



**Comments from Imtac about the Department for  
Infrastructure Budget 2024 / 25 Equality Impact  
Assessment Public Consultation**

**(July 2024)**

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## **About Imtac**

The Inclusive Mobility and Transport Advisory Committee (Imtac) is a committee of disabled people and older people as well as others including carers and key transport professionals. Its role is to advise Government and others in Northern Ireland on issues that affect the mobility of Deaf people, disabled people and older people.

The aim of Imtac is to ensure that Deaf people, disabled people and older people have the same opportunities as everyone else to travel when and where they want.

Imtac receives support from the Department for Infrastructure (herein after referred to as the Department).

## **Introduction**

The Committee recognises the challenges faced across Government Departments created by the budget settlement for 2024-25. We acknowledge the budget involves very difficult or impossible choices for Ministers and officials. Given the scale of the proposed reductions in day-to-day spending there will inevitably be a reduction in services and the introduction of measures which will have negative consequences for all of society with particular negative impacts for people from the Section 75 groupings. Imtac, therefore, welcomes the decision to publish an Equality Impact Assessment consultation on the impact of the current budget. We fervently hope that the responses to the consultation will highlight what will be the catastrophic consequences of proceeding with the proposed spending reductions and will prompt a rethink of the situation.

This is the second year we have faced significant reductions to budgets and the second year a consultation has been published. In responding to the current consultation we have repeated many of the same issues raised by the Committee in our previous response<sup>1</sup>.

The Committee notes that the Minister has indicated his intention to protect the current budgets of community transport operators, Shopmobility schemes and advisory bodies such as Imtac. We welcome and fully support this proposal. However, it is important to note that community transport operators have seen significant reductions in

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<sup>1</sup> <https://www.imtac.org.uk/comments-imtac-about-budget-2023-24-equality-impact-assessment-public-consultation>

funding in previous years (including last year) and with rising costs a stand still budget is real terms cut in funding which will inevitably impact on services and users of these schemes.

## **The work of Imtac**

Whilst we acknowledge and welcome the intention of the Minister to continue to fund the work of Imtac we understand that the value of our work will be assessed alongside all organisations that fall under the discretionary spending remit of the Department. The Committee is proud of its role in providing one of the few opportunities for Deaf people, disabled people and older people to be directly involved in development of policies and services. Since our formation in 2006 we have worked to develop strong partnerships within the Department for Infrastructure, across other Government Departments, local councils, Translink and transport providers and, importantly, with grassroots organisations of Deaf people, disabled people and older people.

We stand over a track record of working with others to deliver real change which improves the lives of Deaf people, disabled people and older people. Examples of our achievements include:

- Helping to deliver the first Accessible Transport Strategy in the UK
- Helping to deliver key Executive projects including Belfast Rapid Transit – Glider
- Helping to deliver other key projects including the roll out of audio-visual information on Metro buses
- Ensuring public transport is more accessible through influencing the design of buses, trains and infrastructure
- Ensuring all future stations include Changing Places Toilets
- Ensuring inclusive and accessible place making through input into land use planning policy and public realm schemes
- Strengthening legislation to ensure disabled people have more rights when using transport services
- Influencing key policy areas including taxi regulation, concessionary travel, active travel and pavement and wider parking enforcement

From the perspective of the Department and wider Government, Imtac provides an essential opportunity to involve Deaf people, disabled people and older people in the development of policy and services therefore complying with both existing statutory equality duties and

obligations set out in the UN Convention on the Rights of People with Disabilities. Most importantly the work of the Committee assists the Department (and wider Government) to get policies, projects and services right from the start, rather than having to go through the expense and inconvenience of revisiting and retrofitting. We believe the Department receives exceptional value for the small annual budget Imtac receives. This is in no small part due to the commitment and expertise of our 18 members, who undertake their work on Imtac without payment. Reducing our budget will make little or no difference to the current financial situation but have a big impact on our work and the benefit it delivers for society. Removing our budget altogether will cause significant damage to the progress made in making our travel, our streets and places accessible and inclusive to everyone.

One final issue needs to be considered in relation to the continued funding of Imtac. Imtac is one of three similar advisory bodies of disabled people across the UK, with DPTAC and MACS advising the UK Government and the Scottish Government respectively. Based on the principle of parity, disabled people (and older people) in Northern Ireland will be disadvantaged compared to their counterparts in Great Britain if funding here is removed.

### **Consideration of data and research / Assessment of impact**

The evidence for the assessment of impact on Section 75 groupings in the EQIA is largely based on quantitative data held by the Department. The use of such data is helpful in identifying who currently uses services and the groups in society that will most likely be impacted if services are removed or reduced. Clearly analysis of this quantitative data has identified that disabled people and older people are potentially hardest hit by the proposed spending reductions.

The EQIA does not however take account of a wealth of available wider research which establishes the linkage between transport, travel, inequality and social exclusion in society. The use of this research would allow the EQIA to highlight the specific impacts reductions in services will have across the range of Section 75 groupings.

The seminal research on the linkage between transport and social exclusion was Making the Connections: Final Report on Transport and

Social Exclusion<sup>2</sup> published by the UK Government in 2003. There have been numerous subsequent research papers published on the topic since the publication of Making the Connections including a series of reports commissioned by the Department for Transport in 2019<sup>3</sup>.

The research has established the connection between a transport and travel policy based around car dependency and the inequality this has created for people with little or no access to the car. In summary a society has been created where travel is essential but also a society that has created barriers to travel for many people. These barriers include:

- A lack of availability of transport
- A lack of accessible transport
- The high cost of transport
- Inaccessibility of wider infrastructure and the inaccessible location of key services and activities
- Limiting factors such as much longer journey times and multiple connections for people not travelling by car

We know from the research that certain groups in society are impacted more than others by transport related social exclusion including:

- Disabled people
- Older people
- Younger people
- Women
- People from minority and ethnic communities
- People on low incomes

The research also demonstrates that social exclusion due to transport can be exacerbated for people living in rural areas compared to those living in urban areas.

Research including Making the Connections also tells us how poor access to transport impacts on people's lives and life opportunities including:

- Limiting access to employment

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<sup>2</sup> See [https://www.ilo.org/wcmsp5/groups/public/---ed\\_emp/---emp\\_policy/---invest/documents/publication/wcms\\_asist\\_8210.pdf](https://www.ilo.org/wcmsp5/groups/public/---ed_emp/---emp_policy/---invest/documents/publication/wcms_asist_8210.pdf)

<sup>3</sup> See for example <https://www.gov.uk/government/publications/access-to-transport-and-life-opportunities>

- Limiting access to education and learning
- Limiting access to key services including healthcare
- Limiting access to social, cultural and leisure activities
- Limiting access to cheaper food and consumables provided by larger supermarkets and retail outlets

Two other impacts arising from research such as Making the Connections are relevant to the current consultation.

Firstly, there is strong evidence that traffic impacts most heavily on the poorest communities. This means, for example, that statistically a child is much more likely to be killed or seriously injured as a pedestrian in a road traffic accident if they live in the most deprived 10% of wards.

Secondly, there is a cumulative impact on the individuals and communities arising from social exclusion, connected with transport. For individuals it means isolation, loneliness, and the associated impact on their mental health. For communities it means a lack of investment in local facilities, high unemployment, low educational achievement, poor health outcomes, higher levels of crime and anti-social behaviour.

## **Comments on the proposals outlined in the EQIA**

### Spending reductions

Imtac recommends that the Department reviews the consideration of existing and includes accepted research into the linkage between transport, travel, inequality, and social exclusion in its assessment of the equality impacts of the Budget 2024 / 25. The Committee believes such an approach will give a more realistic assessment of the impacts of the proposals contained in the consultation. We propose to highlight these impacts in the subsequent paragraphs.

Imtac has concerns about the proposals to reduce funding for key transport as well as wider public services. The proposed reduction in day to day funding for public transport is likely to see service reductions and complete withdrawal from some places . These reductions will have a catastrophic impact on people with limited or no access to a car. Research such as Making the Connections demonstrates the removal and reduction in these services is likely to impact most on disabled people, older people, younger people, people with dependents, women and people from minority and ethnic communities with the impact felt

most in rural areas and smaller towns, potentially isolating individuals and whole communities.

We are also extremely concerned about proposed reductions to Road Safety activities, roads maintenance and footway investment. The previously highlighted research indicates that more deprived communities are disproportionately impacted by traffic, so while the proposed reductions are likely to exacerbate existing road safety problems and ultimately lead to more people being killed and seriously injured using our roads, this is likely to impact more severely on deprived communities. A lack of maintenance and investment in footways is likely to impact most on people walking, wheeling, or cycling, making such journeys feel more difficult (in some cases impossible) and make people feel less safe. Research<sup>4</sup> demonstrates a lack of roads maintenance is likely to lead to more slips and falls (and associated rises in compensation payments) and is likely to impact most on disabled people, older people, younger people, people with dependents, women and people from minority and ethnic communities for whom such journeys are a necessity not a choice.

As previously indicated, whilst the proposed protection of the budget for community transport is welcome, rising costs mean a stand still budget is a cut in funding. This is on top of previous reductions in budgets. Imtac is concerned that already stretched services will become more stretched with travel options for users both further restricted and becoming more expensive as operators are forced to raise fares. Reductions in access to community transport services come at a time when other options such as taxi services have also become less available and accessible with the impact of the pandemic and cost of living significantly reducing the numbers of drivers. The net result of the proposals is travel choices for people with limited access to cars will be reduced.

Whilst these are the broad impacts of the proposals in the consultation, it is the real-world detrimental, cumulative consequences of the reductions on society that need to be acknowledged by Government. Removing and reducing services to such an extent will mean:

- A reduction in or loss of opportunities for employment for those impacted – Northern Ireland already has the highest employment

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<sup>4</sup> See for example the following report from Living Streets  
<https://www.livingstreets.org.uk/media/8128/pedestrian-slips-trips-and-falls.pdf>



gap between disabled people and non-disabled people in UK<sup>5</sup> and the budget measures will inevitably increase this gap.

- A reduction in or loss of opportunities to take part in primary, secondary, further and higher education and lifelong learning – Northern Ireland already has the highest levels of educational disparity between disabled people and non-disabled people anywhere in the UK<sup>6</sup>. The budget proposal will contribute to a worsening of an already dire situation.
- A reduction in access to key services including health and social care – Northern Ireland already has acute difficulties with health and social care services. The budget will make access to these services more difficult for many ultimately increasing the pressures in the system.
- A reduction in or loss of participation in social, cultural and leisure activities for many impacted – This is likely to contribute to increased isolation, loneliness and mental health issues, increasing the burden and costs for other public services.
- Increased travel and other costs (including food) for people impacted – The proposals will undoubtedly increase costs for people mainly currently living on lower-than-average incomes, increasing existing income inequalities during a cost of living crisis.
- A much less safe roads network leading to greater levels of deaths and serious injuries as well as increased trips and falls, deterring many people from making essential journeys walking, wheeling and cycling.

Four further broad and cumulative impacts of the spending reduction proposals need to be acknowledged.

Firstly, transport and travel are essential to enable everyone to participate in society. These proposals impact on people who currently experience the most difficulties travelling and impact least on people who have easy access to a car. If implemented, the proposals will undoubtedly significantly increase the pre-existing inequalities in society and undo progress in policy and service development that has taken decades to establish. Savings in the short term are being made at the expense of the longer term goal of a fairer more equal society. Further consideration needs to be given to mitigating the impacts on those who

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<sup>5</sup> <https://www.gov.uk/government/statistics/the-employment-of-disabled-people-2022/employment-of-disabled-people-2022>

<sup>6</sup>

<https://www.ons.gov.uk/peoplepopulationandcommunity/healthandsocialcare/disability/bulletins/disabilityandeducationuk/2019#highest-qualification-by-disability-status>

face the greatest barriers to travel and transport by placing more of the burden of any savings on those in society who experience the wider opportunities and travel choice afforded by the car, particularly as other options such as taxis are much less available than in the past.

Secondly, travel and transport have a cross-cutting impact across everything Government does. The consequences of the proposals will inevitably increase the pressures on other services provided by Government and ultimately lead to increase costs to provide healthcare, education, training and employment services. From this perspective the savings achieved are the definition of a false economy. Additionally deteriorating travel and transport infrastructure reduces the attractiveness of Northern Ireland as a place for economic investment and development further impacting on society.

Thirdly, Government in Northern Ireland has set ambitious targets around meeting the existential challenge of climate change. Key to this approach is reducing society's dependency on the car through reducing the need to travel and promoting and providing more sustainable travel options including better public transport and priority for walking, wheeling, and cycling. As well as increasing existing inequalities in society, the proposals will inevitably lead to increased car dependency making achieving our climate change goals impossible. To be clear Intac recognises that failure to adequately address the issue of climate change will have catastrophic environmental and social impacts on Northern Ireland society and once again significantly increase future costs for Government here.

Finally, the UK is a signatory to the UN Convention on the Rights of People with Disabilities. Recent UN inquiries and reports have identified regression in the implementation of the articles of UNCRPD and the progressive realisation of our rights. The reduction in services created by reduced funding will inevitably see a regression in the implementation of our rights around accessibility (Article 9). Wider reductions in spending by other Departments will impact on key rights including independent living, education, employment and access to an adequate standard of living. In short Northern Ireland will become a worse place to live for many Deaf and disabled people and the full realisation of our rights to be equal members of society will move further away.

## Other measures

The consultation does contain a number of measures aimed at generating more income. This includes the potential to raise and extend on-street parking charges. The Committee does not oppose these measures as it is consistent with Departmental policies that aim to encourage more sustainable travel. Two other measures for revenue raising are less justifiable.

The consultation indicates that fees for Blue Badges may rise in future. Previous consultation has indicated that for the majority of Blue Badge holders paying a fee is acceptable, with access to concessions offered by the Badge much more important than a small cost for application and renewal. It is likely that future consultation will indicate some support for an increase in fee but from Imtac's perspective any increase must be fair and proportionate, ensuring that the cost does not become a barrier to potential or existing users. Increases in fees should not exceed fees set by other administrations.

The most controversial element of the consultation is the proposal to charge administrative fees for applications from older people for the concessionary fares scheme. Imtac submitted a response to the review of the scheme undertaken last year<sup>7</sup>. The Committee was highly critical of a scheme that is piecemeal, unfair and ineffective in terms of targeting social exclusion. The lack of parity between concessions for older people and those available to disabled people is impossible to justify and the budget has again chosen not to address this inequality despite the sums of money involved in making this change being relatively small. Instead, further levels of disparity and difference has been added to the scheme with fees for some users and none for others.

Imtac has previously questioned how far concessions to people aged 60 to 66 meets the social inclusion aim of the policy. We have acknowledged that removing this concession is politically difficult. Whilst other jurisdictions offer free travel to people aged 60 and over, many don't. Some, such as Transport for London, offer free travel for people aged between 60 and 66 for a small fee (£20). Based on experience elsewhere Imtac believes it is justifiable to introduce a fee for people aged 60 and that £20 is reasonable.

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<sup>7</sup> <https://www.imtac.org.uk/comments-imtac-about-consultation-free-and-discounted-fares-public-transport-concessionary-fares>

No other jurisdiction charges people in receipt of the state pension a fee for concessionary travel. Based on this Imtac does not support fees being charged in Northern Ireland for people in receipt of the state pension. Northern Ireland is unique in not aligning its concessionary fares scheme with the state retirement age. As part of beginning the extensive work of reforming and improving current scheme, eligibility for the “senior” Smartpass should be equalised with the state pension eligibility.

Imtac welcomes and supports the proposal not to include eligible disabled people under proposals for fees. This does little, however, to reduce the unjustifiable discrimination and inequality in the application of concessions between older people and disabled people. The Committee’s key recommendation around concessionary fares policy remains that Government must equalise concessions for older people and disabled people.

## **Conclusion**

In our concluding comments on the consultation Imtac would simply restate its position. If implemented, all available evidence demonstrates the proposals, while affecting everyone, will have the most significant negative impacts across all the Section 75 groups. The proposals impact most heavily on those people who currently have least access to travel and mobility and will inevitably lead to a significant increase inequality in Northern Ireland society. In addition, the Committee believes reduced access to travel and transport will increase the pressure on other public services and ultimately lead to higher costs for Government. The proposals will make meeting climate change targets impossible and lead to catastrophic long-term consequences and additional costs for Northern Ireland society. Finally, the proposals combined with widespread reduction in services from other Departments, will result in delays and regression in the realisation of the rights of Deaf and disabled people.

Given the disproportionate and obvious impact of the measures on Section 75 groups, the Committee is recommending that, in line with the statutory equality duties, mitigating measures, including increasing funding for key services beyond what is set out in the draft Budget, are considered prior to final decisions being made. Where savings are required or income generating measures required, these measures should be targeted more at people in society who currently experience

the wider opportunities and travel choice afforded by the car rather than those who already have limited or no access to travel and mobility. The Committee recommends that detailed engagement take place with Imtac and others about mitigating measures and the protection of essential services such as public and community transport. In the longer term, strategy, policy and services need to be reviewed with a view to ensuring that more people in our society can access suitable transport.