



**Comments from Imtac about “The draft Programme for Government 2024-27 ‘Our Plan: Doing What Matters Most’” consultation**

**(November 2024)**

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## **Making our information accessible**

As an organisation of and for Deaf people, disabled people and older people Imtac recognises that the way information is provided can be a barrier to accessing services and participation in public life. We are committed to providing information about our work in formats that best suit the needs of individuals.

All our documents are available in hard copy in 14pt type size as standard. We also provide word and pdf versions of our documents on our website – [www.imtac.org.uk](http://www.imtac.org.uk). In addition, we will provide information in a range of other formats. These formats include:

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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).

## **Introductory comments**

Imtac welcomes the opportunity to respond to the current consultation on the draft Programme for Government. The Committee would like to thank officials from The Executive Office for attending and contributing to an online meeting with Imtac members and other disabled people about the current consultation.

We recognise the restrictions that the Executive is currently facing including the limited mandate and the extremely challenging financial climate. Under these circumstances it is understandable that the PfG seeks both to prioritise more immediate issues (Doing what matters most) at the same time as setting longer term priorities and missions. However, in responding to the consultation Imtac will use similar criteria to those it adopted in responding<sup>1</sup> to the previous consultation on the PfG Outcomes Framework in 2021.

The first criteria we are using is whether the draft PfG adequately addresses the current and longstanding discrimination and inequalities experienced by Deaf people, disabled people and older people in Northern Ireland. The second criteria, and linked to the first, is whether the draft PfG meets the Executive's obligations under the United Nations Convention on the Rights of People with Disabilities (UNCRPD) and more specifically whether the draft PfG addresses the significant

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<sup>1</sup> See <https://www.imtac.org.uk/comments-imitac-programme-government-draft-outcomes-framework>

concerns expressed by the UN CRPD Committee in its most recent report published<sup>2</sup> in April 2024.

Our comments also need to be understood in terms of our previous criticisms of the Programme for Government as lacking a rights based focus. The PfG has previously referenced Deaf, disabled and older people in relation to providing care and support linked to the outcome “We have a caring society that supports people throughout their lives”. Imtac maintains its position that this approach is a wholly stereotypical portrayal of Deaf people and disabled people as needy and a burden and having no place in a modern society. We maintain our previous recommendations that the language and content of the PfG, including its outcomes, must be amended to portray Deaf people, disabled people and older people having a clear right to be recognised as positive and equal contributors to Northern Ireland society.

Our response is divided into two sections. The first section is a commentary on the content of the consultation. The second is our recommendations on the gaps that need to be addressed if the PfG is to better reflect the key issues for Deaf, disabled people and older people.

### **Comments on the draft PfG**

In general, the draft PfG is disappointing in failing to address key issues for Deaf, disabled and older people. Despite this cohort being a significant and growing proportion of our society, large parts of the PfG make no reference to us; it might be said we are invisible for large sections of document.

There are some positive general statements within the document around ensuring that everyone benefits from the PfG regardless of “age” or “disability”, but these broad commitments are not reflected in the detail of the document, which makes it difficult for organisations such as Imtac to be hopeful that the fundamental discrimination and inequalities faced by Deaf, disabled and older people living in Northern Ireland will be addressed.

The draft PfG does include some specific commitments around disabled people which are welcome. These include a welcome focus on special educational needs (SEN) as one of the Immediate Priorities. It also

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<sup>2</sup> See

[https://tbinternet.ohchr.org/\\_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FGBR%2FFUIR%2F1&Lang=en](https://tbinternet.ohchr.org/_layouts/15/treatybodyexternal/Download.aspx?symbolno=CRPD%2FC%2FGBR%2FFUIR%2F1&Lang=en)

includes a broad commitment to improve the accessibility of transport, including for disabled people and rural communities, under the Building New Foundations section of the document. Finally, it is welcome the Proposed Action under the People section around Shaping a Better Tomorrow contains a broad commitment to introduce and implement the Social Inclusion Strategies which we assume will include the proposed Disability Strategy. Despite these positives, the PfG lacks proper detail about how these improvements will be achieved.

The Committee is broadly supportive of the approach taken in the document. We agree that there are urgent priorities including fixing our health services, addressing our housing issues and reforming our wider public services. We agree that we need to change our approach to how we invest in our infrastructure. We support the focus on people and the absolute importance of responding to climate breakdown. We also recognize that it is important that we grow our economy and that everyone benefits from this growth.

Despite this broad agreement the overall lack of detail in the document makes it impossible for us to identify how Deaf, disabled and older people will benefit from much of what is being proposed. Take housing by example, other than referencing a review of the Disabled Facilities Grant, there is no other reference or commitment to desperately needed accessible homes. Similarly with health, the priority is to reduce waiting times, but the PfG mostly ignores the importance and urgent need to fix our broken social care system.

We do have concerns about the support for public services not identified as a priority for PfG. Austerity has already impacted negatively on our public services. This includes reductions in funding for public and community transport services across the Region. We would point out that mobility and accessible transport underpins the ability of everyone to access or contribute to all societal activity and any reductions in transport services and funding is likely to impact negatively on the success of matters the Executive has identified as priorities in the draft PfG.

Overall, as currently drafted the PfG fails to provide enough detail to satisfy Imtac members that it will deliver the change required to tackle the current discrimination and inequalities experienced by many Deaf, disabled and older people in our society.

## **Our recommendations and priorities for the PfG**

### ***Recommendation 1***

Our key recommendation is that the PfG is amended to include an Executive wide undertaking to deliver equality to all in society through a broad commitment to respect, protect and fulfil human rights. Central to meeting such an approach is for the PfG to commit to enshrining the obligations such as the UN Convention on Rights of People with Disabilities and similar international obligations into law in Northern Ireland. Enshrinement of the UNCRPD and similar Conventions in law does not mean that everything will improve for Deaf and disabled people overnight, but it does guarantee that there will be improvements over time through the progressive realisation of our rights.

Imtac has previously published its vision for a New Approach to Travel, Our Streets and Our Places<sup>3</sup> based around implementing the key articles of UNCRPD. A central part of achieving this is engaging directly with Deaf and disabled people when developing policy and services here. The PfG should contain a strong commitment to engage directly Deaf, disabled people and older people and others when implementing any of the commitments contained in the Programme for Government (this is in line with obligation under Article 4.3 of CRPD and General Comment Number 7).

Although it is important that Deaf and disabled people are involved in all areas of the PfG, it is essential that we are part of the decision making around responding to climate change and a **just** transition to net zero. This must also include the involvement of Deaf, disabled people and older people directly on any Just Transition Commission when established as required by the Climate Change Act 2022<sup>4</sup>.

Imtac provides a model for how Government and others can engage effectively with Deaf, disabled and older people. Previous Executive projects, such as the Belfast Rapid Transit (Glider), provide ample evidence of the value of good engagement and co-design.

### **1 We recommend that the PfG contains a high-level commitment to co-design / co-cultivate policies and services**

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<sup>3</sup> See <https://www.imtac.org.uk/new-approach-travel-our-streets-and-our-places>

<sup>4</sup> See <https://www.legislation.gov.uk/ni/2022/31/enacted>

**with Deaf, disabled people and older people and that this commitment is implemented when undertaking the measures set out in the Immediate Priorities, the Building New Foundations and the Shaping a Better Tomorrow parts of the PfG**

### Recommendation 2

The second key recommendation in our New Approach is a radical shift in the current culture around how accessibility and inclusion is viewed. Rather than being seen as a burden, as an add on or something that is only done because legislation requires it, accessibility and inclusion needs to be seen as a societal benefit; something essential to the wellbeing and prosperity of everyone in Northern Ireland. Everyone has an equal right to co-exist on an equal and inclusive basis together. It is essential that the reform of our public services and the commitments under Shaping a Better Tomorrow reflect this change in culture. There are examples of other administrations adopting culture change programmes including the Welsh Government who have implemented social model training in partnership with Deaf and disabled people. Locally, Imtac has worked with Translink to ensure that senior leaders have received Disability Equality Training designed and delivered by Deaf and disabled people.

**2 We recommend that the PfG contains a high level commitment to work with Deaf, disabled and older people to identify and introduce actions to change cultures towards accessibility and inclusion across Government in Northern Ireland.**

### Recommendation 3

The third key recommendation in New Approach relevant to the Programme for Government is ensuring that public and private investment in our infrastructure and services builds in the highest standards of accessibility and inclusion. This must move us away from a minimum compliance culture to a culture where we ensure that everyone benefits from public investment. The PfG indicates that £26 billion will be invested in our infrastructure and services here. If the highest standards of accessibility are required when spending this money, this will make a significant contribution to the progressive realisation of our rights.

Whether it be requiring high standards of accessibility when investing in our transport system and services, our schools and hospitals, our housing and our sporting, leisure, community or cultural facilities and services investment should not leave barriers requiring expensive remedial measures in the future. A good example of this in practice is the adoption by Translink of a commitment to provide Changing Places Toilets in any new station development or re-development. A similar commitment across all Government Departments, requiring Changing Places facilities to be provided as a condition of funding is an example of something that could be transformative.

**3 We recommend the PfG must contain a high-level commitment to build in accessibility and inclusivity when spending public money and that this commitment is implemented when undertaking the measures set out in the Immediate Priorities, the Building New Foundations and the Shaping a Better Tomorrow parts of the PfG.**

*Other Recommendations*

In addition to high level commitments Imtac recommends some specific commitments be included in the final PfG:

- The PfG should commit to bring forward a Disability Strategy, codesigned with Deaf and disabled people and based on the articles of UNCRPD.
- Linked to the above the PfG should commit to the formation of a Regional Forum of Deaf and disabled people (reflecting General Comment Number 7 of the UN Convention) to assist the Executive with codesign and cultural change.
- The PfG should make explicit commitments to ensuring everyone can live independently as part of the community with undertakings to fixing issues within social care, investing in housing accessible to everyone and a transport system that is accessible and inclusive for all including people living in our rural communities.
- In relation to independent living the PfG should contain a commitment to reopen the Independent Living Fund in Northern Ireland to new applicants.
- The PfG should make explicit commitments to removing inequalities and barriers to participation in our education system (at all levels) and in our employment market.



- The PfG should commit to ensuring that everyone in Northern Ireland has access to an adequate standard of living, recognising the impact of austerity, the Covid 19 Pandemic and the cost-of-living crisis on groups such as disabled people and older people. Any further reductions in the levels of social security must be opposed by the Executive at all costs.

## Conclusion

In conclusion, Imtac recognises the difficult financial and budgetary climate that the Executive is operating under despite the Chancellor's recent budget announcements. In such an environment it is essential that the benefits of any investment in our services or infrastructure are maximised. Our recommendations are designed to ensure that the final PfG delivers for Deaf, disabled, older people and others.

It is also essential that financial challenges do not further undermine wider public services including our transport services. This, in the view of the Committee, will be counterproductive, increasing existing inequalities and will potentially undermine the priorities and proposals contained in the draft PfG.