



Comments from Imtac on the DRD Disability Action Plan 2007/10

Draft

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About Imtac

- 1 Imtac is a committee of disabled people and older people as well as others including key transport professionals. Our role is to advise Government and others in Northern Ireland on issues that affect the mobility of older people and disabled people.
- 2 Our aim is to ensure that older people and disabled people have the same opportunities as everyone else to travel when and where they want.
- 3 Imtac receives support from the Department for Regional Development.

Comments on the DRD Disability Action Plan 2007-10

- 4 Imtac welcomes the opportunity to comment on the Department's Disability Action Plan. Unfortunately the Committee was unable to comment prior to the formal publication of the plan. However we note that the plan is "regarded as work in progress and amended and updated as necessary to reflect any further consultation comments received."
- 5 The Committee believes that the Disability Duties for public bodies to promote positive attitudes towards disabled people and to encourage the participation of disabled people in public life are extremely important in challenging the barriers that society has traditionally placed in the way of disabled people. Access to transport and mobility in particular are essential when ensuring that disabled people can participate in public life in the broadest sense.
- 6 Imtac found the Action Plan difficult to comment on and is disappointed with the overall content of the plan. The Committee finds this frustrating as the DRD has already developed a blueprint for mainstreaming issues for disabled people in the Accessible Transport Strategy. The ATS contains 32 policies that seek to ensure that the

Department maximises the benefits to disabled people (and older people) of any money it spends on transport. The policies address key barriers that make using transport difficult including physical access, information, attitudes of others as well as personal barriers. Policies are also a guide to officials within the Department around mainstreaming issues for disabled people.

- 7 Given the DRD, probably more than any other Department, has already developed a policy framework to mainstream issues for disabled people it is disappointing that this is not fully reflected in the Disability Action Plan. As currently written the Plan lacks cohesion as many of the actions are unrelated. This gives the overall impression that there is a lack of understanding of issues for disabled people and direction from DRD as a whole.
- 8 Moreover members feel that as presented the Action Plan portrays a stereotypical picture of disabled people as needy and awaiting Government support – as one member put it “done to rather than doers”. Many of the changes around legislation, policy and service development have come as a direct result of the efforts of disabled people themselves. The ATS recognises this and views partnership with disabled people as essential in developing sound policy and services. This approach also fits the requirements of the Disability Duties. More work is required to reflect how disabled people are involved measures contained in the Action Plan.
- 9 The measures contained in the Action Plan do not fully reflect the range of policies and services the Department deliver that benefit disabled people. For example Roads Service has responsibility for parking and the Blue Badge Scheme in Northern Ireland. There are over 90,000 disabled people in Northern Ireland who have a Blue Badge. Questions need to be asked why such an important benefit for disabled people is not included in the Action Plan. Similarly the Department has invested hundreds of millions of pounds in

accessible public transport both in terms of vehicles and infrastructure but also in fare subsidy through the Concessionary Fares Scheme. Despite this the Action Plan contains no measures around mainstream public transport.

- 10 Some of the measures contained in the Action Plan are too broad in their scope. For example one measure is to implement the ATS Action Plan. Another is to support a range of accessible transport solutions for disabled people. Clearly to be of practical use as a mainstreaming document the Action Plan must deal with many of the issues covered by these broad measures as individual measures themselves.
- 11 Many of the Performance Indicators/Targets in these areas are actually measures in their own right. Imtac questions the validity of such an approach as it gives the impression the Department is trying to use existing service and policies as evidence of meeting the Disability Duties rather than assessing each of these activities as a separate measure. In general much more needs to be done to set clear and quantifiable targets for each of the measures in the Action Plan.
- 12 Members are particularly concerned about the measure in the Action Plan around training. It is indicative of these concerns that the measure in the action plan does not even mention disabled people in the text. Disability awareness training is a requirement of the Disability Duties. Imtac believes that Disability Equality Training delivered by an experienced disabled trainer is the most appropriate form of training around the Disability Duties. Given our previous comments about partnership with disabled people and the duty to involve disabled people Imtac believes that disabled people themselves should be involved in the development and delivery of training courses. As currently worded we do not believe the DRD are meeting the requirements of the Disability Duties around training.

- 13 Imtac welcomes the inclusion in the Action Plan of a measure around the Committee itself. It may be pedantic but the wording of the measure should reflect DRD policy – Imtac is the main source of independent advice not “a” source. Also under Performance Indicators Imtac is required to develop a work programme that reflects issues that affect older people and disabled people not “Government priorities”. Members find the indicators/Target somewhat strange given the nature of the Duties. Surely targets should be around recruitment of disabled people on to the committee, how Imtac involves disabled people in our work, our outreach work with disabled people, our communication strategy etc.
- 14 The Committee would like to comment on the contrast between the section in the Action Plan covering Previous Measures and the section entitled Action Measures. Previous Measures does reflect a Government Department with an understanding of issues that affect disabled people, a Department with a strategic and policy framework to address the barriers experienced by disabled people, a Department that has and is continuing to invest in a range of services to address these barriers and a Department that is committed to engaging with disabled people throughout this process. Unfortunately this very positive approach is not reflected in the Action Measures section.
- 15 There are some additional measures that could have been included under Previous Measures including investment in public transport infrastructure and policies around parking enforcement.

Recommendations

- 16 Imtac believes that the DRD has a unique opportunity because of work previously undertaken to develop a Disability Action Plan that represents best practice among public bodies in Northern Ireland.

Unfortunately the current Action Plan falls somewhat short of this. The Committee feels that the Action Plan would benefit from redrafting with much greater detail around the measures and the inclusion of measures that are particularly relevant for disabled people – measures should each have a quantifiable outcome.

- 17 The framework for the action plan already exists within the 32 policies of the ATS. The following are some examples:

Consult with ... disabled people and their representative organisations at an early stage in the development of new transport policies and projects and on the detailed implementation of access features in new infrastructure.

Promote the use of accessible vehicles on public transport and “alternative” transport services that are financially supported by Government.

Ensure adequate parking is provided for Blue Badge holders in convenient locations, to enable easy access to activities and facilities.

Adopt best practice in the design of all information produced about transport policies, initiatives and other guidance materials

- 18 In addition the plan could include measures on specific initiatives to benefit disabled people. The following are some examples:

Pilot Audio visual information systems on buses

Pilot of a taxi card scheme

Pilot of a number of travel training schemes

- 19 The plan would benefit from a clearer overall structure with perhaps actions grouped on the following framework:

Corporate actions – to be addressed by all divisions (eg information, training, engagement with disabled people)

Separate sections detailing actions for each Division including Roads Service, Ports & Public Transport Division and Regional Transportation & Planning

- 20 More detail is required around previous and existing measures.
- 21 The Department for Transport Disability Equality Scheme may be a useful guide for DRD around structuring a revised Action Plan and the level of detail that should be included. See <http://www.dft.gov.uk/about/sr/disabilityequalityduty/>
- 22 Imtac also recommends that the DRD adopt Disability Equality Training delivered by an experienced disabled trainer as a measure under the Action Plan. Imtac has produced guidelines around good practice and training which we have included with this response.

Conclusion

- 23 Imtac welcomes the opportunity to comment on the Action Plan. Whilst the Committee feels that as currently drafted the Plan is disappointing we do believe that the DRD has the opportunity to develop a plan which can be viewed as best practice. The Committee would welcome the opportunity to meet with officials to discuss how we can assist with this process.

Contact us

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