



Comments from Imtac on the Draft Code of Practice –
Provision and use of transport vehicles

September 2009

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Introduction

- 1 Intac 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 Intac receives support from the Department for Regional Development.

General Comments

- 4 Intac welcomes the opportunity to comment on the draft Code of Practice. The Committee would like to commend the Equality Commission for producing the Code in what has been a tight timescale. Given the lengthy delays in introducing the Regulations connected to the Code the urgency shown by the Commission is welcome.
- 5 We commend the Commission for involving disabled people in the development of the Code, consultation around the Code and an ongoing commitment to involve disabled people in the promotion of the new rights (when they are introduced). Intac is happy with the content of the Code. As our secretariat and members had the opportunity to comment on the Code during its development we will not be making detailed comments on the content.
- 6 Intac commends the Commission for being pro-active in seeking the views of disabled people and older people on the draft Code. We usually would not recommend a consultation period over the summer months. However given that the rights around the Code were introduced in Great Britain nearly three years ago and given the

Commissions desire not to further delay the introduction of these rights the timing of the consultation can on this occasion be excused.

- 7 One area of concern during the development and consultation on the Code has been the provision of information in accessible formats. Imtac would recommend the Commission look at procedures for providing information in different formats to ensure that in future disabled people can access the information in the most appropriate format in a timely manner.

Comments on draft Code

- 8 As previously stated Imtac was represented on the Group that developed the draft Code. As such we have already had the opportunity to comment on its detail. The Committee is also conscious that the Commission plans to develop separate guides to the new rights both for disabled people and the transport sectors concerned. This should deal with concerns about the technical nature of the draft Code. Given the purpose and status of the draft Code this is unavoidable.
- 9 Imtac is aware that the Code is a supplement to the wider Part 3 Code of Practice (Access to goods, facilities and services) and as such transport providers and others should be knowledgeable about both Codes. However the Committee does feel that more information is required in the draft Code around what happens if a dispute arises (page 17, paragraph 3.22).
- 10 More information is required under the section entitled "Modes of transport not currently covered by the Act" (page 10-11, paragraphs 2.21-2.22). As well as pointing out that maritime and air travel are not covered the code should also point out that services provided health, education and social services do not fall under the act nor do any community transport services operated under the current 10b permit.

- 11 The only other comment on the draft Code relates to information provided on Part 5 of the Disability Discrimination Act (DDA) 1995. Imtac notes that no mention is made of the fact that the Rail Vehicle Accessibility Regulations (RVAR) will be superseded by EU wide interoperability standards relating to access to rail travel for passengers with reduced mobility.

Next steps

- 12 Imtac hopes that the draft Code can be formally agreed as quickly as possible. More work needs to be done however in developing guidance for disabled people around the new rights in a range of formats including easy read. Specific guidance will also be needed for the different transport providers such as taxi operators. Finally we would like to see a proactive promotional campaign once the rights are in place which not only promotes the rights to disabled people and others but sends out a positive about the improved travel opportunities that now exist for disabled people here. Imtac is committed to working with the Commission to help achieve this

Conclusion

- 13 Imtac welcomes the opportunity to respond to the current consultation and would like to commend the Commission for the production of an excellent Code of Practice. We look forward to final agreement on the Code and the speedy introduction of the new rights for disabled people.

Contact us

- 14 If you have a query about this document or would like it in another format you can contact us at:

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More information on our members is available on our website, visit www.imtac.org.uk.

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