



Translink Disability Action Plan 2022 – 2026

THE CONSUMER COUNCIL RESPONSE

February 2023

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1. ABOUT US

The Consumer Council is a non-departmental public body (NDPB) established through the General Consumer Council (Northern Ireland) Order (The Order) 1984. Our principal statutory duty is to promote and safeguard the interests of consumers in Northern Ireland.

We are an insight-led, evidence based organisation:

- Providing consumers with expert advice and confidential guidance.
- Engaging with government, regulators and consumer bodies to influence public policy.
- Empowering consumers with the information and tools to build confidence and knowledge.
- Investigating and resolving consumer complaints under statutory and non-statutory functions.
- Undertaking best practice research to identify and quantify emerging risks to consumers.
- Campaigning for market reform as an advocate for consumer choice and protection.

We have specific statutory duties in relation to energy, postal services, transport, water and sewerage, and food affordability and accessibility. These include considering consumer complaints and enquiries, carrying out research, and educating and informing consumers. Our non-statutory functions educate and empower consumers against unfair or discriminatory practices in any market from financial services to private parking charge notices. Across all our areas of work, we pay particular regard to consumers:

- who are disabled or chronically sick;
- who are of pensionable age;
- who are on low incomes; and
- who live in rural areas.

The Consumer Council use a set of eight guiding principles (Figure 1) developed by the United Nations to assess where consumer interest lies; and develop and communicate our policies, interventions, and support.

These provide an agreed framework through which we approach regulatory and policy work. They ensure we apply a consistent approach across our statutory and non-statutory functions, and in all our engagement with consumers and stakeholders.

They assist us in identifying key issues and risks in service design and delivery, consumer impact, and how services should look and feel to the consumer.

Figure 1: Consumer Principles



2. RESPONSE TO CONSULTATION

The Consumer Council welcomes the opportunity to respond to Translink's Disability Action Plan (DAP) 2022-2026.

A Disability Action Plan is an important document setting out how a public authority will have due regard to the need to promote positive attitudes towards disabled persons, and encourage participation by disabled persons in public life in accordance with sections 49A and 49B of the Disability Discrimination Act 1995.

It is important that all consumers can access public transport as easily as possible. Translink's DAP should ensure that new actions and initiatives are progressed which make a real difference in improving accessibility for disabled people to our public transport services.

Overall comment and recommendations

- The DAP should focus on new actions. Therefore, it should place ongoing projects and initiatives in a separate section from new actions.
- Translink should review the action plan to ensure actions, measures and performance indicators are clear and tangible and measure the level of achievement, progress and success required.
- Actions should be specific to disability.
- Each action should state the team or staff member assigned responsibility for it.

Dissemination and promotion of the DAP and updates

- The Consumer Council recommends Translink produce an attractive, consumer-friendly version of the DAP and actively promote it to service users for their information.
- The DAP should be updated annually to reflect progress made and incorporate new initiatives if possible.

Comments on actions/measures

The following comments are to provide examples of what we believe might be included to improve the DAP. It is not exhaustive.

- 1.1 Performance indicator – *Develop an online module, accessible on the e-learning portal, for Managers in relation to disability duties and their responsibilities under the disability action plan.* The performance indicator should also include a target for the percentage of managers who complete the module.
- Measure 1.2 – *Promotion of accessibility developments on social media channels.* A tangible performance indicator could be to highlight where Changing Places facilities are available within the Translink transport network.
- 2.4 Performance indicator – *positive feedback from IMTAC.* This performance indicator should also state what will happen with negative feedback from IMTAC. Negative feedback can be particularly useful and Translink should demonstrate how it is used to improve accessibility.
- Performance Indicator 2.6 - to achieve and maintain WCAG 2 (website accessibility). In 2021 the Consumer Council conducted a pilot project of research to understand problems users were encountering with the accessibility of transport services websites, including Translink. The Consumer Council welcomed Translink's engagement on the findings and noted at that time, that many of the recommendations were in the process of being addressed. Achieving measure 2.6 1 will improve online content accessibility for Translink service users. Translink should ensure that it continues to engage with service users and their representatives to enhance the accessibility of online information.
- Translink should state actions and performance indicators within the DAP which measure accessibility initiatives for persons with a disability that are planned for important infrastructure projects such as York Street Station and Belfast Grand Central Station.

Review of disability related complaints

- We welcome the introduction of a mechanism to record complaints categorised by disability and action taken to address them. These complaints would benefit from an independent review such as the annual review the Consumer Council conducts of Translink complaints. This review provides valuable feedback and recommendations for Translink and gives consumers confidence in Translink's complaints handling process. Translink should consider the role of the Consumer Council and IMTAC in reviewing disability related complaints and identifying improvements where required.

Consultation process

- Translink should consider reviewing the consultation process for the DAP to make it more accessible to the users it affects most. The Consumer Council recommends that Translink should advertise the consultation as being open on a prominent position on the website and consider alternative communication channels including social media to maximise awareness of the consultation. During the period the consultation is open it would also be useful to have open engagement with stakeholders and consultees for example a webinar where Translink set out the detail of the DAP and attendees can ask questions.

Changing Places facilities

- 2.4 Performance indicator – *Changing Places facilities designed into all new stations and station refurbishments*. Translink in its Station and Facilities Accessibility audit could identify facilities which are not due for refurbishment but may be suitable to extend to a Changing Places type facility. City of Derry Airport is a good example of this. The Consumer Council has a role in facilitating accessibility forums at Northern Ireland’s three main airports. In the 2021 report on special assistance at City of Derry Airport forum members recommended a Changing Places facility be installed. City of Derry Airport considered this recommendation and whilst a facility could not be installed which matched exactly the requirements of a Changing Places facility due to size restrictions, they installed an “Accessible Changing Space”. The new facility will contain all the necessary equipment such as a hoist and bed and meets the specification as far as possible. They also committed to a full Changing Places toilet being included in future refurbishment works. This demonstrated a real commitment to making the airport accessible for all and was commended by all forum members.

3. SUMMARY AND CONCLUSION

The Consumer Council welcomes the opportunity to comment on Translink’s DAP 2022-2026.

We are pleased to see the inclusion of new initiatives in the DAP. Whilst we have provided some comment and examples in Section 2 we wish to highlight the following key takeaways in summary:

- The DAP should focus on new actions. Therefore, it should place ongoing projects and initiatives in a separate section from new actions.
- Translink should review the action plan to ensure actions, measures and performance indicators are clear and tangible and measure the level of achievement, progress and success required.
- Actions should be specific to disability.
- Each action should state the team/staff member assigned responsibility for it.

The Consumer Council would welcome the opportunity to discuss with Translink our comments made in this response.

4. CONTACT INFORMATION

To discuss our response in more detail, please contact:

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The Consumer Council consents to this response being published.