 category may therefore be affected by the proposed changes to discounts and the purchase of Single tickets only onboard NIR services.

Disability

Census 2021 data indicates that 8% of people in Northern Ireland reported their general health as bad or very bad, and that 12% of the population aged five and over provided regular unpaid care.

The Translink Customer Satisfaction Monitoring Annual Report 2024/25 indicated that 8% of respondents reported day-to-day activity limitations due to a lasting health problem or disability.

Equality Commission research indicates that disabled people are more reliant on public transport than non-disabled people and may face greater barriers in accessing services.

The 2023 Travel Survey for Northern Ireland indicates that both disabled and non-disabled people made 4% of their journeys by public transport. Users within this Section 75 category may be affected by the proposed changes, particularly where barriers to pre-purchase or digital channels arise.

Dependency

Census 2021 data indicates that 34% of households in Northern Ireland contained dependent children and 49% contained at least one person with a long-term health problem or disability. Users with dependants may be affected by the proposed changes where household travel costs or access to pre-purchase channels are relevant. In considering the Section 75 category of dependency, the potential impact relates to individuals who have dependants compared with those who do not. People with dependants may be more sensitive to changes in travel costs due to the cumulative impact of multiple journeys or family travel requirements. Where access to pre-purchase ticketing channels is limited, some passengers may have reduced opportunities to access lower fares, which could increase the cost of travel relative to those able to use these channels. These factors have been considered in assessing the potential impact of the proposal on this Section 75 category.

2.1 Alternative Cost-Saving Measures Explored

In parallel with the development of the proposed fare amendments, Translink has continued to identify and implement a range of cost-saving and efficiency measures within its delegated authority. These measures have been pursued in an effort to reduce expenditure, improve operational efficiency and minimise the impact on customers wherever possible.

The options explored and/or implemented include:

Headcount Control Measures

- Recruitment restrictions and vacancy management across the organisation.
- Careful review of staffing requirements and prioritisation of business-critical roles.

Service Optimisation Measures

- Review of service delivery arrangements to identify operational efficiencies.
- Optimisation of timetables, vehicle utilisation and resource deployment where feasible.
- Measures aimed at maintaining safe and reliable services while reducing operational costs.

Project Prioritisation

- Deferral or re-phasing of selected projects and programmes where operationally appropriate.
- Review of discretionary expenditure and non-essential activities.
- Prioritisation of investments required to maintain safety, regulatory compliance and essential service delivery.

Revenue and Cost Reduction Targets

- Delivery of savings targets across business areas.
- Review and control of discretionary expenditure.
- Ongoing identification of opportunities to reduce operating costs without adversely affecting safety or service reliability.

Commercial Optimisation

- Measures to maximise commercial income and revenue generation opportunities.
- Review of commercial activities and assets to improve financial performance.
- Continued focus on maintaining and growing passenger demand where possible.

Operational Efficiencies

- Review of customer service, cleaning and support service arrangements to identify efficiencies while maintaining appropriate standards.
- Use of fuel management and hedging strategies, where appropriate, to mitigate cost increases and improve budget certainty.

Translink remains committed to providing safe, reliable and accessible public transport services and recognises the important role public transport plays in supporting social inclusion, accessibility, connectivity and modal shift across Northern Ireland. The measures outlined above demonstrate that a range of alternative options have been considered and pursued to address the significant financial pressures facing the organisation. However, despite these actions, further measures have been considered necessary to address the financial pressures.

3: CONSULTATION PROCESS

(For further information regarding consultation on the proposals, please refer to: Public Consultation on fare and service changes | Translink)

The consultation was accessible on Citizen Space (the Government's on-line consultation hub), and also featured on Translink's website, for a period of 12 weeks from 8 July 2026 to 30 September 2026.

Individuals and groups could respond to the consultation in a variety of ways:

- Via the survey on Citizen Space
- Via email to faresfeedback@translink.co.uk
- Via post upon request of a hardcopy

With regard to the EQIA itself, and in order to consult as widely as possible on the findings and preliminary recommendations, the following communication and engagement activities were undertaken:

- A press release was prepared and submitted to various media outlets;
- A copy of the draft EQIA was posted on the website;
- Individual consultation meetings were offered with representatives of particular interest groups;
- The report was made available, on request, in alternative formats.

The closing date for responses was 30th September 2026.

4: CONSULTATION FINDINGS

4.1 Profile of Survey Respondents

Translink invited responses to the consultation through a number of routes; through the survey hosted on the Government's online Citizen Space portal; by email or by post.

In total, the consultation received 1,481 responses from various sources, all of which have been analysed and feature in this document.

Each response received during the consultation was treated equally for the purposes of analysis. Individual survey submissions were counted as one response each, while responses submitted by organisations representing members or stakeholders were counted as a single organisational response, irrespective of the number of individuals they represented.

In addition to responses received through Citizen Space, Translink received a number of submissions by email. Where these submissions did not align with the structure of the consultation questionnaire, they were considered in full and subjected to thematic analysis. The themes identified through this process were integrated into the overall assessment of consultation responses and informed consideration of the issues raised during the consultation.

Source	Responses
Citizen Space	330
Email	21
Union Submissions	1,130
Combined	**1,481**

Count of Citizen Space and Email Responses

TOTAL RESPONSES	CITIZEN SPACE	EMAIL RESPONSES	INDIVIDUALS OVERALL
351	**330**	**21**	**92.0%**
All submissions	Responses submitted online	Responses received by email	Share of all respondents

Summary:

- Citizen Space supplied 330 of 351 submissions (94.0%); email supplied 21 (6.0%)
- The combined respondent profile is 323 individuals (92.0%), 27 organisations (7.7%) and one unclassified response.
- Youth, students and yLink is the leading aligned topic: 193 mentions (55.0% of all submissions)
- Affordability follows at 139 mentions (39.6%); ticket access/digital exclusion appears in 96 (27.4%).
- Counts overlap and measure topics mentioned, not support or opposition. Rankings use the strongest constituent topic rather than adding overlapping codes.
- 1,130 campaign responses were analysed separately.

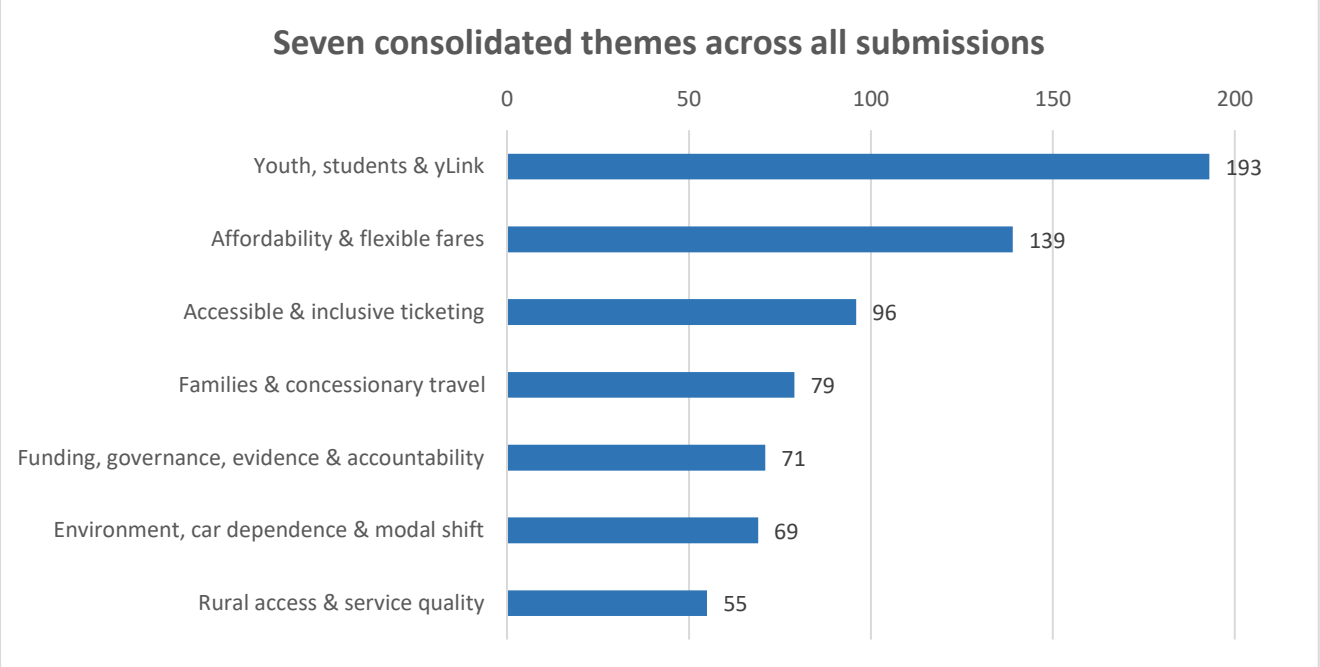
4.2 Methodology

The responses from Citizen Space were downloaded via a secure server and imported into Microsoft Excel. Email submissions were manually collated and categorised within Microsoft Excel. The datasets were then combined to create a single dataset for analysis.

A thematic analysis approach was used to identify key issues, concerns and potential equality impacts raised by respondents. To support data exploration and the identification of emerging themes Microsoft Co-Pilot was used to assist with summarising responses and grouping feedback into thematic categories. Specific prompts were used to summarise the datasets and organise into key themes. All outputs generated by Microsoft Co-Pilot were manually reviewed and cross-referenced against the raw data.

4.3 Key Themes and Findings

The consultation findings have been summarised under seven connected themes. Youth, students and yLink was the predominant response and is presented separately, reflecting its central role in access to education, employment, training and social participation. Families and concessionary travel form a related but distinct theme, covering household costs, caring journeys and mixed views on Senior SmartPass reform. Respondents also focused on affordability and flexible fares, barriers created by digital or machine-led ticketing, and the way rural service limitations can magnify fare changes. Higher prices and reduced flexibility were seen as potentially weakening public transport use and conflicting with modal shift objectives. Concerns about sustainable funding were closely linked to governance, transparency and the adequacy of the equality evidence. Across the consultation responses, the most prominent equality issues identified related to age, disability and caring responsibilities, with the potential impacts often compounded by socio-economic disadvantage and rurality. Overall, respondents expressed a preference for the retention of existing arrangements, revision of the proposals, or the introduction of additional mitigation measures, rather than implementation of the proposals as originally presented.



Theme 1: Youth, Students and yLink

This was the most frequently raised theme in both channels with 193 responses referencing youth, students and yLink. Respondents described the yLink discount as essential to keeping education, work, training and social activity affordable. Many argued that reducing the discount would fall on young people already facing high living costs and limited access to a car.

Respondents proposed retaining the 50% yLink discount, particularly during term time; consider wider student or youth concessions and assess impacts by route and journey purpose.

Theme 2: Families & Concessionary Travel

Respondents raised concerns that fare changes can multiply across a household and make family and caring journeys disproportionately expensive. Views on Senior Smartpass reform were mixed where some stressed independence and social inclusion while others supported means-testing, restricting travel to Off-Peak times or aligning the eligibility with pension age.

Respondents recommended protecting or expanding family products, ensuring access through all sales channels, recognising caring journeys and evaluating any Smartpass reform separately with transitional protection and an isolation assessment.

Translink recognises the views expressed by respondents on the Senior SmartPass and will continue to work closely with the Department for Infrastructure in considering these issues. The Northern Ireland Concessionary Fares Scheme is funded by the Department and administered by Translink on its behalf. Any consideration of entitlement criteria, including eligibility by age group, would therefore be taken forward collaboratively within the wider public policy and funding framework.

Theme 3: Affordability and Flexible Fares

Respondents considered the cumulative cost of higher fares, reduced discounts and fewer flexible products. There were concerns that essential and non-standard journeys could become unaffordable and that replacing returns with two singles or removing Off-Peak options could discourage travel.

Respondents proposed limiting or phasing increases, protecting lower-cost products, retaining Off-Peak and Day Return options, publishing journey level price examples and consider targeted affordability support.

Theme 4: Accessible & Inclusive Ticketing

This theme was focused on both customer access and equality compliance, not simply a preference for a purchase channel. Concerns raised were related to the proposal to restrict NIR onboard sales to Singles only.

Respondents challenged assumptions that everyone can use apps or ticket machines, have a bank card or working device or can explain a hidden condition to staff. Statutory concessions were not seen as removing barriers relating to dignity, confidence, flexibility and companion travel.

Respondents proposed preserving cash and onboard purchases, provide staffed or telephone alternatives, publish clear reasonable adjustment rules and prevent penalties where machines or apps are inaccessible or unavailable.

Theme 5: Rural Access & Service Quality

Respondents said that fare increases are more severe where services are infrequent, unreliable or cancelled. Rural passengers stressed that they had fewer routes, weaker interchange options and limited alternatives to public transport. The most affected groups identified were rural communities, people without cars, disabled passenger and those travelling for work, education, healthcare or caring duties. Risks including isolation, missed opportunities and reduced access to essential services. Email respondents consistently outlined that the EQIAs did not adequately address rural impact. The recurring asks were for a distinct, published Rural Needs Impact Assessment; clarity on DfI and Translink responsibilities; route-level and urban/rural evidence; engagement with community transport; and completion of the assessment before final decisions.

Overall, respondents suggested protecting frequency and route coverage, assessing proposals by route and geography, improving disruption arrangements and working with councils and community transport providers.

Theme 6: Environment, Car Dependence & Modal Shift

Respondents raised concerns that higher prices and reduced fare flexibility could push passengers towards cars, reduce patronage and conflict with goals for congestion reduction, emissions and decarbonisation. It was highlighted that the most affected groups would be passengers who can switch to driving, communities affected by congestion and people unable to drive who would remain exposed to higher costs.

Recommendations included testing proposals against modal shift and climate objectives, monitoring demand and mode switching and adjusting or reversing measures if adverse impacts emerge.

Theme 7: Funding, Governance, Evidence & Accountability

Respondents opposed transferring funding gaps or perceived overspending to passengers and asked for clearer evidence behind the proposals. Belfast Grand Central Station was frequently cited in concerns about priorities and trust, while unpublished internal data and broad impact statements within the consultation were criticised as insufficient for assessing cumulative effects.

Respondents recommended securing sustainable public funding, demonstrating efficiencies and governance improvements, publishing route, product, geographic and passenger level evidence, strengthening the EQIA and report on how feedback changes the decision whilst monitoring impacts.

4.4 Potential Equality Impacts Identified by Theme

Theme	Potential Equality Impact Raised Through the Consultation
Theme 1: Youth, Students and yLink	Age: a reduced yLink discount could disproportionately affect younger people in education, training or early employment. Socio-economic disadvantage may compound the effect where young people cannot afford a car.
Theme 2: Families & Concessionary Travel	Dependants, Age and Men & Women Generally: Higher household travel costs may affect parents and carers, while changes to senior entitlement could disadvantage older people at risk of isolation or on low incomes.
Theme 3: Affordability and Flexible Fares	Socio-economic disadvantage can compound impacts associated with Age, Disability and Men & Women Generally. Flexible fares may be particularly important for part-time and caring-related journeys.
Theme 4: Accessible & Inclusive Ticketing	Age & Disability: Digital or machine-led arrangements may create indirect disadvantage, force disclosure of disability and restrict access to employment, education, healthcare and community life.
Theme 5: Rural Access & Service Quality	Age, Disability & Dependents: Geography can intensify the impacts on these categories. The same fare or ticketing change may have a greater effect where no practical alternative exists.

Theme	Potential Equality Impact Raised Through the Consultation
Theme 6: Environment, Car Dependence & Modal Shift	Age & Disability: People unable to drive because of age, disability or income may have no substitute, while environmental and congestion effects may be unevenly distributed geographically.
Theme 7: Funding, Governance, Evidence & Accountability	Costs transferred to passengers may have cumulative equality impacts. Evidence was strongest for age, disability and caring responsibilities. Limited evidence on other categories should not be interpreted as proof of no impact.

4.5 Campaign Responses

Campaign responses are when organisations (or individuals) coordinate responses across their membership or support base, often by suggesting a set of wording for respondents to use. Campaign responses are usually very similar or identical to each other and can help provide an indication of the strength of feeling on an issue.

For this consultation, campaign responses have been analysed separately to responses on Citizen Space and individual email submissions to ensure the breadth of views received are summarised effectively and efficiently.

There were standard campaign responses, where the respondents had simply added their name to the standard text provided by the campaign organiser without making any changes to it, and non-standard campaign responses, where the respondents had edited the standard text provided by the campaign organiser or added their own comments to it before submitting it. As the campaign responses covered both Translink consultations, they were treated as an overall response.

Submissions by Unite, GMB, TSSA and SIPTU members

There were approximately 1,130 total responses, of which 1,106 were the general 'standard' text. There were 24 non-standard responses where the respondents had added their own text.

A summary of the standard campaign response is outlined below:

- Attributes the proposals to chronic Executive underfunding rather than falling passenger demand.
- Opposes post 10pm cuts, the yLink reduction, removal of off-peak fares and promotional fare increases.
- Highlights disproportionate impacts on women, young people, older and disabled people, minority ethnic communities, LGBT+ people, students, families and low-income household.

- Warns of lost connections, including late Enterprise arrivals at Belfast Grand Central Station, and wider economic, health, climate and congestion damage.
- Raises risks to the integrated publicly owned network, cross-subsidisation and long-term financial sustainability.
- Calls for withdrawal of the proposals and a properly funded multi-year settlement.

The 24 specific responses reemphasised the campaign position with concerns around employment and the night-time economy, post 10pm mobility, existing gaps in connectivity, and the absence of realistic alternatives. The combined message is not simply opposition to cuts. Respondents want a more reliable, better funded network that supports work, access, safety and modal shift.

4.6 Social Media Sentiment

There were a range of Social Media comments that, whilst not included in the overall analysis, were considered overall across the two consultations. The themes that emerged aligned with themes and responses identified within the consultation analysis:

Primary theme	Summary
Service availability & cuts	More routes, later/earlier services, Sunday coverage and protection from service reductions.
Fares, discounts & ticket fairness	Concern about youth discounts, worker pricing, free travel eligibility and restrictive tickets.
Governance, trust & management	Low confidence in leadership, responsiveness and operational management.
Spending, funding & priorities	Objections to branding/signage spend and debate over funding services and rail.
Reliability, timetables & connections	Services should run to timetable, connect sensibly and avoid recurring delays.
Communication & consultation	Key information is hard to find, and consultation is viewed as slow or unresponsive.
Accessibility, comfort & vehicle fit	Requests for smaller buses at quiet times and concerns about ride comfort.
Strategic transport policy	Support for reducing car dependence and making city-centre travel less car-focused.

5.0 POTENTIAL MITIGATION AND ACTIONS

A number of mitigation measures relating to the eligibility proposals were identified through the initial screening process. These measures were intended to reduce potential adverse impacts and support passengers during implementation. They included:

Customer communication and transition support

- Clear communications and lead-in time to allow adaptation to new arrangements
- Customer support at stations during implementation

Conductor discretion

- Flexibility where pre-purchase is not reasonably possible (e.g. accessibility issues, TVM outage)
- Customers requiring assistance or who have been unable to safely access a TVM prior to boarding, will therefore not be disadvantaged

Retention of Single ticket availability onboard

- Ensures continued ability to travel without pre-purchase

Protection of concessionary schemes

- No changes to statutory concessions (children, over 60s, disabled passengers)

Multiple ticket purchasing channels

- TVMs, platform validators, mLink and online options

Monitoring and review

- Ongoing review of impacts, particularly on younger people

Collectively, these measures were intended to mitigate the potential age-related impacts identified through screening, as well as concerns relating to affordability, accessibility and flexibility.

6.0 MONITORING ARRANGEMENTS

Throughout the EQIA process, Translink has continued to monitor its financial position and work closely with the Department to address the financial pressures facing the organisation.

Translink recognises the importance of monitoring the actual impacts of any changes implemented as a result of these proposals. Should the proposals proceed, Translink will undertake ongoing monitoring to assess whether any differential impacts arise for Section 75 groups that were not anticipated, or whether identified impacts are greater than expected.

Monitoring will include:

- Analysis of customer feedback, complaints and compliments received through established customer contact channels.
- Review of ticket sales, passenger journey and travel pattern data, where available, to identify any notable changes in usage by customer groups.
- Engagement with customers and representative organisations, including those representing Section 75 groups, to understand lived experiences and emerging issues.
- Feedback gathered through Translink's customer engagement activities, including station-based engagement, customer panels, surveys and consultation exercises where appropriate.
- Ongoing liaison with employee networks, community organisations, disability groups and other stakeholders to identify any unintended consequences.
- Consideration of any equality-related issues raised through media coverage, correspondence, elected representatives or advocacy groups.

The findings from this monitoring will be reviewed on an ongoing basis and will inform any mitigating actions, adjustments to implementation arrangements, or future policy development as required.

7.0 FINAL DECISION

Having considered the EQIA findings, the consultation evidence and the further assessment undertaken in response to the issues raised, Translink have decided to implement changes to commercial fares and restrict onboard ticket purchases on NIR services to Single tickets. The yLink discount will, however, be retained at 50% following funding provided by the Minister for Infrastructure through the Department for Infrastructure (DfI). The decision to proceed with the remaining commercial fare changes and the onboard ticketing change reflects the need to address ongoing financial pressures and support a more financially sustainable public transport network, following consideration and pursuit of alternative savings and efficiency measures. The commercial fare changes are expected to generate additional revenue while standard fares remain unchanged and statutory concessionary entitlements are unaffected. The onboard ticketing change will support the shift to pre-purchase through ticket vending machines, platform validators and digital channels, enabling conductors to focus more consistently on revenue protection and customer support. The remaining fare changes and the onboard ticketing change will be implemented subject to the mitigation, monitoring and review measures set out in this report.

Retaining the 50% yLink discount responds directly to a central concern raised through the consultation. The EQIA highlighted the importance of affordable public transport in supporting access to education, employment, training and social participation, particularly where passengers face financial pressures or have limited access to a car. The additional funding means that the proposed reduction from 50% to 33% will not proceed, avoiding the additional travel costs and associated potential disproportionate impact on younger passengers identified in the assessment. This is a significant change from the original proposal. However, it does not remove the potential impacts of the remaining fare and ticketing changes, which will continue to be subject to mitigation, monitoring and review.

To support the NIR onboard ticketing change, Translink will introduce a documented operational policy, supported by staff guidance and practical scenarios, to reduce the risk of disadvantage to disabled passengers and others who cannot reasonably access the available pre-purchase channels. These arrangements are intended to promote consistent and proportionate staff decision-making, protect passengers from unfair disadvantage and minimise the need for individuals to disclose or repeatedly explain personal circumstances.

The available evidence does not allow reliable quantification of the number of passengers who may be affected by the onboard ticketing change or how frequently they may need to purchase particular ticket types. This limitation has been expressly considered in reaching the final decision. On balance, the decision was considered justified in view of the necessary financial and operational benefits, alongside mitigation measures intended to reduce the risk of disadvantage and monitoring arrangements to assess the impacts on an ongoing basis.

Nevertheless, given the limitations of the available evidence, the potential for adverse equality impacts cannot be fully excluded. The effectiveness of the mitigation measures and any emerging equality impacts will therefore be monitored and kept under review in accordance with the arrangements set out in this report.

This final EQIA records the consultation evidence, the further consideration undertaken following consultation, the equality impacts identified and Translink’s response to the issues raised. It also sets out the mitigation measures adopted and the residual impacts associated with the final proposals. Following implementation, Translink will review monitoring evidence

on the operation and effects of the changes to identify any emerging, disproportionate or unintended equality impacts and determine whether further mitigation or adjustment is required.

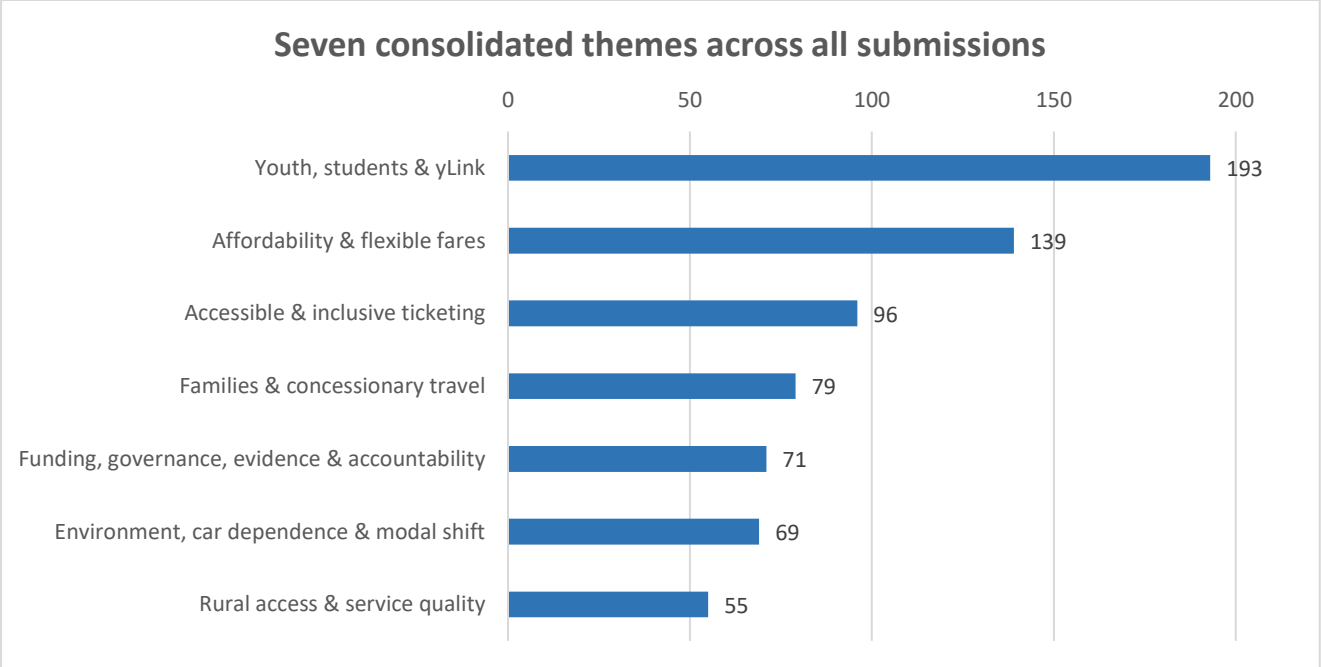
APPENDIX ONE: List of Consultees

Alliance Party of NI
Antrim and Newtownabbey Borough Council
Ards and North Down Borough Council
Armagh City, Banbridge and Craigavon Borough Council
Belfast Chamber of Commerce
Belfast City Council
Belfast One
Cathedral Quarter BID
Causeway Coast and Glens Borough Council
CBI Northern Ireland
Children's Commissioner
Democratic Unionist Party
Department for Infrastructure (DfI)
Derry City and Strabane District Council
Equality Commission for Northern Ireland
Federation of Small Businesses NI
Fermanagh and Omagh District Council
Hospitality Ulster
Inclusive Mobility Transport Advisory Committee (IMTAC)
Institute of Directors
Linen Quarter BID
Lisburn and Castlereagh City Council
Mid and East Antrim District Borough Council
Mid Ulster District Council
Migrant Centre NI
Newry, Mourne and Down District Council
NILGA
NI Chamber of Commerce
Northern Ireland Assembly
Northern Ireland Retail Consortium
Northern Ireland Tourism Alliance
Northern Ireland Youth Forum
NUS-USI
Retail NI
Royal National Institute for the Blind Northern Ireland (RNIB NI)
Sinn Fein
Social Democratic & Labour Party (SDLP)
The Consumer Council
Tourism NI
Ulster Unionist Party
Visit Belfast

APPENDIX TWO: Analysis of Responses

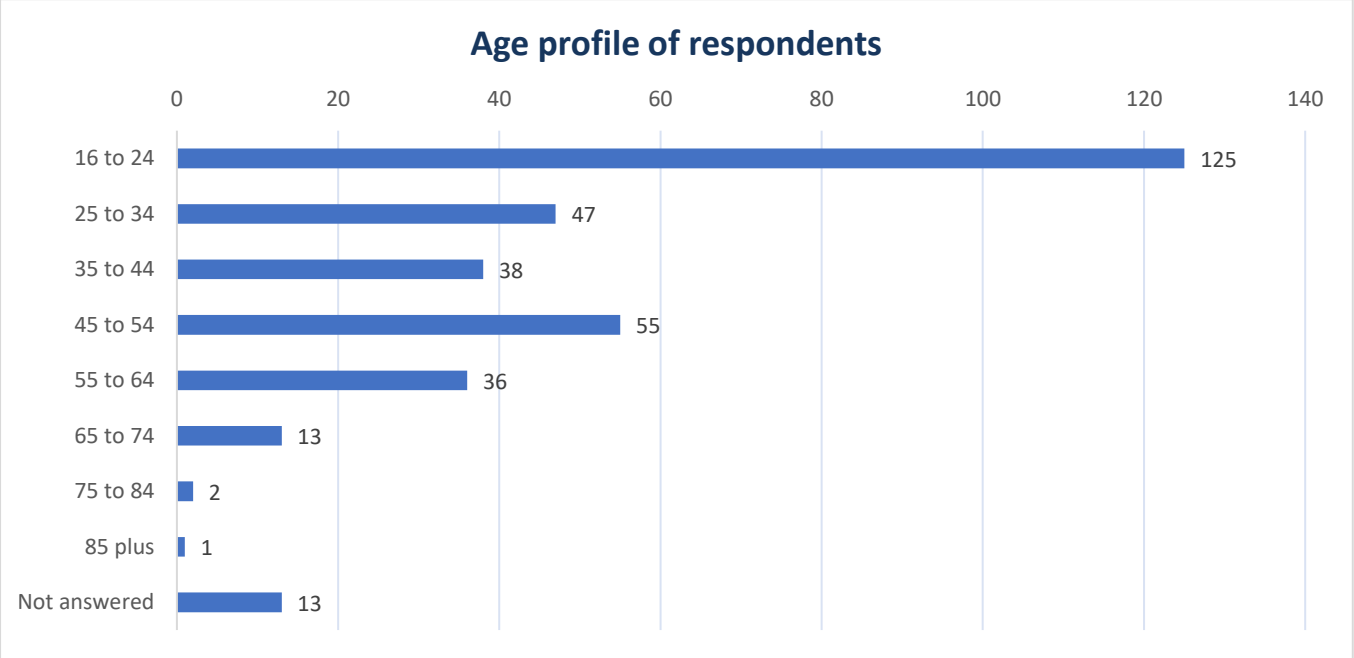
Summary of Citizen Space and Email Responses

TOTAL RESPONSES	CITIZEN SPACE	EMAIL RESPONSES	INDIVIDUALS OVERALL
351	330	21	92.0%
All submissions	Responses submitted online	Responses received by email	Share of all respondents



Respondent Profile and Completion (Citizen Space Only)

Age profile		
Age	**Count**	**% of all**
16 to 24	125	37.9%
25 to 34	47	14.2%
35 to 44	38	11.5%
45 to 54	55	16.7%
55 to 64	36	10.9%
65 to 74	13	3.9%
75 to 84	2	0.6%
85 plus	1	0.3%
Not answered	13	3.9%



Respondent type		
Type	**Count**	**% of all**
Individual	320	96.9%
Organisation	9	2.7%
Not answered	1	0.3%

Mitigations Proposed by Respondents

The consultation produced a range of substantive responses proposing mitigations or other actions. Respondents proposed retaining or limiting reductions to the yLink discount, protecting affordable off-peak, return, family and concessionary fares, and assessing any Senior SmartPass reform separately. They also called for accessible cash, onboard, staffed and telephone purchase options; clear reasonable adjustments; sustainable funding; stronger route, rural and equality evidence; and engagement with affected groups. If implemented, changes should be phased, monitored and adjusted or reversed where adverse impacts arise.

Mitigation proposed by respondents	Mentions*	Proposed Action
Retain the 50% yLink discount, or minimise and phase any reduction.	127	Assess alternatives to a reduction, publish route and journey purpose impacts, and protect access during education and training periods.
Retain affordable off-peak and day-return products and avoid disproportionate promotional-fare increases.	90	Publish worked fare examples and assess the cumulative package rather than each product change in isolation.
Protect family products, caring journeys and concessionary travel; assess any SmartPass reform separately.	107	Provide transitional protection and assess isolation, household cost and participation impacts before changing eligibility or price.
Preserve accessible, non-digital purchase routes and formal reasonable adjustments.	35	Maintain cash, onboard, staffed and telephone options; do not penalise passengers when technology is inaccessible or unavailable.
Complete route-level, rural and cumulative equality assessment before final decisions.	80	Publish product, geography, passenger and machine reliability evidence, including a Rural Needs assessment and multiple-identity analysis.
Protect network access, frequency and service reliability, especially where alternatives are limited.	72	Test fare changes against route availability and work with councils and community transport providers on gaps and disruption arrangements.
Secure sustainable public funding rather than transferring the funding gap to passengers.	65	Set out the funding and efficiency options considered, the savings expected and why passenger-facing changes are proportionate.
Engage affected groups and communicate changes, exceptions and support clearly.	67	Co-design implementation with young people, disabled passengers, councils, employers and community organisations.
Phase, monitor and review implementation with explicit adjustment or reversal triggers.	47	Track patronage, affordability, digital exclusion, rural access and equality outcomes; publish findings and act where harm emerges.
Test the package against modal-shift, congestion and climate objectives.	36	Monitor mode switching and ensure short-term revenue action does not undermine wider transport and net-zero policy.

**Counts overlap because one response can identify several mitigation themes. They indicate the breadth of mitigation evidence, not support for a single option.*